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September 18, 2009

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

Dear Ms. Walli:

Re: EB-2008-0003 – Comments of the LPMA on the Board’s Further Revised Proposed Amendments to the Transmission System Code

This letter is in response to the Board’s September 11, 2009 letter related to the Notice of Revised Proposal to Amend a Code – Further Revised Proposed Amendments to the Transmission System Code (EB-2008-0003). Three paper copies have been provided to the Board and an electronic version has been file through the Board’s web portal at www.errr.oeb.gov.on.ca.

These are the written comments of the London Property Management Association (LPMA). Comments have been provided on the specific proposed revisions set out in Section II of the Board’s Notice.

1. Basis for Identification of Enabler Facilities

LPMA agrees with the two additional circumstances as described in the Notice. First, the OPA will be in the best position of anyone to determine the best locations of renewable resource clusters. This is particularly so through the OPA administered FIT program.

Similarly, the transmission system planning process should be used to identify potential renewable resource clusters and the associated enabler facilities.

2. Enabler Screening Criteria for OPA-Identified Clusters

In general, LPMA supports the screening criteria as described for OPA-identified clusters. In particular, LPMA agrees with the criterion that the line connection facility must be at least 10 km long, with the exception noted in the Notice. This approach would appear to ensure that the cost of the enabler facility along with the costs of the individual proponent connections to it would be less than, or at least not more than the aggregate cost of all individual connections to the transmission system.

Similarly, LPMA agrees with the minimum capacity requirement associated with the resource cluster. However, LPMA believes that the Board should include an exception to this criterion similar to the one for the line length. There may be situations where the cost of enabler facility, along with the costs of the individual proponent connections to it would be less than the aggregate cost of all individual connections to the transmission system. Without this exception, it would appear that the approach would not be supportive of the Board's new objective of promoting the connection of renewable resources as set out in the GEGEA amendment to the Act.

3. Use of Line Allocator as a Cost Allocator

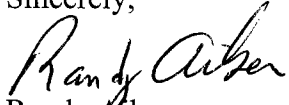
LPMA accepts the removal of the line length concept as a component of the calculation of each generator's pro-rata share of the cost of an enabler facility. As a number of parties have indicated, this could have resulted in the delay of the connection of "end-of-the-line" generators. Removal of the line length in the calculation will shift some costs from these "end-of-the-line" generators to the "front-of-the-line" generators. However, it is unlikely that this shift will delay the connection of these "front-of-the-line" generators as it could for the "end-of-the-line" generators.

4. Line Losses

LPMA supports the proposed amendment to section 2.0.14. This clearly indicates that in the case of an enabler facility, each connection between the enabler facility and any customer facility connected to the enabler facility is a "connection point".

If you require any further information or clarification, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Randy Aiken". The signature is written in a cursive style with a large, prominent "R" and "A".

Randy Aiken

Aiken & Associates