

October 10, 2019

Ms. Kirsten Walli Board Secretary Ontario Energy Board P.O. Box 2319, 27th Floor 2300 Yonge Street Toronto, ON M4P 1E4

Re: PF Resolute Canada Inc. (Resolute)

Application Pursuant to Section 35 of the *Electricity Act*, 1998

Ontario Energy Board: File No.: EB-2019-0206

Dear Ms. Walli:

I am writing pursuant to the Board's Notice regarding the above proceeding to request intervenor status.

AMPCO's Interest

AMPCO is a not-for-profit consumer interest advocacy organization. AMPCO's members represent Ontario's major industries: forestry, chemical, mining and minerals, steel, petroleum products, cement, automotive and manufacturing and business consumers in general. AMPCO members are major investors, major employers and a major part of communities in which we operate, across Ontario.

AMPCO and its member companies are well known to the Board. AMPCO participates in many proceedings, working groups, consultations and initiatives of the Ontario Energy Board in which matters relevant to Ontario's large electricity consumers are being addressed. AMPCO has previously been approved by the Board in numerous adjudicative proceedings.

AMPCO's interest in this Application is as an Association representing major electricity loads in the province of Ontario. AMPCO takes the position that all entities that participate in the Ontario electricity market incur significant costs to modify their equipment, operations and processes in such a way as to facilitate their participation. They do so with the belief that

the market rules will govern their participation fairly and that those rules (and any interpretation thereof) will not be changed unilaterally, retroactively and without appropriate justification in a way that harms a market participant's ability to participate. AMPCO wishes to ensure that such a situation did not take place.

We respectfully request that the Board please confirm AMPCO's eligibility for an award of costs in this matter as representative of the direct interests of consumers in relation to services provided by the IESO to the market and regulated by the Board. In making this request AMPCO;

- a. assumes that the Board will direct recovery of eligible costs from the IESO (i.e. from the market at large in the interests of which this proceeding is undertaken); and
- b. is aware that the Board seeks to avoid duplication of efforts and will be mindful in its participation not to unduly duplicate the efforts of Resolute.

Notice

Please serve all correspondence pertaining to this proceeding to AMPCO as follows:

Mr. Colin Anderson, President AMPCO 65 Queen Street West, Suite 1510 Toronto, ON M5H 2M5 canderson@ampco.org

and

Mr. Ian Mondrow Gowling WLG (Canada) LLP Suite 1600, 1 First Canadian Place 100 King Street West Toronto ON M5X 1G5 Ian.Mondrow@gowlingwlg.com

I trust this letter will suffice for the Board to grant intervenor status to AMPCO and to confirm AMPCO's eligibility for a cost award.

Please do not hesitate to contact me if you have any questions or require further information.



Best Regards,

Colin Anderson

President

Association of Major Power Consumers in Ontario

Copy to: PF Resolute Canada Inc.

Independent Electricity System Operator George Vegh, McCarthy Tétrault, LLP

Ian Mondrow, Gowling WLG