

Toronto

November 3, 2014

Patrick G. Welsh  
Direct Dial: 416.862.5951  
PWelsh@osler.com  
Our Matter Number: 1157793

Montréal

Ottawa

**By Electronic Mail and Filed Electronically on RESS**

Calgary

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
27th Floor, P.O. Box 2319  
Toronto, ON M4P 1E4

New York

Dear Ms. Walli:

**APPrO Request for Intervenor Status  
Hydro One 2015 and 2016 Distribution Rates Application  
EB-2014-0140**

We are counsel to the Association of Power Producers of Ontario (“APPrO”). APPrO requests intervenor status in the above proceeding before the Ontario Energy Board (“OEB”).

APPrO participated in the negotiation of the Settlement Agreement filed by Hydro One in this proceeding, and is a party to the Settlement Agreement. APPrO also participated in Hydro One’s previous transmission rates proceeding (EB-2012-0031). APPrO’s sole interest in this proceeding is the export transmission service (ETS) tariff, which forms part of the Settlement Agreement.

APPrO also intends to seek an award of costs.

The members of APPrO represent more than 98% of Ontario’s generating capacity and are active in a wide range of power generation technologies including gas-fired power, wind energy, cogeneration (CHP), nuclear, hydroelectric, solar, geothermal, energy from waste, fuel cells and other types of generation. APPrO brings the perspectives of the generation sector to Board proceedings and initiatives, and has a direct interest in the promotion of economic efficiency and cost-effectiveness of the electricity infrastructure of Ontario.

APPrO is eligible to apply for a cost award because it represents the direct interests of ratepayers in relation to services that are regulated by the OEB (section 3.03(a), OEB *Practice Direction on Cost Awards*, revised April 2014). The OEB has normally found APPrO to be cost award eligible (e.g., EB-2013-0301) because in its interventions,

APPrO is not representing its commercial interests, other than as a ratepayer (as per section 3.04(b) of the OEB's *Practice Direction on Cost Awards*). The OEB found APPrO to be eligible for a cost award in Hydro One's last transmission rates proceeding (EB-2012-0031).

APPrO members have (in all but exceptional circumstances) organized themselves to intervene and participate through APPrO, ensuring the most efficient use of the Board's and other Parties' time and resources. This not only reduces the level of active involvement by individual generators, but also hopefully gives the OEB the benefit of understanding the consensus view of generators on a variety of issues.

APPrO is a non-profit entity, and OEB cost awards typically cover only a portion of APPrO's true costs of participating in OEB proceedings. The balance comes from the dues paid by APPrO's members, or other ancillary revenue sources (e.g., event sponsorship).

APPrO requests that copies of all further communications and materials in this matter be served on APPrO and its counsel as follows:

**David Butters**

President & CEO

The Association of Power Producers of Ontario (APPrO)

Suite 1602, 25 Adelaide St. E.

Toronto, ON M5C 3A1

Tel: 416-322-6549

[david.butters@appro.org](mailto:david.butters@appro.org)

**Richard King**

Partner

Tel: 416-862-6626

[rking@osler.com](mailto:rking@osler.com)

**Patrick Welsh**

Associate

Tel: 416-862-5951

[pwelsh@osler.com](mailto:pwelsh@osler.com)

Osler, Hoskin & Harcourt LLP

Box 50, 1 First Canadian Place

Toronto, ON M5X 1B8

Fax: 416-862-6666

Yours very truly,

A handwritten signature in black ink, appearing to read "Patrick G. Welsh". The signature is stylized with a large initial "P" and a long horizontal stroke at the end.

Patrick G. Welsh  
Associate  
PW:

c: David Butters, *APPrO*  
Richard King, *Osler, Hoskin & Harcourt LLP*