



26 January 2007

Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 26th Floor
Toronto ON M4P 1E4

Sent by email: boardsec@oeb.gov.on.ca

Re: **OEB Files EB-2006-0189 and EB-2006-0200**
Hydro One Networks Inc. and Great Lakes Power Limited
Applications for Approval of Connection Procedures pursuant to the
Transmission System Code

Dear Ms Walli:

With respect to the procedures proposed by Hydro One Networks, Inc and Great Lakes Power Limited, we offer this submission:

The procedures proposed by both HONI and GLPL appear to be consistent with the TSC and existing practice. They appear to strike a reasonable balance between the interests of the transmitters, connecting customers and other pool customers. While AMPCO would prefer simpler procedures and process than have been proposed, we recognize that transmission connections are complex both technically and commercially and the procedures must recognize the interests of a number of stakeholders.

AMPCO has reviewed each proposal, as well as the interrogatories from all parties and the applicants' responses.

We believe both GLPL and HONI should have the same or equivalent security deposit procedures. The process proposed by Hydro One (Table 1, page 22), recognizes that a customer's credit worthiness should be a factor in determination of deposit requirements. This is an accepted and normal aspect of other utility-customer business relationships and we believe it should be applied consistently in this process as well. AMPCO submits that GLPL should apply a similar procedure, so that customers are charged deposits that recognize not only the amount of money at risk, but also the credit worthiness of the customer.

AMPCO also suggests adoption of a single connection procedure, as this would reduce the overall administrative and regulatory burdens and complexity for customers that may operate in both the HONI and GLPL service areas. Except for the issue noted above with respect to security deposits, the two applications appear to be equivalent.



Sincerely,

A handwritten signature in blue ink, appearing to read "Adam S. White", with a long horizontal stroke extending to the right.

Adam S. White
President

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