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May 28, 2012

RESS, COURIER & EMAIL

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: Deferral Account Application by Hydro One Networks Inc. (EB-2012-0180)
Intervenor Submissions of Great Lakes Power Transmission LP**

In accordance with Procedural Order No. 1 dated April 18, 2012, as one of the licensed transmitters that currently recovers its revenue requirements through the Board-approved Uniform Transmission Rates ("UTRs"), GLPTLP has been adopted as an intervenor in the above-referenced proceeding and offers the following submissions.

In its application, Hydro One Networks Inc. ("HONI") has requested an Accounting Order authorizing it to establish the East-West Tie Deferral Account (the "Requested Account") for the purpose of recording expenses relating to the proceeding to designate a transmitter to carry out development work for the East-West Tie Line (EB-2011-0140) (the "Designation Proceeding"), as well as subsequent connection-related activities. In particular, HONI's application indicates that the amounts that it would record in the Requested Account would include:

- (a) Costs for the Designation Proceeding that are apportioned to HONI by the Board for purposes of recovery through UTRs;
- (b) Costs incurred by HONI, as an incumbent transmitter, to support the Board in the Designation Proceeding and to eventually facilitate connection of the East-West Tie Line to HONI's existing transmission system; and
- (c) Costs incurred by HONI relating to preliminary engineering and other station connection work required to accommodate the East-West Tie Line up to the point where leave to construct such line is granted.

With respect to (a) and (b) above, GLPTLP anticipates that it may be subject to many of the same costs that HONI proposes to record in the Requested Account. In particular, as a licensed transmitter that recovers its revenue requirement through UTRs, it is expected that costs for the Designation Proceeding would similarly be apportioned to GLPTLP by the Board in that

proceeding. In addition, GLPTLP anticipates that it too may incur costs should the Board request its support or assistance in connection with the Designation Proceeding. To the extent that the Board finds it appropriate for HONI to establish the Requested Account for purposes of recording costs under (a) and (b) above, the Board should also provide for the establishment of an equivalent deferral account for GLPTLP.

Yours truly,

A handwritten signature in dark ink, appearing to read "L. Andrew McPherson". The signature is written in a cursive, flowing style with a large, prominent initial "L".