25 Adelaide St. E Suite 1602 Toronto ON, M5C 3A1



August 27, 2008

Ontario Energy Board P.O. Box 2319 27<sup>th</sup> Floor 2300 Yonge Street Toronto, ON M4P 1E4 August 26, 2008

Attention: Kirsten Walli, Board Secretary

Dear Ms Walli

## Re: Guidelines for the Pre-Approval of Long Term Gas Supply and/or Upstream Transportation Contracts EB-2008-0280

The Board has issued a letter dated August 22, 2008 indicating that in its March 30, 2005 report on Natural Gas Regulation in Ontario: A Renewed Policy Framework on the Ontario Energy Board Natural Gas Forum that it would offer the utilities the opportunity to apply for pre-approval of long term supply and/or transportation contracts (LTC Guidelines). The Board has indicated that it is now conducting a consultation process regarding the development of LTC Guidelines. The Association of Power Producers of Ontario (APPrO) believes that this is an important issue and would like to participate to express its views along with other interested parties in this process. APPrO also requests that it be eligible for costs incurred in its participation as outlined in the Board's letter.

APPrO is a non-profit association that advocates on behalf of Ontario generators in a number of settings, including regulatory proceedings before the Board. The members of APPrO represent more than 95% of Ontario's generating capacity and are active in every generation technology: gas, wind, cogeneration, district heat and power, nuclear, hydroelectric, coal, solar, geothermal, energy from waste and fuel cells. Gas-fired generators are major customers of the gas utilities and are directly affected by the availability of appropriate gas services and the rates that are charged for those services. APPrO has of recent, actively participated in a number of Ontario Energy Board Proceedings including:

- the Natural Gas Electricity Interface Review (NGEIR) (EB-2005-0551),
- Incentive Regulation Framework for Natural Gas Utilities (EB-2007- 0606/0615),

- the Gas Natural Gas Storage Allocation Policies process (EB-2007-0724/0725), and,
- the Storage and Transportation Access Rule (STAR) (EB-2008-0052)

APPrO believes that long term supply and/or upstream transportation contracts are important issues and would like to offer its views in this proceeding.

Please direct correspondence related to this matter to:

Dave Butters, President Association of Power Producers of Ontario 25 Adelaide St. E Suite 1602 Toronto ON, M5C 3A1

Phone: 416-322-6549 Fax: 416-481-5785

Email: david.butters@appro.org

And to:

John Wolnik Elenchus Research Associates Inc. 83 Guildford Cres. London, ON N6J 3Y3 Phone: 519-474-0844

Fax: 519-474-0844 jwolnik@era-inc.ca

Sincerely,

David Butters President & CEO