

Ontario Energy Board	
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To provide answer as to which category in the curtailment plan generators are included and whether the gas generator would be curtailed on a semi-regular basis.

RESPONSE

EGD does not expect to curtail gas generators using firm distribution service on a semi regular basis. Unbundled power generators have limited ability to draft the system in the winter based on the provision of their rates. In addition, EGD may declare an Operational Flow Order ("OFO") at 24 hours notice which would reduce the power generator's ability to draft the system to nil. To the extent that EGD is able to declare an OFO, EGD does not expect that unbundled power generators would exacerbate a supply shortfall situation.

If time is of the essence to balance the distribution system and maintain system integrity, EGD would declare force majeure. By virtue of their size, power generators would be placed in Phase 1, however EGD's communications protocol require it to take the following steps before a decision is made to cut gas generator load. The power generators would be notified; and the EGD website (Operational Status page) would be updated to reflect the operational constraint. The IESO would then be contacted and a discussion would be held to determine the criticality of power generation at that time and within that geographical region. Enbridge Gas Distribution and the IESO will collaborate to the extent possible to maintain both gas and electrical system integrity, however, EGD notes that the Gas Distribution Access Rule prohibits the disclosure of specific customer information to third parties, including the IESO. Depending upon the nature of the information required, the IESO may have the need to approach the Board for certain amendments to or exemptions from these GDAR requirements.

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