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June 17, 2022

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Marconi,

**RE: EB-2021-0243 - London Property Management Association Interrogatories ON APPrO Evidence
- Export Transmission Service Rate**

Please find attached the interrogatories of the London Property Management Association in the above noted proceeding on the APPrO evidence. LPMA has had the opportunity to review the draft interrogatories of VECC and has reduced any duplication of interrogatories where possible.

Yours very truly,

Randy Aiken
Aiken & Associates

c.c. All Parties to EB-2021-0243

ONTARIO ENERGY BOARD

**GENERIC UTR ISSUES HEARING – EXPORT
TRANSMISSIONS SERVICE RATE**

**INTERROGATORIES OF THE
LONDON PROPERTY MANAGEMENT ASSOCIATION
on APPrO EVIDENCE**

LPMA-1

Ref: Power Advisory Evidence, para. 72

- a) Please explain how congestion rents are used to fund transmission expansion, particularly with respect to funding an economic buildout of intertie capacity.
- b) What is the expected impact on congestion rents of additional intertie capacity? In particular, if additional intertie capacity increases the level of exports but also reduces the intertie congestion price, would congestion rents be expected to increase or decrease relative to the current level of intertie capacity?
- c) What would be the expected impact on ETS revenues of additional intertie capacity?

LPMA-2

Ref: Power Advisory Evidence, para. 73 & 74

The evidence states that the fixed ETS is a low transaction cost and encourages bidding behaviour by market participants to determine the value of both the interties and real-time supply between Ontario and other markets.

- a) Does Power Advisory recommend that the Ontario Energy Board maintain the status quo of the current design including a low ETS rate? Please explain fully.
- b) Please provide an upper bound on what Power Advisory would consider a low ETS rate.

LPMA-3

Ref: Power Advisory Evidence, para. 116

If the OEB determines that an ETS rate should be continued, does Power Advisory believe that the rate should be adjusted on a going forward basis based on the same factors that will impact rates under the incentive regulation mechanism proposed by Hydro One?

LPMA-4

Ref: Power Advisory Evidence, para. 121

Please define “a materially higher transaction cost through an increased ETS rate”. In particular, what level of an ETS rate would Power Advisory not consider to be materially higher than the current level of the ETS rate?