

Exemption Applicant or IMO Staff Comments on Third Party Submission

Exemption Application ID #: 01-1191

Submit this form by e-mail to: exemptions@theimo.com

Subject: Exemption Applicant or IMO Staff Comments on Third Party Submission

All information submitted in this process will be used by the *IMO* solely in support of its obligations under the "Electricity Act, 1998", the "Ontario Energy Board Act, 1998", the "Market Rules" and associated policies, standards and procedures and its licence. All submitted information will be assigned the appropriate confidentiality level upon receipt.

Terms and acronyms used in this Form that are italicized have the meanings ascribed thereto in Chapter 11 of the "Market Rules".

PART 1 – GENERAL INFORMATION

Organization Name: Great Lakes Power Limited - Distribition Division		
Market Participant / Metering Service Provider No.:	IMO Help Centre (IHC) Ticket No. (if applicable):	
Date: May 19, 2004		
Address: 2 Sackville Road	-	
City/Town: Sault Ste. Marie		
Postal/Zip Code: P6B6J6	Country: Canada	
Province/State: Ontario	Fax No.: 705 7596110	
Email Address: rmerrett@glp.on.ca		
URL: glp.on.ca		

PART 2 – COMMENTS BY EXEMPTION APPLICANT OR IMO STAFF ON THIRD PARTY **SUBMISSION**

These comments are made by IMO staff	
or	
by the exemption applicant	
in response to a third party submission submitted by Sault PUC concerning Exemption ID #: 0	1-1191
The third party submission made related to:	
☐ the Exemption Application	
the Request to Transfer the <i>Exemption</i>	
the Notice of Reconsideration/Removal of the <i>Exemption</i>	
These comments should be as specific as possible.	
EXEMPTION 1191, comments on the PUC submission. The PUC have made several valid points in their submission. The four meter points currently owned by GLP at Third Line TS supplying the Sault PUC (GL1SM,GL1TA,GL2SM and GL2TA) consist of only a single meter per meter point. There is not a MAIN and an ALTERNATE meter per meter point. Each of these meters has a seal expiry date of 2006, therefore at a minimum each meter must be replaced before December 31 2006. The PUC have stated that they currently have consultants reviewing their metering options in preparation for December 2006 when changes must occur; i.e. new metering with PUC ownership. There is a strong possibility that the "new" metering will be located outside the fence at Third Line TS perhaps even off site. This would then make the new 115Kv VT's (2 sets) surplus to any IMO metering needs with ~\$200K of stranded GLP assets at Third Line TS.If the PUC were to decide to locate their new metering at Third Line in the same location as the existing metering then the new VT's would be used for this metering. The PUC are not in a position at this time to know where their new metering will be located. Sault PUC has indicated that by Oct 1 2004 they will have made a decision as to where they will locate their new meters. This MSP has a letter from the Sault Ste. Marie PUC to backup this statement. They intend to start working on the replacement of the existing meters as soon as this decision is made and fully intend to have the installations completed prior to the seal expiry of the existing meters. Can the final decision re: exemption 1191 be delayed until the PUC have decided where they will locate their metering? There is a very significant dollar and resource impact on GLP if new 115Kv VT's are placed in service but only used for a matter of months before becoming surplus to IMO metering needs. Similar rational will apply at Clergue TS with the supply to St Mary's Paper.	
The four St Mary's Paper 12Kv feeders PC1, PC2, PC3 and PC4 each have a single billing meter is not a MAIN and ALTERNATE meter per feeder. Meter seal expiry dates are PC1 2005, PC2	r, there 2006,
PC3 2007 and PC4 2007. When the existing meters are replaced with a new metering scheme the high probability that it also will be located "outside" of the fence at Clergue TS. The new 12Kv	
VT's (2 sets) that will have been placed in service would also then not be required for the St Mar Paper IMO "new" metering needs, again leaving a stranded GLP asset at Clergue TS. St Mar	ry's
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Paper has indicated that by Oct 1 2004 they will have made a decision as to where they will locate their new meters. This MSP has a letter from St. Marys Paper Company to backup this statement. They intend to start working on the replacement of the existing meters as soon as this decision is made and fully intend to have the installations completed prior to the seal expiry of the existing meters.

Again can the final decision re: exemption 1191 also be delayed until St Mary's Paper have made a final decision on where their new metering will be located? There is a very significant dollar and resource impact on GLP if new 12Kv VT's are placed in service but only used for a matter of months before becoming surplus to IMO metering needs.

PART 3 – SUPPORTING DOCUMENTATION ATTACHED

List any supporting documentation that is attached.
1. Letter of Intent by Sualt Ste. Marie PUC
2. Letter of Intent by St Marys Paper
3.
4.
5.

Part 4 – Certification

The <i>exemption applicant</i> making these comments hereby declares that the information contained in and submitted in support of this document is, to the best of the <i>exemption applicant's</i> knowledge, accurate and not misleading.	
Ron J. Merrett Name	Group Leader / QA Tech MSP & Metering Services Title