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February 23, 2011

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: TransCanada Power Transmission (Ontario) LP - Electricity Transmission
License Application - Board File No. EB-2010-0324**

We are legal counsel to Great Lakes Power Transmission LP ("GLPT"). Attached are the submissions of GLPT in respect of this matter.

Yours truly,

A handwritten signature in black ink, appearing to read "Charles Keizer", written over a horizontal line.

Charles Keizer

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cc: B. Kelly, TransCanada
J. Fernandes, Board Staff
A. McPhee, GLPT
J. Myers, Torys

IN THE MATTER OF the *Ontario Energy Board Act 1998*, S.O. 1998, c.15, (Schedule B);

AND IN THE MATTER OF an application by TransCanada Power Transmission LP, pursuant to sections 57(b) and 60 of the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Schedule B for an electricity transmission licence.

**SUBMISSIONS OF GREAT LAKES POWER
TRANSMISSION LP**

February 23, 2011

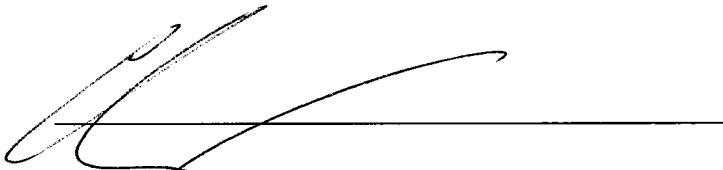
1. The singular basis of the transmission licence application of TransCanada Power Transmission (Ontario) LP (“TPT”) is to participate in the transmission designation process set out in the Ontario Energy Board’s (the “Board”) Report on Transmission Development Planning (EB-2010-0059). Although the designation process will be adjudicative in nature, the process could be competitive if multiple transmitters file development plans as part of the designation process.
2. In its report, the Board stated that “The Board believes that introducing competition in transmission development will improve economic efficiency and lead to better outcomes for the consumer.”¹
3. Where exemptions to the Affiliate Relationships Code are sought by an applicant for purposes of participating in a designation process, the Board should adopt the principle that any exemptions sought should not be given where it could provide the party seeking the exemption a potential advantage relative to other transmitters in respect of the

¹ Board report, EB-2010-0059, p. 10.

designation process. The Board should apply this principle in the context of TPT's application.

4. GLPT has also had the benefit of reviewing the submissions of the Independent Electricity System Operator (the "IESO") filed in this matter. At page 6 of its submissions, the IESO indicated that incumbent transmitters may have to apply for amendments to add the "Designated Transmitter" category. GLPT believes that this is not necessary and would be duplicative because incumbent transmitters have already demonstrated the ability to carry out the transmission function; their licences have already been amended by statute under Section 70(2.1) of the OEB Act to permit them to file transmission plans; and an existing licence would be amended in the future to add any new facilities if the transmitter is designated and leave to construct is granted.

All of which is respectfully submitted on behalf of
Great Lakes Power Transmission LP, by its counsel



Charles Keizer