



**BY E-MAIL**

August 23, 2019

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Dear Mr. Myers:

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

The Ontario Energy Board (OEB) is in receipt of your letter dated August 16, 2019 in which you advised, as counsel to Wataynikaneyap Power GP Inc. and Wataynikaneyap Power LP (together WPLP), of a proposed change to WPLP's electricity transmission line project that was the subject of the above-noted proceeding.

In its Decision in this proceeding<sup>1</sup>, the OEB granted WPLP leave to construct certain transmission lines and related facilities (the Project), and approved certain code exemptions and a cost recovery and rate framework. One of the conditions of approval was to advise the OEB of any material change in the Project.

The change identified in the August letter involves utilizing lattice steel transmission line structures for the 230 kV and 115 kV line segments rather than the H-frame wood pole structures contemplated in WPLP's leave to construct application. WPLP states that, in its view, the change is not material and therefore does not require further review or approval from the OEB. WPLP's letter seeks confirmation, by no later than September 4, 2019, that the OEB considers the change to be immaterial.

In the letter, WPLP explained that while the advantages of using lattice steel structures were known to the project team, it was assumed based on empirical evaluations of comparable projects and advice from independent engineering consulting firms that

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<sup>1</sup> EB-2018-0190, Decision and Order, issued April 1, 2019

lattice steel would not be economically feasible. As such, project development and preliminary design contemplated the use of H-frame wood structures for the 230 kV and 115 kV segments.

Through the competitive Engineering, Procurement and Construction contracting process, however, WPLP stated that it became evident that the use of steel structures would not cost substantially more than wood. While WPLP could complete the contracting process on the basis of the H-frame wood pole design, it has the option of completing the process on the basis of primarily using lattice steel structures for the 230 kV and 115 kV components of the Project.

WPLP stated that the lattice steel structures would be based on the same transmission line routing and therefore would not affect any new landowners or public lands, and does not constitute a deviation to the approved route. WPLP also stated that the change would not impact the electrical performance or the expected completion date for the project, and that the change in structure has advantages related to cost savings, reliability, land, and the environment.

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.

Based on my review of the information provided in the letter regarding the implications of the proposed change in structure, I have determined that, in this circumstance, the proposed change is not a material change in the Project as approved by the OEB. As such, no further review or amendment to the leave to construct approval is required at this time.

The letter stated that WPLP is in the process of notifying the Independent Electricity System Operator (IESO) and Ministry of the Environment, Conservation and Parks (MECP) of the potential change in structure. Consistent with the conditions of approval, the OEB expects to be promptly informed should material changes to the Project result from notification of MECP, the IESO, or any other party.

Yours truly,

*Original Signed by*

Nancy Marconi  
Manager, Supply and Infrastructure Applications