



**APPrO**  
ASSOCIATION OF  
POWER PRODUCERS  
OF ONTARIO

August 30, 2006

**Re: OEB Cost Allocation Review for distribution File #: EB-2005-0317**

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
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Dear Ms Walli,

APPrO would like to respond briefly to your letter of August 21 in which you seek further comment from stakeholders on issues related to load data, weighting factors and CDM costs. We have no comment on weighting factors or allocation of CDM costs.

With respect to Load Data Requirements for Optional 3rd Run for Load Displacement Class, we would like to go on record with our view that the question is reasonable. In fact we believe it should go further.

APPrO recommends that if an LDC has modeled a separate rate classification for customers with load displacement facilities, it should also be required to base the load profile for the class on actual or estimated demand data that takes into account diversity among the load displacement facilities. It would not be sufficient for an LDC to provide an explanation that it has not provided for any recognition to reflect diversity.

Furthermore, APPrO recommends that LDCs be required to provide for information purposes load data for both the separate classes and the classes jointly, showing the diversity benefits of treating the customers with load displacement facilities as a sub-class rather than as a totally separate class.

Thank you for your attention to this matter,

Jake Brooks

Executive Director

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