

10 July 2013

Ontario Energy Board
2300 Yonge St., 27th Floor
Toronto, ON, M4P 1E4

Attn: Ms Kirsten Walli, Board Secretary

By electronic filing and e-mail

Dear Ms Walli:

Re: IESO June 28th filing

We are in receipt of Mr. Wagner's letter dated July 10th addressed to the Board on behalf of the IESO in which he seeks to have the material filed on June 28th treated as a letter of comment rather than evidence.

The IESO filing includes numerous factual assertions and includes voluminous reports on the specifics of the matters before the Board. It was filed on the day set out in the Board's procedural order for the filing of intervenor evidence. GEC's experts have spent considerable time digesting the filing and researching related matters to allow for the generation of our 40 interrogatories to IESO. Apparently, confronted by these interrogatories, the IESO now seeks to have its evidence treated as a comment, presumably to avoid having to respond to the IRs. We note that Enbridge has already relied upon the IESO evidence and specifically referred to it as "evidence" in its interrogatories to GEC (Ex.L.EGD.GEC.2). Enbridge has interpreted the IESO reports as pertaining to winter peak whereas on their face the documents speak to issues at summer peak (i.e. the electrical peak). Many of GEC's IRs to IESO address this distinction and seek to clarify the GTA-specific implications that the IESO letter suggests. Accordingly, if IESO is not obliged to respond to interrogatories, the record will remain needlessly confused.

GEC submits that the letter of comment process should be a mechanism to allow the general public to make their general concerns known to the Board, not a means for a sophisticated, regulated, public entity to offer detailed technical evidence on the specifics before the Board. IESO's attempt to file lengthy, detailed reports and then avoid any testing of the evidence would impair the integrity of this process. GEC urges the Board to call upon IESO to respond to GEC's interrogatories.

Sincerely,



David Poch
Cc: all parties