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December 12, 2007

VIA EMAIL AND COURIER

Kirstin Walli, Board Secretary  
Ontario Energy Board  
PO Box 2319  
Suite 2700  
2300 Yonge Street  
Toronto, Ontario M4P 1E4

Dear Ms. Walli:

**RE: Ontario Power Authority Application – Integrated Power System Plan  
Ontario Energy Board File Number: EB-2007-0707  
Comments on the draft Issues List**

We are counsel to Invenergy Wind Canada ULC ("Invenergy Canada"), which is an intervenor registered in the above-captioned proceeding.

As an intervenor to the IPSP proceeding, we have reviewed the draft list of issues (the "Draft Issues List") prepared by the Ontario Power Authority which the Board would use in its review of the IPSP. Although the wording of section 6 of Issue (1) is general enough to potentially encompass any issues related to transmission system, we take the view that the following two specific sub issues related to transmission upgrades including enabler lines (the "Enabler Line Issues") should be reviewed and determined by the Board:

- (1) Should the current transmission cost allocation policies be modified to promote the development of renewable energy in Ontario? If so, how?
- (2) Should the current transmission system codes and approval policies be modified to facilitate the development and integration of renewable energy in a cost-effective manner? If so, how?

However, there is no need to incorporate the Enabler Lines Issues to the Draft Issues List if the Board decides, based on valid reasons, that it will consider and determine them in a separate setting, including but not limited to (1) as part of the Board's formalization of its 2008-2011

December 12, 2007

Page Two

Business Plan, or (2) a standalone review initiative in which the Board will examine the principles, methodologies, filing requirements and model design in respect of new cost allocation policies and franchise rights for electricity transmitters and generators in connection with renewable energy resources.

If the Board does not intend to address the Enabler Line Issues in the IPSP proceeding, we respectfully submit that the current cost allocation policies and franchise rights for transmission systems with respect to renewable energy resources should be addressed as a priority item on the Board's agenda as soon as possible, and in any event, before the end of 2008.

Please feel free to contact us should you have any questions.

Yours truly,

**BENNETT JONES LLP**

A handwritten signature in black ink, appearing to read "John Rook", with a long horizontal line extending to the right.

John Rook

c: Ontario Power Authority, applicant (by email: [Miriam.heinz@powerauthority.on.ca](mailto:Miriam.heinz@powerauthority.on.ca))