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December 6, 2019

Delivered by Email, RESS & Courier

Ms. Christine Long, Registrar and Board Secretary Ontario Energy Board P.O. Box 2319, 27th Floor 2300 Yonge Street Toronto, ON M4P 1E4

Dear Ms. Long:

Re: Application for Review of an Amendment to the Independent Electricity System Operator Market Rules Board File No. EB-2019-0242 Kingston CoGen Limited Partnership – Undertaking Response

Attached please find the undertaking response to Undertaking J2.1 in respect of the above noted proceeding.

This filing has been submitted electronically using the Board's Regulatory Electronic Submission System and two (2) hard copies will be sent via courier.

Yours very truly,

BORDEN LADNER GERVAIS LLP

Per:

Original signed by Flora Ho

Flora Ho

cc: John Vellone, BLG Ewa Krajewska, BLG John Windsor, Northland Power Inc. James Hunter, IESO Colin Anderson, AMPCO Ian A. Mondrow, Gowling WLG Michael Bell, OEB Staff Intervenors of Record

Filed: 2019-12-6 EB-2019-0242 Exhibit J2.1 Page 1 of 1

UNDERTAKING J2.1

Reference:

None.

Undertaking:

To check if KCLP qualifies for the no speed, no load start-up program in the Ontario energy market.

Response:

We assume that the no speed, no load start-up program mentioned refers to the IESO's Real-Time Generation Cost Guarantee ("RT-GCG") program.

At present, while KCLP is eligible to qualify for the RT-GCG program, KCLP is not registered for the RT-GCG program and as such is not eligible to submit costs under the program.