

June 25, 2009

**RESS & COURIER**

Ontario Energy Board  
P.O. Box 2319  
27th Floor  
2300 Yonge Street  
Toronto ON M4P 1E4

Attention: Ms. K. Walli, Board Secretary

Dear Ms. Walli:

**Re: Comments on Proposed Uniform Transmission Rates Effective July 1, 2009 -  
EB-2008-0272**

We are counsel to Great Lakes Power Transmission LP ("GLP") in respect of the above-noted proceeding.

The Board issued a notice on June 15, 2009 providing GLP with the opportunity to comment on materials filed by Hydro One in connection with this proceeding (the "Notice"). In particular, Hydro One was directed to file its calculation of the Uniform Transmission Rates, charge determinants and revenue shares resulting from the Board's May 28, 2009 Decision with Reasons.

In response to the Notice, GLP has elected to provide the Board with an update to its annual charge determinants. This is set out in the attached submissions of GLP.

Yours truly,



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**cc:** T. Lavoie, GLPTLP

## ATTACHMENT 'A'

### **Submissions of Great Lakes Power Transmission LP**

GLP's most recently approved charge determinant forecast can be found at Exhibit 4.1 of Hydro One's submission dated June 11, 2009. As noted in that Exhibit, GLP's current annual charge determinants were approved on December 11, 2001. Given the period of time since these charge determinants were last updated, and the significant changes to the Transformation Connection determinants, GLP is hereby providing the Board with its updated charge determinants.

#### **GLP's Methodology**

GLP chose to use an historical average methodology to develop a forecast of charge determinants to be used in calculating the UTR. The historical information used to develop this forecast is published by the IESO for Ontario's transmitters, and is described below.

Each month, the IESO makes available a number of reports that provide information on loads and peaks for each of the transmitters in Ontario. One particular report, the "Transmitter Reconciliation Final Data File" is created on a monthly basis and details the monthly peaks and the total revenue generated by asset pool.<sup>1</sup> GLP has analyzed this report for each of the months in the period of January 2004 to April 2009, extracted the monthly peaks by asset pool, and developed a forward-looking forecast based on the historical information. The results are as follows:

##### Network Pool:

For over 5 years, the peak loads in GLP's Network pool have been very consistent. Therefore, GLP used the average annual peak loads for the five year period of May 1, 2004 to April 30, 2009. The resulting charge determinant for the Network pool is similar to the approved figure from 2001.

##### Line Connection Pool:

Similar to the Network pool, the peak loads in the Line Connection pool have also been very consistent for over 5 years. Therefore, GLP used the average annual peak loads for the five year period of May 1, 2004 to April 30, 2009. The resulting charge determinant for the Line Connection pool is also similar to the approved figure from 2001.

##### Transformation Connection Pool:

In the fourth quarter of 2006, a direct transmission customer of GLP assumed responsibility for its own transformation. As a result, beginning in December 2006, the peak demands in the Transformation Connection pool have decreased significantly. Therefore, in order to incorporate this reduction, GLP used the average annual peak loads for the two year period of May 1, 2007 to April 30, 2009.

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<sup>1</sup> The three asset pools being Network, Line Connection, and Transformation Connection

The table below outlines the currently approved charge determinants, and compares them to the proposed charge determinants, calculated based on historical averages:

	Annual Revenue Requirement (\$)	Annual Charge Determinants (MW)		
		Network	Line Connection	Transformation Connection
<b>GLP per HONI's Exhibit 4.1</b>	34,785,422	4,150.498	2,847.032	2,777.933
<b>GLP proposed</b>	34,785,422	4,029.342	2,949.276	1,040.890
<b>Variance</b>		(121.156)	102.244	(1,737.043)