

June 16, 2010

RESS, EMAIL & 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: Great Lakes Power Transmission LP - Transmission Project
Development Planning (EB-2010-0059)**

These are supplemental submissions of Great Lakes Power Transmission LP ("GLPT") in respect of the Board Staff Discussion Paper "Transmission Project Development Planning" dated April 19, 2010 (the "Paper") and in particular, with respect to the submissions of Hydro One Networks Inc. ("Hydro One") dated May 31, 2010.

The Paper sets out a number of proposed criteria for the Board to consider in the designation process. One of these criteria is "landowner and other consultations" (p. 13 and p. 24). In respect of land issues, a transmitter would be required to set out its approach to and plan for obtaining all rights-of-way and other land use rights that would be required for the purposes of the development and construction of that project(s) in its plan. No one criteria is necessarily, or even likely, determinative and the Board should not limit itself to one.

In Hydro One's submission, Hydro One states that the definition for network reinforcement should be defined as those that use existing transmission network facilities, "including transmission corridors".

The definition of transmission reinforcement adopted by the Board will establish the threshold for projects that will be subject to the designation process. GLPT submits that the use of transmission corridors as a criteria should not form the basis of the definition of transmission reinforcement.

As noted above, land ownership is only one of the criteria that the Board should use to assess a project and it should not be used as a means to pre-empt projects from the designation process. It is possible that based on all of the criteria a project could be advanced which is more efficient and more economical than one which has historically established rights-of-way. The Board should not preclude itself from the review of multiple designation applications primarily because of existing rights-of-way possessed by a transmitter. This would not be in the public interest.

Yours truly,

A handwritten signature in black ink, appearing to read 'Charles Keizer', with a long horizontal flourish extending to the right.

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cc: A. McPhee, GLPT
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