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BY E-MAIL

August 8, 2019

Jonathan Myers
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Dear Mr. Myers:

**Re: Wataynikaneyap Power GP Inc. and Wataynikaneyap Power LP
Application for Leave to Construct Transmission Facilities
Ontario Energy Board File Number EB-2018-0190**

The Ontario Energy Board (OEB) is in receipt of your letter dated July 22, 2019 (July letter), in which you advised, as counsel to Wataynikaneyap Power GP Inc. and Wataynikaneyap Power LP (together WPLP), of a change to WPLP's electricity transmission line project that was the subject of the above-noted proceeding. In its Decision in this proceeding¹, the OEB granted WPLP leave to construct certain transmission lines and related facilities (Project), as well as approving certain code exemptions and a cost recovery and rate framework.

Section 4.3.3.1 of Chapter 4 of the OEB's *Filing Requirements for Electricity Transmission Applications* requires that any material deviations to the approved route following OEB approval require further review by the OEB. In the course of detailed design and construction some minor deviations from the original route may be required, and the applicant is obligated to advise the OEB, which will decide if such changes are of sufficient significance to warrant further examination. Generally changes will be significant if new or existing landowners or public land are affected.

¹ EB-2018-0190, Decision and Order, issued April 1, 2019

The July letter informs the OEB of a change to the Project that WPLP says is immaterial regarding the location of the Wataynikaneyap Switching Station (including Dinorwic Junction)².

WPLP intends to shift the location of the Wataynikaneyap Switching Station approximately 620 meters to the northwest. Corresponding to this shift, the transmission line, at the southernmost point of the Line to Pickle Lake, will be extended by the same distance of approximately 620 meters. This additional segment will run parallel to HONI's Line D26A. Related changes are also being made to the planned locations for access roads and the temporary construction laydown area. The July letter submits that the changes are necessary to address constructability, soil condition and site access issues that arose during the refinement of design and construction plans in conjunction with WPLP's Owner's Engineer and Hydro One Networks Inc. (HONI). Attached to the July letter were maps, drawings and a revised written facility description reflecting the change.

The July letter explains that the change does not affect any new landowners or additional land parcels. WPLP has engaged with the only affected landowner, being the Province of Ontario through the Ministry of Natural Resources and Forestry (MNRF), and confirms that the MNRF has no concerns with the modifications.

The July letter explains that WPLP will implement the change subject to obtaining approval for the modifications under its environmental assessment (EA). WPLP does not anticipate difficulties obtaining the EA modification given that the revised location and the additional length of transmission line will be situated entirely within the two kilometer EA study corridor and run parallel to HONI's existing transmission ROW, and has been discussed with all affected parties including the MNRF.

In response to an inquiry from OEB staff, on August 2, 2019, WPLP filed a second letter (August letter) confirming that the change will cause a negligible impact on the construction schedule for the 230 kV line portion of the Line to Pickle Lake due to the need for approximately 620 additional meters of transmission line on an approximately 303 km line, and a positive impact on the construction schedule for the Wataynikaneyap Switching Station portion of the Line to Pickle Lake due to enhanced constructability,

² The facilities at which the Line to Pickle Lake portion of the project will interconnect with HONI's Line D26A

particularly the avoidance of grading issues and the presence of wetlands. WPLP estimates the increased cost associated with the additional 620 m of transmission line to be approximately \$0.5 million, but by changing the station location it will be able to reduce its construction costs by approximately \$0.5M to \$0.75M due to the avoidance of extensive site grading and aggregate. In addition, there are expected to be minor savings in the cost of access road construction as a result of the changes. On an overall basis, the modifications are expected to result in small cost savings for project construction on an approximately \$1.65B project.

As the Manager, Supply and Infrastructure Applications, I have been delegated the authority under section 6 of the *Ontario Energy Board Act, 1998* to determine whether any proposed changes to an OEB-approved electricity transmission project are material. I have been further granted the authority to approve any changes that I have concluded are not material.

Based on my review of the information provided in both the July letter and August letter, I have determined that the change proposed by WPLP is not material. I hereby approve the proposed change.

Yours truly,

Original Signed by

Nancy Marconi
Manager, Supply and Infrastructure Applications