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### **BY EMAIL and RESS**

August 13, 2012

Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> Floor  
Toronto, Ontario  
M4P 1E4

### **Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

### **Re: EB-2012-0300 – Great Lakes Power Transmission – Confidentiality and Issues List**

We are counsel to the School Energy Coalition (“SEC”). Pursuant to Procedural Order #1, these are the submissions of SEC on a) Great Lakes Power Transmission’s (“GLPT”) claim for confidentiality treatment over certain documents and b) the Draft Issues List.

#### ***Confidentiality***

SEC does not object to the GLPT’s request for confidentiality treatment but submits that GLPT should be required to place on the public record redacted versions of the documents.

#### ***Draft Issues List***

SEC submits it would preferable for the Board to adopt a Final Issues List that is consistent with wording and issues adopted in other rate applications (with relevant modifications) instead of the issue categories proposed in the Draft Issues List. SEC therefore proposes the following issues list:

##### **1. General**

- 1.1 Has GLPT responded appropriately to all relevant Board directions from previous proceedings?
- 1.2 Is the overall increase in 2013 and 2014 revenue requirement reasonable?

##### **2. Rate Base**

- 2.1 Is the proposed rate base for 2013 and 2014 appropriate?
- 2.2 Is the working capital allowance for 2013 and 2014 appropriate?
- 2.3 Is the capital expenditure forecast for 2013 and 2014 appropriate?
- 2.4 Is the capitalization policy and allocation procedure appropriate?

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**3. Load Forecast and Revenue Forecast**

- 3.1 Is the load forecast and methodology appropriate?
- 3.2 Is the impact of CDM appropriately reflected in the load forecast??
- 3.3 Are Other Revenues forecasts appropriate?

**4. Operations, Maintenance & Administration Costs**

- 4.1 Are the overall OM&A forecast in 2013 and 2014 appropriate?
- 4.2 Are the proposed spending levels for Share Services and other costs in 2013 and 2014 appropriate?
- 4.3 Is the proposed level of depreciation/amortization expense for 2013 and 2014 appropriate?
- 4.4 Are the 2013 and 2014 compensation costs and employee levels appropriate?
- 4.5 Is the 2013 and 2014 forecast of property taxes appropriate?
- 4.6 Is the 2013 and 2014 forecast of income taxes appropriate?

**5. Cost of Capital**

- 5.1 Is the proposed capital structure, rate of return on equity and short term debt rate appropriate?
- 5.2 Is the proposed long term debt rate appropriate?

**6. Deferral/Variance Accounts**

- 6.1 Are the proposed amounts, disposition and continuances of GLPT's existing Deferral and Variance Account appropriate?
- 6.2 Are the proposed new Deferral and Variance Account appropriate?

**7. Cost Allocation**

- 7.1 Is the cost allocation proposed by GLPT appropriate?

**8. Rate Design**

- 8.1 Is the proposed charge determinate forecast appropriate?
- 8.2 Is the proposed calculation of the Uniform Transmission Rates appropriate?

**9. Modified International Financial Reporting Standards**

- 9.1 Is the proposed revenue requirement determined using modified IFRS appropriate?

SEC has circulated its proposed issues list to other ratepayer intervenors and has been asked by VECC to relay their support for it.

Yours very truly,  
**Jay Shepherd P.C.**

*Signed by*

Mark Rubenstein

cc: Applicant and Intervenors (by email)