

July 20, 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: Upper Canada Transmission Inc. - Electricity Transmission License
Application - Board File No. EB-2011-0222 - Interrogatories**

We are counsel to Great Lakes Power Transmission LP ("GLPTLP"), intervenor in the above-referenced matter. We attach Interrogatories on behalf of GLPTLP pursuant to Procedural Order No. 1 in the above-noted proceeding. These have been filed on RESS today.

Yours truly,



Jonathan Myers

Tel 416.865.7532
Fax 416.865.7380
jmyers@torys.com

cc: O. Romaniuk, UCT
I. Mondrow, Counsel to UCT
G. Birgisson, Counsel to UCT
A. McPhee, GLPTLP
C. Keizer, Torys

**Upper Canada Transmission Inc.
(EB-2011-0222)**

Interrogatory Questions from Great Lakes Power Transmission L.P.

Interrogatory #1

References

- (1) Application cover letter dated June 3, 2011 re “Exemptions Requested”

Preamble

(1) In its application cover letter, Upper Canada Transmission Inc. (“UCT”) requests “exemptions, until such time as it becomes designated by the Board as a transmission developer or owns and/or operates transmission facilities in the province, from (1) The Board’s Affiliate Relationships Code for Electricity Distributors and Transmitters (ARC); and (2) The Board’s Electricity Reporting and Record Keeping Requirements (RRR).”

Questions

- (a) In light of the Board’s decision in TransCanada Power Transmission (Ontario) L.P.’s (“TPT”) transmission licence application (EB-2010-0324) to deny TPT’s requests for (a) a temporary exemption from the transmitter obligations of Section 3 of the RRR until it becomes designated to undertake transmission work or otherwise becomes active in the Ontario transmission market, and (b) exemptions from sections 2.2.2 (this request was withdrawn by TPT) and 2.2.3 of the ARC, as well as the Board’s decision in Icon Transmission Inc.’s (“Icon”) transmission licence application (EB-2010-0403) to deny Icon’s request for a temporary exemption from Section 3 of the RRR until it becomes licensed and owns or operates transmission assets in Ontario, is UCT prepared to withdraw its own requests for temporary blanket exemptions from the ARC and the RRR?
- (b) If UCT’s response to (a) is no, please describe how the circumstances of UCT’s application and exemption requests differ from the circumstances in EB-2010-0324 and EB-2010-0403.

Interrogatory #2

References

- (1) Section 18 of Application re Ontario Market Activities.
- (2) Schedule B to the Application.

Preamble

- (1) UCT indicates that there are 8 generation facilities being developed by its Affiliates, including 2 projects that have received FIT Contracts and 6 projects that are awaiting FIT Contract offers.
- (2) UCT indicates that the 2 projects that have received FIT Contracts will be filing for generation licences in 2011 and that, for one of these projects, an application for leave to construct a transmission line has been filed with the Board (EB-2011-0027).

Questions

- (a) Please provide an update as to the status of the Ontario market activities of UCT and its Affiliates since the Application was filed, with respect to (i) EB-2011-0027, (ii) the filing of generation licences, (iii) the development of generation facilities that have been awarded FIT Contracts, (iv) the awarding of any new FIT Contracts for projects described in the Application, and (v) the development or acquisition of any projects or facilities not otherwise referred to in the Application.

Interrogatory #3

References

- (1) Sections 9 and 10 of the Application.

Preamble

(1) In Section 9 of the Application, UCT indicates by having not ticked the relevant boxes that it does not intend to contract for design, construction, customer connection, inspection and maintenance and operation of transmission facilities. However, UCT indicates that it does intend to contract for “other” activities.

(2) In the description of “other” activities to be contracted under Section 9 of the Application, UCT states that it anticipates procuring services from engineering and construction consultants and contractors.

Questions

(a) Please clarify which activities UCT intends to use the capability of others for in developing, constructing, maintaining and operating transmission facilities in Ontario, as well as the persons that UCT intends to contract with for such activities, if known.

(b) If the transmission licence is granted, which, if any, of the key individuals listed in Section 10 of the Application would be located in Ontario? What other staff would UCT have in Ontario? Will any such key individuals or other staff share office space with any Affiliate of UCT?

(c) What are UCT’s plans for operating and maintaining transmission facilities in Ontario, particularly with respect to (i) staffing and (ii) training in Ontario-specific practices, procedures and requirements for transmission?