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ONTARIO ENERGY BOARD

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Toronto, April 18, 2007

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

Dear Ms. Walli:

RE: 2008 Distributor Rebasing
File No.: EB-2006-0330

We are legal counsel on behalf of Great Lakes Power Limited ("GLPL"). On behalf of GLPL, we are writing to comment on the proposed list (the "List") of distributors to be rebased for 2008 rates as part of the Ontario Energy Board's (the "Board") multi-year electricity distribution rate setting plan (the "Plan"). According to the List, GLPL has been included in the first tranche of the Plan. For the reasons set out below, GLPL would like to proceed as follows:

1. GLPL will file by August 15, 2007 a distribution rate application for a 2007 test year; and
2. GLPL's inclusion in the Plan, on a full test year basis, be deferred to the second tranche proposed by the Board.

In 2002, GLPL submitted a distribution rate application based upon proforma financial statements for 2000. GLPL was granted an interim rate order that was made a final rate order as part of Bill 210. As a result, a Board approved base year for rates was not established.

Because of a number of factors, including the low density of GLPL's distribution service territory, GLPL has very complex issues to resolve relating to rate mitigation and revenue requirement recovery. Since 2003, GLPL has worked to try to establish an appropriate mechanism to mitigate rate impacts. GLPL has undertaken to do so while incurring rates of return well below those enjoyed by other distributors in Ontario. Because of these continuing efforts, GLPL deferred filing a distribution rate application as part of the 2006 EDR process and was therefore unable to apply for a 2007 rate adjustment based on the Board's 2007 IRM Model.

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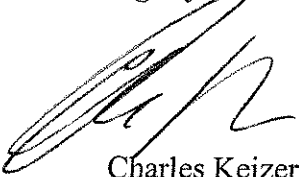
Because of the aforementioned complexities, GLPL believes that it would be better able to manage rate impacts and recovery of its revenue requirement, if it first established a Board approved base year on which it could build a full test year filing as part of the Board's multi-year process.

GLPL is completing the preparation of a distribution rate application based on a 2007 test year that follows the Board's *Filing Requirements For Transmission And Distribution Rate Applications*. GLPL continues to work to establish an appropriate mechanism to mitigate rate impacts. Notwithstanding the result of these efforts, GLPL intends to file its 2007 rate application within the time period for filing under the first tranche - August 15, 2007. Subsequent to establishing a 2007 base year for rates, GLPL will seek an adjustment in 2008 based upon the resulting 2007 rates in accordance with the Board's process and file a forward test year application for 2009 as part of the Board's second tranche.

GLPL submits that the foregoing plan provides for an orderly process in which to establish distribution rates for GLPL's distribution customers.

Yours very truly,

Ogilvy Renault LLP



Charles Keizer

CK/sb

c.c. Tim Lavoie, Great Lakes Power Limited