

Monday, April 18, 2011

Ontario Energy Board
P.O. Box 2319
2300 Young Street, Suite 2700
Toronto, Ontario M4P 1E4

Attention: Board Secretary

Dear Sir/Madam:

Re: Comment on EB-2011-0067

ORTECH Power, a division of Ortech Consulting Inc. ("ORTECH") is pleased to file comments in regards to EB-2011-0067. ORTECH consults on the planning and permitting of renewable energy projects. ORTECH has advised on over 50 renewable energy project applications on behalf of clients over the past 4 years and is intimately familiar with issues related to the connection process.

Our comments relate to the OWA application for an exemption for waterpower related to CCA deposits and are as follows:

- 1) The OPA FIT program acknowledges that waterpower has longer permitting timeframes than other technologies.
- 2) The MNR site release process documentation acknowledges that waterpower has longer permitting timeframes than other technologies.
- 3) ORTECH's experience has shown that waterpower has longer permitting timeframes than other technologies.
- 4) ORTECH noted the longer permitting timeframe as an issue in a comment letter dated August 27, 2009 on a related matter under file EB-2009-0088.
- 5) Requiring CCA deposits well in advance of construction is an inefficient use of capital, especially when expensive venture capital is involved.

- 6) OWA proposes to delay CCA deposit costs related to waterpower projects, but not avoid them. There is no additional cost to the rate base related to making deposits only if and when required. Indeed, since all costs are ultimately reflected in costs borne by the rate base, it is responsible to avoid unnecessary costs at all times.
- 7) **ORTECH deems the OWA application under file EB-2011-0067 to be reasonable under the circumstances.**

We are grateful for the opportunity to comment. Please feel free to contact us at the above address, or the undersigned at hvanbakel@ortech.ca .

Yours truly,

Hank Van Bakel, P.Eng.
Vice President, Operations