

September 18, 2014

COURIER

Ontario Energy Board
27th Floor
2300 Yonge Street
Toronto ON M4P 1E4

Attention: Ms. K. Walli, Board Secretary

Dear Ms. Walli:

Re: Revised Request for Confidential Treatment of Information Associated with Great Lakes Power Transmission LP's Application for 2015 and 2016 Transmission Rates (EB-2014-0238)

We are counsel to Great Lakes Power Transmission LP ("GLPT") in respect of GLPT's Application for 2015 and 2016 Transmission Rates (EB-2014-0238) (the "Application"). The Application was filed on July 14, 2014. In parallel with the filing of the Application, we filed a request for the confidential treatment of certain information which is intended to form part of the written evidence (the "Confidentiality Request").

The purpose of this letter is to respond to Board staff's September 16, 2014 submissions regarding the extent of the Confidentiality Request. To be responsive to those submissions, we have filed in confidence with the Board a more selectively redacted version of the Confidentiality Request. In addition, we have attached hereto in **Attachment "A"** a revised version of Exhibit 3, Tab 1, Schedule 2, with only the specific load customer-related information redacted. We are seeking confidential treatment only for this redacted information, in order to protect the confidentiality of certain information that, if disclosed, would prejudice GLPT's load customers.

Yours truly,


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cc: Richard Battista, OEB
All intervenors

ATTACHMENT "A"

REVISED REDACTED VERSION OF EXHIBIT 3, TAB 1, SCHEDULE 2

Exhibit 3, Tab 1, Schedule 2 (Charge Determinant Forecast)

1.0 Methodology

GLPT has developed a charge determinant forecast for directly connected customers using the same methodology as used in its 2013-14 rate application, EB-2012-0300. As demonstrated in Exhibit 8, Tab 1, Schedule 1, the results of this forecast are combined with the approved charge determinants for Ontario's other three electricity transmitters in order to derive the UTR in Ontario.

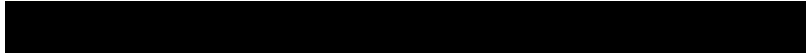
GLPT's approach to forecasting its customer loads is to take the historical average of the previous five years for each customer, and adjust that average to account for any forecasted variances that are known and measurable. GLPT identifies these variances through direct communication with its connected customers.

1.1 Historical Information

The historical information used by GLPT is published by the IESO for Ontario's transmitters. Each month, the IESO makes available a number of reports that provide information on loads and peaks for each of the transmitters in Ontario. The *Transmitter Reconciliation Final Data File* is created on a monthly basis, and details the monthly peaks and the total revenue generated for each of GLPT's connected customers by asset pool.¹ GLPT has analyzed this report for each of the months in the period January 2009 to December 2013, extracted the monthly peaks by asset pool, and calculated the five year average for each pool by customer.

¹ The three asset pools are Network, Line Connection, and Transformation Connection.

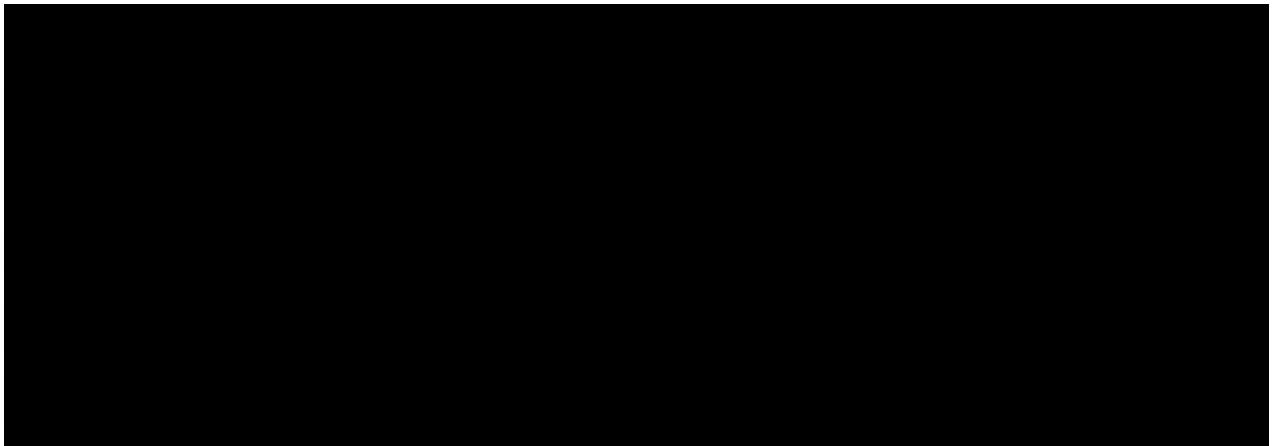
Table 3-1-2 A displays the historical consumption patterns and the five-year average for GLPT's seven current and former directly connected customers. In the table, each of GLPT's seven directly connected customers was assigned a letter, 'A' through 'G', in no particular order.



Year	Historical Annual Charge Determinants	Grand Total Load for GLPT MW
2009	Net - MW	3,875.2
	LC - MW	2,922.3
	TC - MW	1,012.9
2010	Net - MW	3,538.9
	LC - MW	2,712.3
	TC - MW	585.0
2011	Net - MW	3,339.7
	LC - MW	2,742.4
	TC - MW	558.8
2012	Net - MW	3,183.1
	LC - MW	2,588.7
	TC - MW	421.6
2013	Net - MW	3,186.3
	LC - MW	2,547.7
	TC - MW	438.3
5-Yr Avg	Net - MW	3,424.6
	LC - MW	2,702.7
	TC - MW	603.3

1.2 Known and Measurable Variations

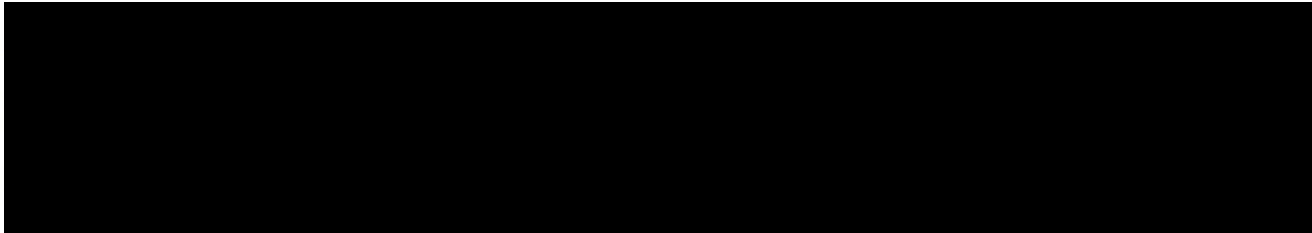
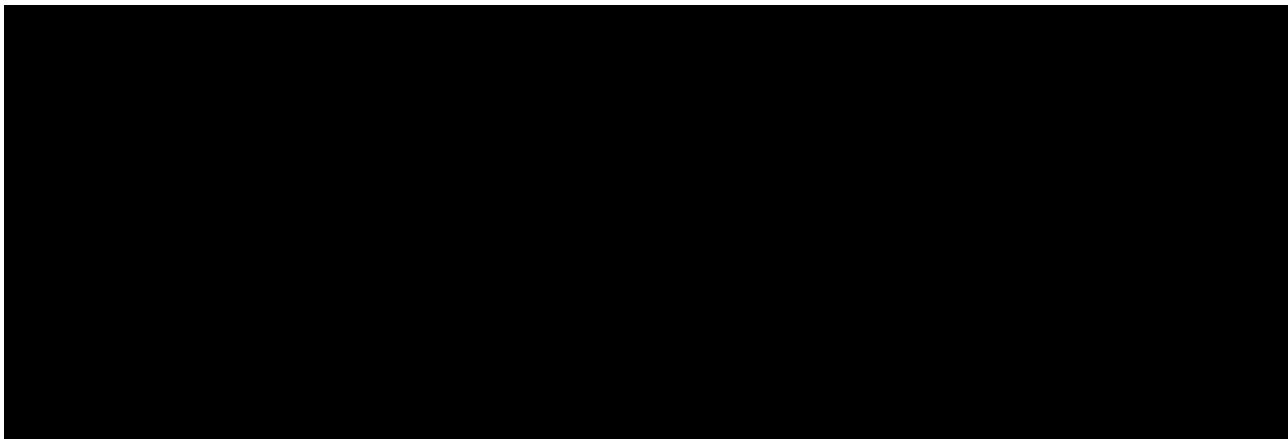
1.2.1 Changes to Customer Landscape



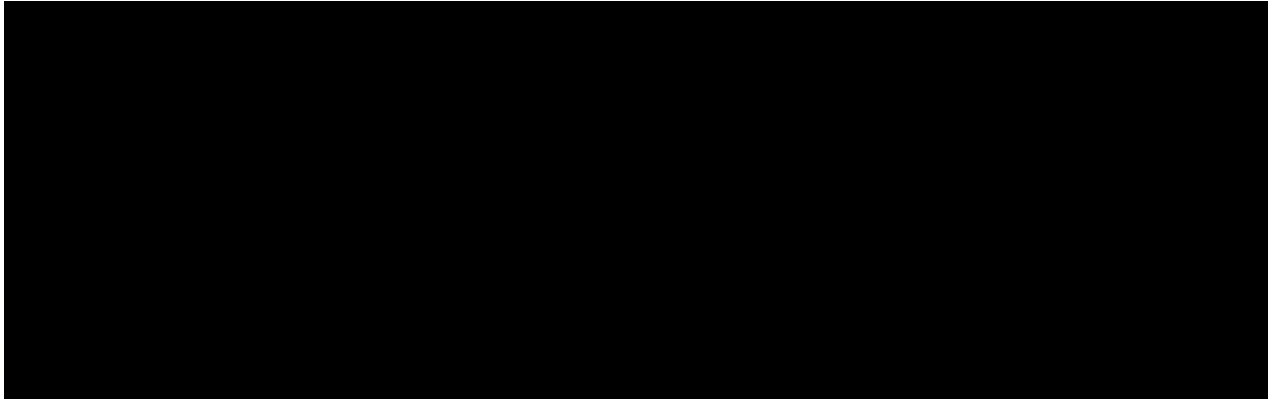
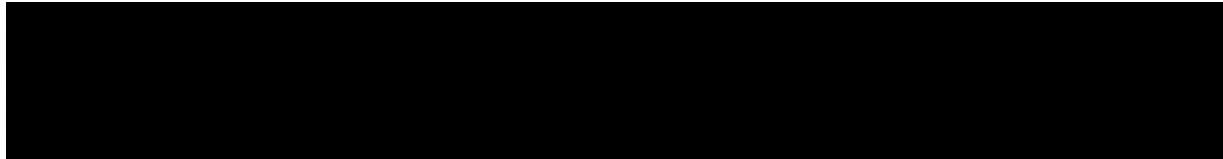


1.2.2 Communication

Aside from the customers described in Section 1.2.1 above, GLPT has five active directly connected customers. As in prior applications, GLPT is still of the opinion that the most effective method for developing a forward-looking forecast would be through direct communication with those customers. In an effort to identify known and measurable changes that are forecast to occur in the test years, GLPT engaged in communications with the five active customers referred to above. Information was gathered through preliminary regional planning activities, stakeholder sessions, customer impact assessments and direct discussions.



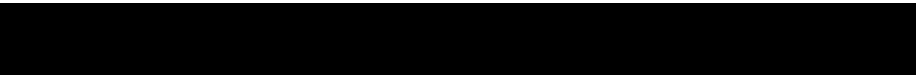
² Given the consumption patterns of this particular customer, GLPT assumes that the incremental load will affect all three pools equally



1.3 Results by Delivery Point

GLPT has applied the historical trend and adjusted it to account for known and measurable forward-looking customer information to forecast the charge determinants in 2015 and 2016.

This information is displayed in *Table 3-2-1 B* below.



Year	Annual Charge Determinants	Total Load for GLPT MW
2015	Net MW	3,489.2
	LC MW	2,725.6
	TC MW	626.3
Year	Annual Charge Determinants	Total Load for GLPT MW
2016	Net MW	3,498.2
	LC MW	2,734.6
	TC MW	635.3

2.0 Proposed Charge Determinants

GLPT's calculations produce an estimated value for the 2015 charge determinants for each pool which is slightly higher than the approved figures from EB-2012-0300. In 2016, GLPT is projecting a slight increase in charge determinants for the reasons described in Section 1.2.2 above. These variances are demonstrated in *Table 3-1-2 C* and *Table 3-1-2 D* below.

Table 3-1-2 C – Charge Determinants – Approved vs. 2015 Proposed

	Annual Charge Determinants (MW)		
	Network	Line Connection	Transformation Connection
Approved GLPT per EB-2012-0300	3,445.341	2,461.434	455.652
GLPT 2015 proposal	3,489.236	2,725.624	626.252
Variance	43.895	264.190	170.600

Table 3-1-2 D – Charge Determinants – 2015 Proposed vs. 2016 Proposed

	Annual Charge Determinants (MW)		
	Network	Line Connection	Transformation Connection
GLPT 2015 proposal	3,489.236	2,725.624	626.252
GLPT 2016 proposal	3,498.236	2,734.624	635.252
Variance	9.000	9.000	9.000

3.0 Variance Analysis

GLPT has prepared *Table 3-1-2 E* to display the actual and forecast charge determinants for 2010-2014 compared to the charge determinants used in the calculation of the UTR for the same

years. These determinants are only related to customers connected to GLPT’s transmission system.

Table 3-1-2 E – Charge Determinant Variance Analysis

	Network	Line Connection	Transformation Connection
2010 UTR Forecast	4,150	2,847	2,778
2010 Actual	3,539	2,712	585
<i>2010 Variance</i>	<i>(612)</i>	<i>(135)</i>	<i>(2,193)</i>
<i>% Variance</i>	<i>-14.7%</i>	<i>-4.7%</i>	<i>-78.9%</i>
2011 UTR Forecast	4,020	2,939	1,058
2011 Actual	3,340	2,742	559
<i>2011 Variance</i>	<i>(680)</i>	<i>(197)</i>	<i>(499)</i>
<i>% Variance</i>	<i>-16.9%</i>	<i>-6.7%</i>	<i>-47.2%</i>
2012 UTR Forecast	3,955	2,937	985
2012 Actual	3,183	2,589	422
<i>2012 Variance</i>	<i>(771)</i>	<i>(349)</i>	<i>(564)</i>
<i>% Variance</i>	<i>-19.5%</i>	<i>-11.9%</i>	<i>-57.2%</i>
2013 UTR Forecast	3,445	2,461	456
2013 Actual	3,186	2,548	438
<i>2013 Variance</i>	<i>(259)</i>	<i>86</i>	<i>(17)</i>
<i>% Variance</i>	<i>-7.5%</i>	<i>3.5%</i>	<i>-3.8%</i>
2014 UTR Forecast	3,445	2,461	456
2014 Forecast	3,583	2,556	537
<i>2014 Variance</i>	<i>138</i>	<i>94</i>	<i>81</i>
<i>% Variance</i>	<i>4.0%</i>	<i>3.8%</i>	<i>17.9%</i>

GLPT’s load forecasts have historically been higher than actual for the reasons described below.

3.1 Network Variances

The largest variances in the network pool are found in the years 2010-2012. The main driver behind these decreases was [REDACTED]

[REDACTED]

[REDACTED] As a result, the forecasts for 2010, 2011 and 2012 did not incorporate [REDACTED] and the actual peak loads were lower than forecast. The increase in the 2014 forecast is driven primarily by [REDACTED]

3.2 Line Connection Variances

The 2010-2012 variances in the line connection pool were also affected by [REDACTED]

[REDACTED]

[REDACTED] Overall, GLPT's forecasts related to the line connection pool have been reasonably accurate. The increase in the 2014 forecast is driven primarily by [REDACTED]

3.3 Transformation Connection Variances

The transformation connection pool has experienced the most significant variances on a percentage basis. For 2010-2012, the forecast was affected by [REDACTED]

[REDACTED]

[REDACTED] Further to this, in 2010 GLPT's UTR forecast included a forecast for transformation charges related to [REDACTED]

[REDACTED]

The increase in the 2014 forecast is driven primarily by [REDACTED]

[REDACTED]

3.4 Summary

The forecast variances that have occurred have been the result of changes in circumstances that GLPT could not have been aware of at the time of preparing its forecast. Any alternative method for calculating a forecast would have been subject to the same variances. In addition, GLPT's charge determinant forecast makes up approximately 1% of the total forecast of all transmitters in the UTR calculation. Therefore, GLPT believes its forecasting techniques are sufficient and reliable, especially when giving consideration to the materiality of the forecast for calculating the UTR.