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SENT BY E-MAIL

Toronto, December 1, 2008

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St., Suite 2700
PO Box 2319
Toronto, ON, M4P 1E4

Dear Ms. Walli:

**RE: Transmission Connections Cost Responsibility Review
Board File No.: EB-2008-0003**

Please find enclosed the submissions of Brookfield Energy Marketing Inc. in the above-referenced matter.

Yours very truly,

Ogilvy Renault LLP



Charles Keizer

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IN THE MATTER OF the *Ontario Energy Board Act*,
1998, S.O. 1998, C. 15, Schedule B;

AND IN THE MATTER OF a Notice of Proposal to
Amend a Code issued by the Ontario Energy Board
relating to proposed amendments to the Transmission
System Code.

SUBMISSIONS OF BROOKFIELD ENERGY MARKETING INC.

These are the submissions of Brookfield Energy Marketing Inc. (“Brookfield”) in respect of the Ontario Energy Board’s Notice of Proposal to Amend a Code relating to proposed amendments to the Transmission System Code (EB-2008-0003).

Brookfield manages the power operations of Brookfield Renewable Power Inc. through its energy marketing platform that is responsible for all physical and financial sales of energy products across North American markets. Brookfield manages close to 1200MW of generating assets in Ontario, including 21 hydro stations located on 10 separate river systems, combined cycle gas-fired facility (Lake Superior Power) and the 189MW Prince Wind Farm – Canada’s largest.

Brookfield notes that it is an indirect affiliate of Great Lakes Power Transmission Inc. (“GLPT”), an intervenor in these proceedings. However, Brookfield further notes that it operates independently of GLPT and in accordance with OEB approved protocols with respect to the separation of operation between GLPT and Brookfield. Accordingly, the position of Brookfield is that these proceedings are independent to that of GLPT and are not formulated in conjunction with GLPT.

Position of Brookfield

Definition of Renewable Resource Cluster

The Board’s definition of renewable resource cluster is as follows: “Renewable Resource Cluster means a defined geographic area identified as such in the integrated power system plan approved under Part II.2 of the Electricity Act or in a direction issued by the Minister to the OEB

under Section 25.32 of the Electricity Act where resources suitable for renewable generation are present and **where the renewable generation facilities are not or are not expected to be, owned or controlled by the same person.**”

Of particular note is the condition imposed on a renewable resource cluster being the phrase “where the renewable generation facilities are not or are not expected to be, owned or controlled by the same person.”

The concept of enabler facility and renewable resource cluster considered in the proposed amendments emanates from the IPSP filed by the OPA.

Based on a review of the OPA’s evidence in the IPSP proceeding, the evidence provides as follows with respect to renewable resource clusters:

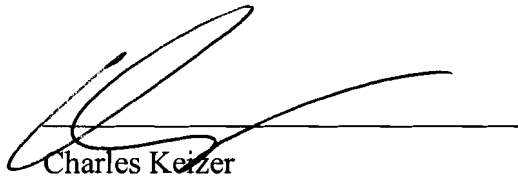
“Exhibit E-2-2 identifies the specific transmission lines that are required to connect groups of potential wind and hydroelectric sites to the main transmission network. Ten clusters of sites have been identified, as shown in Table 13. A cluster is a set of individual sites within close geographical proximity to each other, whose development could be facilitated by having the sites share a single connection line to the Ontario transmission network. A single connection line will make all sites in a cluster more economic to develop than they would otherwise be. Some of these single connection lines are termed “enabler lines”, as discussed in Exhibit E-2-2. {Ex. D, Sch. 1, Tab 2, 23 – 24)”

At no point does the criteria of ownership apply. It relates only to the resource and the individual sites any one of which does not make the construction of the transmission line feasible. The Board’s proposed definition of renewable resource cluster is imposing a new condition that has not previously existed. Because it is a condition that ultimately forms part of the Transmission System Code and which governs the connection of developed resources, this condition will ultimately determine the parameters of any further OPA procurements related to renewable resource clusters. Brookfield respectfully submits that it is not for the Board through its proposed amendment process to directly or indirectly prescribe the terms of the procurement or to narrow the OPA’s discretion in this regard.

As a result, the Board should delete the phrase “and where the renewable generation facilities are not or are not expected to be, owned or controlled by the same person.”

All of which is respectfully submitted this 1st day of December, 2008.

BROOKFIELD ENERGY MARKETING INC.
By its counsel,



Charles Keizer