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March 16, 2012

Delivered by Email

Ms. Kirsten Walli, Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2701
Toronto ON M4P 1E4

Dear Ms. Walli:

**Re: AltaLink Ontario L.P. ("AltaLink")
East-West Tie Line designation proceeding (EB-2011-0140)**

We are writing on behalf of AltaLink pursuant to Procedural Order No. 1 to register an objection to the intervention requests of Great Lakes Power Transmission EWT LP ("GLPT EWT LP") and Hydro One Inc. ("Hydro One") and to request a clarification as to the scope of the intervention request of Hydro One Networks Inc. ("HONI") in light of a commitment made by Great Lakes Power Transmission LP ("GLPT").

In total, five EWT LP related entities have intervened in this proceeding: Hydro One, HONI, GLPT, GLPT EWT LP, and the Ojibways of Pic River First Nation.

AltaLink acknowledges that some EWT LP related entities have a legitimate interest in participating in this proceeding. However, AltaLink is concerned that through multiple interventions one registered transmitter is attempting to secure "multiple kicks at the can" during the designation proceeding by reserving the right to participate multiple times in the filing of evidence, interrogatories and submissions all in support of the EWT LP application.

AltaLink does not believe that this tactic is appropriate or fair for the purposes of the Board's designation process. To the best of AltaLink's knowledge, no other registered transmitter has any other related entity that is participating as an intervenor in this proceeding. EWT LP alone would gain an unfair advantage during the designation proceeding.

The Minister in his March 29, 2011 letter regarding the East-West Tie designation process and the Board in its *Board Policy: Framework for Transmission Project Development Plans* indicate that one of the main objectives of this designation process is to "encourage new entrants to transmission in Ontario and bring additional resources for project development." AltaLink submits that the Board should err on the side of caution to ensure that new entrants have a fair and balanced chance in this designation process by ensuring that incumbent transmitters and related entities cannot intervene in a way that directly or indirectly attempts to frustrate the policy goals that underpin the entire process.

AltaLink objects to the intervention request of GLPT EWT LP and Hydro One because their respective interventions are based solely upon their roles as limited partners of EWT LP. Each of

GLPT EWT LP and Hydro One indicates that it "supports EWT LP's application in this proceeding". Furthermore, each of GLPT EWT LP and Hydro One indicates that it "reserves the right to file evidence and participate in the interrogatory portion of the proceeding."¹

GLPT EWT LP and Hydro One are participating in this proceeding strictly to file evidence and interrogatories and submissions in support of EWT LP. AltaLink submits that this is inappropriate and their intervention requests should be denied.

Finally, AltaLink notes that in its intervention request GLPT commits to limiting its intervention to providing information and assistance to the Board and to providing submissions with respect to any issue, requirement, plan or any other aspect which might have an impact on GLPT's system. Further, GLPT commits in its intervention letter that it "does not propose to express preferences for any particular plan put forth in this proceeding, but merely to provide information and submissions where called for [...]."

HONI's intervention request was not similarly framed. Rather, HONI is seeking to participate presumably only in respect of the two issues identified in its intervention request letter. AltaLink would like clarification from HONI as to whether it is willing to make a similar commitment as GLPT in respect of its involvement in the designation proceeding. Specifically, AltaLink submits that HONI should not express preferences for any particular plan put forth in this proceeding, but should limit its participation merely to provide information and submissions where called for.

Sincerely,

Original signed by John A.D. Vellone

John A.D. Vellone

CC: Steve Hodgkinson, AltaLink
Intervenors of record in EB-2011-0140

jv

¹ See the Hydro One intervention letter dated March 2, 2012 and GLPT EWT LP intervention letter dated March 5, 2012.