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**APPRO**

ASSOCIATION OF  
POWER PRODUCERS  
OF ONTARIO

July 7, 2009

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 2300 Yonge Street  
Toronto, Ontario, Canada M4P 1E4  
[boardsec@oeb.gov.on.ca](mailto:boardsec@oeb.gov.on.ca)

Dear Ms Walli,

**Re: EB-2009-0152 -- Staff Discussion Paper on the Regulatory Treatment of  
Infrastructure Investment for Ontario's Electricity Transmitters and Distributors**

With regard to the above noted Staff Discussion Paper, APPRO recommends that with respect to new or modified approaches to cost recovery to support infrastructure investment in renewable generation (which APPRO supports in principle), such approaches should be available to all regulated entities along the value chain (Generation, Transmission, Distribution), and that the treatment should not be exclusive to the Green Energy Act. The Act is a catalyst for changing the regulatory construct, but whether the investment is directly in response to the Act should not be an exclusive criterion.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Butters', enclosed within a large, hand-drawn oval.

David Butters  
President & CEO