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**By electronic filing**

September 26, 2011

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
27<sup>th</sup> floor – 2300 Yonge Street  
Toronto, ON M4P 1E4

Dear Ms Walli,

**Ontario Power Generation Inc.**  
**Consultation on 2013-2014 Payment Amounts Application**  
**Board File No.: EB-2011-0286**  
**Our File No.: 339583-000003**

As solicitors for Canadian Manufacturers & Exporters (“CME”), we have reviewed the Board’s letter of September 8, 2011, to parties to EB-2010-0008, in which the Board invites comments on the prioritization of issues and on the updated Filing Guidelines for Ontario Power Generation Inc. (“OPG”).

We believe that the filing of an Application, together with its pre-filed supporting evidence, is a necessary first step in any process that is intended to lead to a pre-hearing prioritization of issues. We are of the view that participants need to have an opportunity to consider the Application and pre-filed supporting evidence before they can reasonably be expected to identify and prioritize issues raised therein. We question whether issues can reasonably be identified and prioritized before any Application and pre-filed supporting evidence have been delivered.

We have no specific concerns with respect to the updated Filing Guidelines that Board Staff has prepared.

We look forward to working with OPG and stakeholders to assure that its Next Payment Amounts Application proceeds efficiently.

We were unable to provide these brief comments on Friday of last week because of the pressures of other work, and apologize for the late delivery of these brief comments on behalf of CME.

Yours very truly,

A handwritten signature in blue ink, appearing to read 'Peter Thompson', is written over a blue horizontal line.

Peter C.P. Thompson, Q.C.

PCT\slc  
c. Nancy Coulas (CME)  
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