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Susan Frank

Vice President and Chief Regulatory Officer
Regulatory Affairs

BY COURIER

May 7, 2012

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

Dear Ms. Walli:

EB-2011-0140 – OEB East-West Tie Line – Hydro One Networks Inc. Submission

Please find attached Hydro One Networks Inc.'s submission in the above-mentioned proceeding.

A copy of this letter and the attached submission have been filed in text-searchable electronic form through the Ontario Energy Board's Regulatory Electronic Submission System and the confirmation slip is enclosed.

Sincerely,

ORIGINAL SIGNED BY SUSAN FRANK

Susan Frank

cc intervenors

Hydro One Networks' Inc. Submission Information Disclosure

On April 26, 2012, the Ontario Energy Board (the "Board") issued a letter to George Vegh in the East-West Tie designation proceeding (EB-2011-0140) regarding Item 19 on the Issues List, pertaining to information disclosure by the incumbent transmitters. The letter includes direction to Hydro One Networks Inc. ("HONI") to:

- where HONI takes the position that certain information should not be provided to all parties to the proceeding, detail the reasons why; and
- where HONI takes the position that certain documents are confidential, indicate whether the Board's *Practice Direction on Confidential Filings*, and the form of declaration and undertaking therein, provides sufficient protection for the filing of such documents.

Provision of Incumbent Information

HONI is generally prepared to file the documents identified in HONI's *Documents List* (reproduced below) in this proceeding, with some exceptions. However, HONI also acknowledges that there are certain documents that HONI believes the release of which may actually be unhelpful to the Board's designation process. These will be discussed in turn below. Where HONI indicates below that it is prepared to file a particular document in this proceeding, it should be understood to be contingent on the Board's direction to file it.

1. Preliminary Development

a) *HONI* Project Definition Report

- **study estimates** for various project implementation options for proposed East-West Tie line
- contains: scope of work; assumptions (line, station, environmental, real estate, corporate communication); technical comparison tables (line, station); risk assessment; preliminary schedule; cost breakdown (development, implementation)
- prepared: June 4, 2010

HONI respectfully recommends that this report not be filed in this proceeding, as the comprehensive and detailed nature of the information contained in this report could unintentionally skew the proposals by building on work previously completed by HONI. If this reduces the creativity and diversity of proposals, it could be inconsistent with the objectives of the designation process. Furthermore, it may also render it more difficult for the Board to differentiate and assess proponents based on the sophistication and merit of their filed plans.

b) *SNC Lavalin* Study Estimates Report

- **study estimates** for various line options and associated breaker installations and line terminations for proposed East-West Tie line
- contains: engineering sketches; bill of major materials; assumptions; scope description; project schedule; cost estimate; work breakdown structure; analysis (contingency, risk, escalation)
- prepared: May 19, 2010

Beyond the comments in (a) above, which also apply to this report, HONI cannot offer to provide a copy of this report because a confidentiality agreement between HONI and SNC Lavalin prohibits release of this report to third parties.

c) *Dillon Consulting Limited Services Plan*

- **work plan and budget** for consultation activities for proposed East-West Tie line in relation to Terms of Reference and Individual Environmental Assessment, including Canadian Environment Assessment Agency screening, OEB section 92 submission activities, First Nations and Métis consultation, and Biodiversity Initiative activities
- prepared: January 26, 2010

Due to the commercial sensitivity associated with portions of this document, HONI is prepared to work with the consultant to file a version of this document in this proceeding, with redactions to information that is commercially sensitive within the meaning of the *Freedom of Information and Protection of Personal Privacy Act*.

d) *Stantec Inc. Environmental Assessment Plan*

- **proposal** for consulting services for proposed East-West Tie line in relation to pre-EA work, Terms of Reference, Environmental Assessment, general support (CEAA screening, OEB application, Biodiversity Initiative, orthophotography, other permits/approvals)
- contains: cost estimate and assumptions
- prepared: February 9, 2010

See response to 1(c) above.

e) *Senes Consultants Limited Socio-Economic Assessment Plan*

- **work plan** for activities for proposed East-West Tie line relating to: socio-economic, cultural and heritage sections of Terms of Reference and Environmental Assessment; socio-economic studies; conducting public information centres on socio-economic matters
- prepared: January 26, 2010

See response to 1(c) above.

f) *Inergi LP Map & Tiles*

- **map tiles** of existing East-West Tie line by sections
- **overview map** of existing East-West Tie line
- prepared: May 7, 2010

HONI is prepared to file this document in this proceeding.

2. HONI Presentations

a) *North and Central Transmission Projects*

- **presentation** on North-South transmission expansion, Algoma-Sudbury transmission expansion, East-West transmission tie, and Manitoulin Island enabler
- prepared: January 27, 2010

HONI is prepared to file this document in this proceeding.

b) *Transmission Expansion in NW Ontario*

- **presentation** on Northwest transmission expansion and East-West Tie expansion
- prepared: April 22, 2010

HONI is prepared to file this document in this proceeding.

3. Existing Facilities

- a) GPS Coordinates of existing East-West Tie line tower structures
 - **longitude and latitude** for each tower structure of existing line

HONI is prepared to file this document in this proceeding.

- b) Aerial “flyover” video of existing East-West Tie line
 - **video** of aerial view of existing line (Wawa TS x Lakehead TS)

HONI is prepared to file this document in this proceeding.

- c) Station graphics showing existing line entrances (Wawa TS, Marathon TS, Lakehead TS)
 - **photos** (top-down view) of transformer stations with line entrances superimposed

HONI is prepared to file this document in this proceeding.

4. Typical transmission line maintenance practices

- **HONI’s typical practices** for transmission line maintenance and vegetation/right-of-way management

HONI is prepared to file this document in this proceeding, and notes that it is essentially a summary of HONI’s maintenance practices, as identified in past rate applications.

5. Real Estate

- a) Categories of land rights and percentages along existing East-West Tie line
 - **land type percentages** (Crown, park, private, First Nation)

HONI is prepared to file this document in this proceeding.

- b) Licences and permits
 - **licences and permits** for provincial Crown lands and Pukaskwa National Park

HONI is prepared to file these documents in this proceeding, but notes that the documents in HONI’s possession may not be current. Up-to-date land use permits can be obtained by anyone directly from the Ministry of Natural Resources, and up-to-date park permits can be obtained by anyone from Parks Canada.

- c) Other real estate info
 - **easements** with private landowners

HONI respectfully recommends that these documents not be filed in this proceeding, as they involve contractual arrangements with individual landowners.

6. Historical outage data (weather events)

- **line outage statistics** (forced momentary, forced sustained, planned outages) from 2002 to 2011 along existing line

HONI is prepared to file this document in this proceeding, and notes that historical outage data can be obtained from the IESO.

7. Real Estate Agreements with First Nations

- **agreements** with First Nations for land rights along existing line

HONI respectfully recommends that these documents not be filed in this proceeding, as they involve contractual arrangements with specific First Nation groups.

Practice Direction on Confidential Filings

HONI is prepared to file documents in this proceeding, as discussed above, without any special filing arrangements, including those set out in the Board's *Practice Direction on Confidential Filings*.

We await the Board's further direction on the specific documents that the Board wishes HONI to file as part of this proceeding, and on the timing and process for such filing(s).