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September 29, 2009

VIA COURIER

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St., Suite 2700
Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: Connection Cost Responsibility Review, EB-2008-0003

Great Lakes Power Transmission (“**GLPT**”) continues its support of the Ontario Energy Board (the “**OEB**” or the “**Board**”) for showing its insight, initiative and leadership in developing the recently published proposed amendments (the “**Proposed Amendments**”) to the Transmission System Code (TSC), as outlined in the Notice of Revised Proposal to Amend a Code (the “**Notice**”) issued September 11, 2009.

GLPT appreciates that changes to government policy has necessitated some delay in finalizing the Proposed Amendments. Now that the policy has clarified, GLPT anticipates that this process, which began in December, 2007, can now be concluded.

GLPT believes that two issues will require deliberation in the implementation of the ‘hybrid model’: the mechanism for cost recovery and the process for transmitter designation. However, although there are still some unanswered questions on the implementation of the policy, we believe the Proposed Amendment now provides sufficient direction for parties to move forward with applications for transmission designation.

On the issue of cost recovery, GLPT expects the financial arrangements among transmitters and renewable generators will evolve as the parties consider how to cost effectively implement the Proposed Amendments. GLPT hopes the Board will entertain flexibility in its consideration of approaches to the implementation of cost recovery that will provide the appropriate incentives to the transmitter to undertake enabler facilities while

September 29, 2009

- 2 -

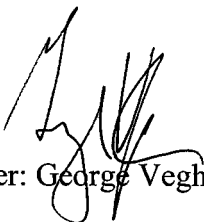
staying within the underlying construct of the 'hybrid model' i.e. that generators are made responsible for their proportionate share of the costs of enabler facilities' capacity.

In the issue of transmitter designation, we note that this code amendment process is necessary but not sufficient because, when completed, the process only authorizes applications. Actual projects will still require approval in transmitter designation proceedings.

At this stage, GLPT suggests that the most important imperative for the Board is to allow the applications to proceed, and to not be overly restrictive either on the types of approaches that can be taken to designate a transmitter or to the types of remedies that can be sought by transmitters. The Board has recognized that many types of alternative remedies may be necessary for transmitters and distributors to implement the system expansions required to facilitate renewable power. Panels in proceedings will have the ability to sort through which outcomes are in the public interest based on the facts of a given application.

GLPT therefore respectfully submits that the Proposed Amendments should be incorporated into the Transmission System Code. Applications may then come forward with types of approaches that can be taken to designate a transmitter and the types of remedies that can be sought by transmitters.

Yours very truly,
McCarthy Tétrault LLP


Per: George Vegh

c: Peter Bettle, Great Lakes Power Transmission
Tim Lavoie, Great Lakes Power Transmission
Jeff Rosenthal, Great Lakes Power Transmission