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VIA E-Mail and RESS FILING

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
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Toronto ON M4P 1E4

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Dear Ms. Walli

Re: Regional Planning for Electricity Infrastructure - Proposed Amendments to the Transmission System Code and the Distribution System Code (EB-2011-0043)

The Power Workers' Union ("PWU") represents a large portion of the employees working in Ontario's electricity industry.

The PWU is committed to participating in regulatory consultations and proceedings to contribute to the development of regulatory direction and policy that ensures ongoing service quality, reliability and safety at a reasonable price for Ontario customers.

On May 17, 2013, the Ontario Energy Board (the "Board") issued a notice of proposed revisions to the Transmission System Code ("TSC") and the Distribution System Code ("DSC") ("Proposed Amendments").

In the PWU's view the Proposed Amendments add clarity, reasonableness, flexibility and transparency to the TSC and DSC's provisions related to the process for a more structured regional planning process. In particular, the PWU is pleased that the Proposed Amendments recognize the importance of transmitters leading the regional infrastructure planning processes and developing regional infrastructure plans for each region, as required, in consultation with applicable licensed distributors, other licensed transmitters and the OPA, as appropriate.

HONORARY COUNSEL

Ian G. Scott, Q.C., O.C.
(1934 - 2006)

In the November 8, 2011 Board Staff Discussion Paper,¹ section 4.2.2, Board staff proposed an issue for comment:

Do stakeholders believe that 115 kV lines should be classified as Dual Function Lines or as Network lines where they perform both a Connection and a Network function? Please explain the rationale for the approach supported.

In its submission on the Board Staff Discussion Paper:

The PWU submits that 115 kV lines that perform both a Connection and a Network function should be classified as Dual Function Lines and the costs are allocated to both the Line Connection and Network pools based on the extent each relevant asset is used for Connection vs. Network purposes. There is no question that reclassifying such 115 kV lines as Network assets would be simpler from an administrative perspective; however, doing so would be inconsistent with the principles of cost causality and beneficiary pays.

The PWU does not see any reference to this issue in the Proposed Amendments and would appreciate clarification on the status of this issue.

Yours very truly,


PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

Richard P. Stephenson

cc: John Sprackett
Judy Kwik

¹ Ontario Energy Board, EB-2011-0043. Board Staff Discussion Paper. Regulatory Framework for Regional Planning for Electricity Infrastructure. November 8, 2011.