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ONTARIO ENERGY BOARD

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July 5, 2009

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, Suite 2700  
Toronto, Ontario M4P 1E4

Re: **EB-2009-0152**  
**Staff Discussion Paper on the Regulatory Treatment of Infrastructure Investments**

Dear Ms. Walli,

Atikokan Hydro Inc. is pleased to provide the Board our comments and concerns with the Staff Discussion Paper on the Regulatory Treatment of Infrastructure Investments.

If you have any questions, please contact the undersigned at (807) 597-6600.

Yours truly,

A handwritten signature in cursive script that reads "Wilf Thorburn".

Wilf Thorburn  
CEO/Secretary-Treasurer

**Comments to OEB related to EB-2009-0152 “Staff Discussion Paper on the Regulatory Treatment of Infrastructure Investments” from Atikokan Hydro****Background**

Atikokan Hydro has provided some comment on Proposed Amendments to the Distribution System Code Board File EB-2009-0077. Atikokan Hydro is pleased to provide some general comments on the infrastructure investments and then will make some comments on two specific items.

Atikokan Hydro looks forward to being able to be a player in the GEGEA framework and direction the province is heading. Atikokan Hydro still has SOP entities in the queue. One of the challenges for the SOP process was quantifying the technical requirements for the connection. Having gone part way through that process, I would ask that the board consider the implications and costs to determine the method of connection.

I would ask the board to consider that if the proposed generation is larger than the LDC load, that it would automatically be considered as a transmission connection. This would have at least two benefits. The cost of the studies and potential connection would automatically be spread across all customers, and this method would reduce additional protection and control expenses by eliminating duplication of protection equipment and power quality remediation.

**Comments:**

- Item 19: We believe that some clarification how to treat end of life and unneeded facilities that may need to be rebuilt to connect an embedded generator. In our case the load has dropped so the facilities are no longer needed and the cost of rebuilding will be excessive if the LDC bears a significant portion of the cost.
- Item 23: We support the Board permitting LDC applicants being able to seek approval prior to construction of facilities to determine whether the facilities qualify for the requested alternative treatment(s). We believe that the investments for expansion or renewable enabling improvements may be very large relative to the size of the utilities rate base. If these investments cannot be shared on a province basis they could force excessive rate increases on the LDC customers.