

STIKEMAN ELLIOTT

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June 19, 2007
File No.: 120315.1001

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

Dear Ms. Walli:

**Re: Hydro One Networks Inc. – Access to Lands Application,
OEB File No. EB-2007-0051**

**Hydro One Networks Inc. – Leave to Construct Bruce-to-Milton
Transmission Reinforcement, OEB File No. EB-2007-0050**

Further to the Board's Procedural Orders No. 1 in the captioned proceedings, we enclose:

- (a) Notice of Motion of the Ontario Power Authority (OPA) dated June 19, 2007; and
- (b) Responding Submissions of the OPA to Preliminary Motions of Powerline Connections dated June 19, 2007.

Yours truly,


Glenn Zacher

/sc
Encl.

cc: Glen MacDonald (HONI)
Intervenors

TORONTO
MONTREAL
OTTAWA
CALGARY
VANCOUVER
NEW YORK
LONDON
SYDNEY

EB-2007-0050

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, (Schedule B) (the “**Act**”);

AND IN THE MATTER OF an Application by Hydro One Networks Inc. pursuant to section 92 of the Act, for an Order or Orders granting leave to construct a transmission reinforcement project between the Bruce Power Facility and the Milton Switching Station, all in the Province of Ontario.

EB-2007-0051

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, (Schedule B) (the “**Act**”);

AND IN THE MATTER OF an Application by Hydro One Networks Inc., pursuant to section 98 of the Act, for an Interim Order granting access to land in connection with the Applicant’s request for leave to construct a new transmission line between the Bruce Power Facility and the Milton Switching Station.

**NOTICE OF MOTION
OF THE ONTARIO POWER AUTHORITY
(returnable June 25 and/or 26, 2007)**

The Ontario Power Authority (“OPA”) will make a motion to the Board on June 25 and/or 26, 2007 at 9.30 a.m. or as soon after that time as the motion can be heard at the Board’s North Hearing Room, 25th floor, 2300 Yonge Street, Toronto, Ontario MP4 1E4.

PROPOSED METHOD OF HEARING: The motion is to be heard orally.

THE MOTION IS FOR:

- a) An Order, that the OPA be granted leave to file written submissions and to make oral submissions in response to Powerline Connections’

preliminary motions which are scheduled to be heard by the Board on June 25 and/or 26, 2007; and

- b) Alternatively, the OPA be granted, intervenor status in Application No. EB-2007-0050 (the "Leave to Construct Application") and No. EB-2007-0051 (the "Access Application") (the Leave to Construct Application and Access Application are collectively referred to herein as the "Applications")

THE GROUNDS FOR THE MOTION ARE:

- a) The OPA has a direct interest in Powerline Connection's preliminary motions to adjourn the Applications. In particular, the OPA has an interest in addressing the following stated grounds for the motions:
- The Applications are premature and should be stayed because the Board has not yet completed its review of the OPA's Integrated Power System Plan ("IPSP"); and
 - The Applications are premature and should be stayed because the proposed Bruce-to-Milton transmission line does not comply with Ontario Regulation 424/04 and the OPA does not have the authority to advance projects that do not comply with Ontario Regulation 424/04.
- b) The OPA also has a direct interest in the subject matter of the Applications. The OPA is the power system planner for the Province of Ontario and is specifically mandated to "ensure adequate, reliable and secure electricity service and resources in Ontario".
- c) If the OPA is granted leave to intervene in the Applications:
- i) The OPA may, in addition to assisting HONI in answering interrogatories and serving as a witness for HONI, make submissions where its interests are directly implicated.

- ii) The OPA will not seek an award of costs.
- iii) The OPA's representatives, for the purposes of service and delivery of documents in the proceeding, will remain as:

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Regulatory Coordinator
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THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion:

- a) EB-2007-0050, Prefiled Evidence of HONI;
- b) Such further materials as the Board may permit.

June 19, 2007

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Solicitors for the OPA

TO: Hydro One Networks Inc.

AND TO: Intervenors

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AND IN THE MATTER OF an Application by Hydro One Networks Inc. pursuant to section 92 of the Act, for an Order or Orders
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all in the Province of Ontario.**

EB-2007-0050

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Power Facility and the Milton Switching Station.**

EB-2007-0051

NOTICE OF MOTION

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