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By electronic filing

June 18, 2013

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th floor
Toronto, ON M4P 1E4

Dear Ms Walli

**Renewed Regulatory Framework for Electricity (“RRFE”)
Notice of Proposed Amendments to the Transmission System Code and
the Distribution System Code**

Board File No.: EB-2011-0043

Our File No.: 339583-000098

On June 4, 2013, we requested cost award coverage in this matter for our client, Canadian Manufacturers & Exporters (“CME”). However, we have not yet received a response to that request. We were hoping that CME would have been accorded cost eligibility before submitting the brief comments which follow on the Board’s Proposed Amendments to the Transmission System Code (“TSC”) and the Distribution System Code (“DSC”).

The deadline for submitting comments was yesterday, June 17, 2013. We were unable to submit these comments yesterday because I was engaged in a Stakeholders’ Meeting with representatives of Union Gas Limited at the Ontario Energy Board offices in Toronto.

As indicated in our June 4, 2013 letter seeking cost eligibility on behalf of our client, CME has consistently supported the adoption of a more coordinated electricity system planning process. In that context, we support the Proposed Amendments which impose on transmitters the obligation to lead the regional infrastructure planning process in consultation with other affected parties and, in the course of performing that leadership role, to conduct periodic regional needs assessments.

A matter, related to the leadership of coordinated regional planning amongst electric utilities and cost-effective investment in transmission and distribution facilities, which is of continuing concern to our client, is the total bill impacts that such activities are likely to have, having regard to all of the other factors that are concurrently contributing to electricity bill increases. In that connection, we respectfully suggest that those leading the coordinated regional planning exercise should require all those involved in the process to provide periodic total bill impacts on a forward looking basis as part of the information to be considered in the course of conducting the periodic needs assessments and in identifying the most cost-effective course to follow in relation to investments in transmission and distribution facilities.

We believe that the Proposed Amendments to the TSC and the DSC empowering transmitters to conduct periodic needs assessments, including the power to require all licenced distributors and licenced transmitters in a region and the Ontario Power Authority (“OPA”) to provide information which the transmitter considers is reasonably required, are broad enough to facilitate the preparation of periodic total bill impact information which can then be used as necessary to influence planning decisions which are cost-effective and economically sustainable.

If the wording of the Proposed Amendments is insufficient to allow those leading the coordinated regional planning exercise to obtain this type of total bill impact information, then the wording should be broadened to allow that information to be obtained and used in the coordinated regional planning process.

CME requests an award of its reasonably incurred costs for reviewing the Proposed Amendments and providing this brief letter of comment thereon.

Yours very truly



Peter C.P. Thompson, Q.C.

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c. Paul Clipsham

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