



EB-2009-0079

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c.15 (Schedule B);

AND IN THE MATTER OF an application by Hydro One
Networks Inc. for an Order granting leave to construct new
transmission line facilities in the County of Oxford including
the City of Woodstock and Norwich Township.

BEFORE: Gordon Kaiser
Vice Chair & Presiding Member

Paul Vlahos
Member

Ken Quesnelle
Member

DECISION AND ORDER

1. Application

Hydro One Networks Inc. (“Hydro One” or the “applicant”) filed an application on May 31, 2009 with the Ontario Energy Board (the “Board”) pursuant to Section 92 of the *Ontario Energy Board Act, 1998* for an order granting leave to construct transmission line facilities in the County of Oxford and specifically in the City of Woodstock and in Norwich Township. The proposed transmission line facilities involved rebuilding approximately 4 km of a single-circuit 115 kV transmission line on an existing right-of-way (“ROW”) with a double circuit 230 kV line. Hydro One also proposed to construct a new transformer station (“Commerce Way TS”) at the request of the local LDCs, to which the rebuilt line will connect. Hydro One asserts

that this transformer station is not subject to section 92 approval, but that information about this station was included to provide additional context to the application.

The Board assigned File No. EB-2009-0079 to the application.

There were no intervenors in the proceeding.

The Board proceeded by way of a written hearing as this was requested by the applicant and there were no requests for an oral hearing.

2. Background and Project Overview

Hydro One's evidence is that the proposed work to be carried out and the line facilities to be constructed, owned, and operated by Hydro One are as follows:

- approximately 4 km of 230 kV double circuit line would be constructed to replace the existing B8W single circuit 115kV line on the existing ROW between Woodstock TS and the proposed Commerce Way TS;
- this rebuilt line would be connected to a new double circuit line, K7/K12, at Woodstock TS (approved under EB-2007-0027 and scheduled to be in-service in December 2011) ;
- approximately 0.1.km of double circuit line would be constructed from the B8W ROW to the location of the new Commerce Way TS; and
- approximately 4 km of the existing 115 kV single circuit line B8W from Woodstock TS to Commerce Way TS would be removed.

Hydro One indicates that the new line would initially operate at 115 kV. Hydro One also states that the new transformer station, Commerce Way TS, is being built at the request of the local LDCs (Hydro One Distribution and Woodstock Hydro) and it is proposed that this station be constructed, owned, and operated by Hydro One.

The Woodstock East line upgrade project and the installation of the new Commerce Way TS would be the third of three projects to upgrade capacity and reliability in the Woodstock Area. Previously the Board has approved:

- the new Toyota Transformer Station connection [a line connection from the former B8W transmission line to Woodstock Toyota TS under EB-2006-0352]
- the Woodstock Area Transmission Reinforcement [a general area reinforcement including the rebuilding of a 230 kV line from Ingersoll TS, various transmission rearrangements and the new Karn TS under EB-2007-0027]

3. Evidence and Submissions on Need and Alternatives

3.1. Project Type and Classification

Hydro One states that area load forecasts indicate that the demand on the B8W line will be 145 MW when Commerce Way TS and Toyota Woodstock TS are fully loaded and therefore the line as it currently exists cannot accommodate the projected load requirements without some type of uprating initiative as its present rating is only 105 MW. In addition, Hydro One states that the existing single circuit B8W line is nearing its end of life and the line towers can not accommodate the replacement of the existing conductors with larger or higher-rated conductors or accommodate an additional circuit placement due to the lack of tower structural strength. Hydro One further contends that new connection facilities (Commerce Way TS and the associated rebuilt transmission connection) are required immediately to relieve the current overloading situation at Woodstock TS and to meet the increased load at that location. Since rebuilding the existing line is being carried out to meet future load requirements and to replace an ageing facility, Hydro One submits that this aspect of the need is non-discretionary. For the development aspect (the upgrade to a double circuit 230 kV line), Hydro One states that this need is discretionary as this work could be done at a later date. Hydro One proposes to do the work now, however, in order to take advantage of construction synergies with the current project.

In response to Board staff IR 2, Hydro One stated that according to its latest forecasts, line loading on B8W would not exceed 105 MW until 2025 and the loading was not projected to reach 145 MW until 2040. Hydro One also stated in its response to Board staff IR 3 that the B8W transmission line had been installed in 1910, refurbished in 1994 and also had the transmission tower load reduced in 1994 by the removal of one of the two circuits from the line.

Hydro One submits that while a single circuit 115 kV line with larger conductors could supply the customers' expected future load, it is proposing that a double-circuit 230 kV configuration be constructed in order to meet future reliability guidelines and address anticipated future system enhancements in the area. Compared to the costs of rebuilding the line in a like for like manner, Hydro One asserts there is only a minor additional cost to upgrade this facility to double circuit 230 kV standards and it makes economic sense to do the work now while other construction work is being carried out.

Therefore, although Hydro One states there is a discretionary reliability component to this project, Hydro One asserts that the project is primarily driven by the non-discretionary needs of meeting additional customer load requirements and dealing with the potential end of life of an existing asset.

3.2. Relevant Hydro One/IESO Transmission Operating Guidelines

The pre-filed evidence indicates that Hydro One's preferred solution when rebuilding the line is to provide a double circuit supply to Commerce Way TS. Hydro One states that adding a second circuit is based on the IESO's four hour Load Restoration Criteria (contained in IESO's Ontario Resource Transmission Assessment Criteria), which specifies that loads greater than 150 MW should be restorable within an approximate four hour time limit following a contingency. Typically, this means the line should be restorable through switching to a readily accessible second circuit. Given that Hydro One states that B8W is projected (over the planning cycle) to be close to the 150 MW threshold of the Load Restoration Criteria, Hydro One contends that it is appropriate to install a second circuit at this time when construction at this location is already taking place.

As previously noted, Hydro One's response to Board staff IR 2 confirmed that according to its latest forecasts, B8W line loading was not projected to reach 145 MW until 2040.

In its reply submission, Hydro One references the IESO's eight hour Load Restoration Criteria for loads less than 150 MW and indicates that a double circuit is also required for load delivery of this amount as without it the eight hour restoration time would be violated. Hydro One submits this would be the case as there are no other high voltage transmission lines in the area to provide an alternate supply for a

B8W outage and in addition, Hydro One submits that the Woodstock area distribution system lacks back-up capability to assist with restoration efforts in the event of a local high voltage line failure.

3.3. Transformer Station

Woodstock Hydro and Hydro One Distribution are requesting that Hydro One Networks build a new transformer station to meet their forecast demand. The proposed station ("Commerce Way TS") would be located near the anticipated load center and within close proximity of the existing 115 kV line (B8W) corridor. In order to supply this station, Hydro One asserts that an upgrade to the transmission line capacity is required.

Hydro One states in its pre- filed evidence that the proposed transformer station (Commerce Way TS) is not subject to section 92 approval. Board staff, however in its submission indicates that the Act states that transformer stations are included in the definition of an electricity transmission line and that the Act further states that no person shall construct, expand or reinforce a transmission line without first obtaining from the Board an order granting leave.

3.4. Capacity Requirements for the Proposed Facilities

The pre-filed evidence indicates that the existing Woodstock TS is over-loaded and the summer peak demand has exceeded its summer capacity of 82.9 MW for the past few years. Woodstock Hydro and Hydro One Distribution, in a combined load forecast, projected load growth over the summer capacity rating at Woodstock TS of 40 MW by 2012 and 60 MW by 2016. Hydro One asserts that the forecast load growth can not be met through distributed generation in the Woodstock Area or through conservation and demand management initiatives and so a supply type initiative is required.

As previously noted, Hydro One also asserts that existing transmission line B8W will require upgrading over the forecasted planning period and the estimated power delivery requirement will approach 150 MW over this period.

3.5. Alternatives Considered and the Preferred Alternative

Hydro One states that the “Do Nothing” alternative was discarded as the loads at the existing facilities have exceeded the capacity of these facilities and the transmitter has an obligation under the Transmission System Code to provide new capacity when requested to do so by customers. Hydro One further states that the alternative of supplying new loads from the Brant TS/Burlington TS end (to the east of the Woodstock load center) of the existing B8W 115 kV transmission line was also discarded because of insufficient capacity in this section of the line. Hydro One also indicated that the cost of upgrading that section of line would be seven or eight times higher than the applied for upgrade as an upgrade to the Brant TS/Burlington TS end is much longer than the applied for upgrade section (30 km vs. 4 km).

Accordingly, Hydro One states the preferred alternative is to upgrade the existing 4 km section of line B8W and install additional transformation capacity close to the load center anticipated by Woodstock Hydro and Hydro One Distribution.

4. Evidence and Submissions on Impacts

4.1 Project Economics and Cost Justification

A) General

Hydro One stated in the pre-filled evidence that the estimated cost for the construction and installation of the proposed 4 km double circuit, 230 kV overhead transmission line in question is \$14.89 M.

Although the cost of this facility is projected to be greater than some recent Hydro One transmission projects (e.g. Hurontario Project; EB-2006-0013) in the GTA, Hydro One stated in its response to Board staff IR 4 that there are valid reasons for this cost differential. Hydro One indicated these cost differences have to do with different transmission line span lengths, different tower and foundation designs and different construction traffic management requirements for the two locations.

The proposed reinforcement facilities in Woodstock comprise both line and transformation assets. Hydro One proposes to include the new 230 kV double circuit transmission line from Woodstock TS to Commerce Way TS in the Line Connection

Pool for rate making purposes. Hydro One states that the line assets include provisions that would require pool funding since the design of the new line is over-and-above the customer requested facilities to meet system reliability and future load growth needs as well as the requirement to rebuild an existing end-of-life circuit. The costs associated with the transformation assets that are not offset by the capital contributions of Woodstock Hydro and Hydro One distribution will be included in the transformation pool.

Hydro One states that a Discounted Cash Flow (DCF) calculation has been completed for each pool consistent with the economic evaluation requirements of the Transmission System Code to determine whether a capital contribution is required. For the Line Connection Pool, no capital contribution is required for the main portion of the transmission line, but a contribution is required for the tap portion from the main ROW to the proposed transformer station. For the Transformation Connection Pool, Hydro One states that the TS estimated cost is \$29.9 M and it is proposed that the pool fund \$17.3 M of this cost. This would result in, capital contributions totalling \$12.6 million being required from the local LDCs.

B) Cost Responsibility

Line Connection Pool and Network Pool

In determining the capital contribution regarding the line connection assets, Hydro One states that it has assigned costs to customers for cost responsibility purposes of \$0.7 million. This amount covers the cost of constructing a line tap from the B8W ROW to the new station location. Hydro One indicates that the remaining \$14.2 million of line connection costs covers the cost of rebuilding the existing end-of-life line to 230 kV standards and installing a second 230 kV circuit from Woodstock TS to the tap location for Commerce Way TS. Additionally, \$6.4 million in telecommunications work is included in the project (which is primarily network pool-related), Hydro One has indicated that \$5.8 million has been identified to upgrade telecommunication for the transmission system reliability needs (i.e., the 230 kV upgrade).

Hydro One indicates that the costs related to the replacement of the existing line and upgrade to 230 kV standards have been assigned to the pool for cost responsibility

purposes and excluded from the project economic analysis, in accordance with the exceptions provided in Sections 6.3.6¹ and 6.7.2² of the Transmission System Code.

4.2 System Impact Assessment and Customer Impact Assessment Approvals

System Impact Assessment

Under the Market Rules any party planning to construct a new or modified connection to the IESO-controlled grid must request an IESO System Impact Assessment (“SIA”) of these facilities. The IESO assessment addresses the impact of the proposed facilities on system operating voltage, system operating flexibility, and on the ability of other connections to deliver or withdraw power supply from the IESO-controlled grid. The IESO has completed an SIA for this project (Final Draft Report; IESO_REP 0491) and this document was filed with the pre-filed evidence. The SIA report states that the proposed transmission facilities will improve the voltage profile and increase supply capability in the Woodstock Area, and will not adversely impact the reliability of the IESO-controlled grid. The SIA also called for Hydro One and the local LDCs to work collaboratively on a reactive load compensation initiative, for Hydro One to provide certain information on its equipment and for Hydro One to confirm it can carry out certain control actions if required.

Customer Impact Assessment

A Customer Impact Analysis (“CIA”) is also required and Hydro One filed a CIA as part of its response to Board staff IR 12. Hydro One’s CIA confirmed that the proposed Commerce West TS can be incorporated on to the IESO administered grid without any negative impacts on the IESO grid or on the transmission customers connected to the IESO system in Woodstock and the surrounding area.

In response to Board staff IR 12, Hydro One has committed to carrying out all of the recommendations made in both the SIA and CIA reports.

Transmission System Code; clause 6.3.6: A transmitter shall develop and maintain plans to meet load growth and maintain the reliability and integrity of its transmission system. The transmitter shall not require a customer to make a capital contribution for a connection facility that was otherwise planned by the transmitter, except for advancement costs.

Transmission System Code; clause 6.7.2: Where a transmitter’s connection facility is retired, the transmitter shall not recover a capital contribution from a customer to replace that connection facility.

4.3 Community and Agency Consultations

Hydro One stated that it has sought and received input on the proposed project from a broad range of government agencies. Hydro One indicated that the initial step in its consultation process involved a presentation to the City of Woodstock Council on February 7, 2008. Because part of the study area falls within the Township of Norwich, Hydro One advised that in early 2008 it also met with Norwich's Mayor and Chief Administrative Officer and with the Chief Administrative Officer from the County of Oxford. Hydro One also identified and provided project information to several interest groups in the region.

Hydro One used various methods to notify the local community and stakeholders about the project and held two Public Information Centres (PICs) as part of the Class EA process. Hydro One stated that it used local area newspaper ads to advise individuals of the upcoming public information centres. In addition to these ads, Hydro One stated that notification for both PICs consisted of approximately 400 personally-addressed notices to property owners within the study area for the new transformer station, and to property owners within 120 m of the transmission line that would be upgraded. In addition, approximately 4,200 copies of the newspaper advertisement were delivered via Canada Post unaddressed AdMail to all owners/occupants of residential, farm and commercial premises within 500 m of the existing transmission line Hydro One proposes to upgrade.

4.4 Land and Property Matters

The Commerce Way project's proposed transmission facilities will include a new double circuit 230 kV overhead transmission line located within the existing 115 kV transmission line corridor. Hydro One advises that the existing corridor running from the Woodstock TS easterly to the proposed Commerce Way TS site, a distance of approximately 4 kilometers, is a combination of:

- provincially owned property segments held under title to the Ministry of Public Infrastructure and Renewal, and managed by the Ontario Realty Corporation;
- municipal properties managed by the City of Woodstock, Parks and Recreation, and the Economic & Development Committee;

- easement rights on private properties; and
- municipal road corridors.

Hydro One states that the existing transmission line corridor crosses approximately 45 privately owned properties and one municipal park property managed by City of Woodstock Parks & Recreation. The corridor also crosses a total of 12 city streets that provide access to residential neighborhoods, numerous commercial and industrial sites and the City of Woodstock Commerce Way Business Park. Hydro One states that the proposed transmission line facilities will be partially accommodated by land rights Hydro One has presently secured along the existing corridor. These rights consist of an Occupation Agreement with the City of Woodstock Parks and Recreation Department, easement rights Hydro One possesses on all of the provincially-owned corridor lands, as well as its existing permanent easements rights on private property. Hydro One asserts that additional permanent easement rights will be required to widen a limited number of sections along the existing 66 feet wide corridor to allow for additional clearances where new larger angle towers will replace the existing angle towers.

Hydro One plans to use its existing land rights along the corridor from the existing Woodstock TS to the proposed Commerce Way TS. In all cases where new land rights are required, Hydro One states it will attempt to secure the rights through negotiated agreements with affected landowners. Where a negotiated agreement is not possible within a reasonable time frame, Hydro One indicates it will seek approval to expropriate the required land rights in accordance with the requirements of Section 99 of the *OEB Act*, immediately after a Board approval is received. Hydro One has also submitted in its pre-filed evidence the form of easement agreement it proposes to utilize.

4.5 Environmental Issues

The proposed Commerce Way transmission reinforcement facilities fall within the definition of the projects covered by the *Class Environmental Assessment for Minor Transmission Facilities* ("Class EA"), which is approved by the Ontario Ministry of Environment ("MOE") under the Ontario Environmental Assessment ("EA") Act. The Class EA process for this project includes preparing a Draft Environmental Study Report and Hydro One has prepared such a report.

As noted within, a PIC was held in Woodstock on February 21, 2008, where the public had the opportunity to learn about the project and meet the project team. A second PIC was held on February 5, 2009, to present the details of the proposed undertaking, including details of the new transmission line and the location of Commerce Way TS.

Hydro One stated in the pre-filed evidence that in accordance with the Class EA process, it made its draft Environmental Study Report available for a 30-day public review and comment period from March 12 to April 13, 2009. Hydro One stated that at the conclusion of the public review and comment period, no comments from members of the public were received, nor were there any requests to elevate the Class EA to an Individual EA. Hydro One indicated that three comments were received from government agencies and these were incorporated into the final Environmental Study Report.

4.6 First Nations and Aboriginal Matters

Hydro One stated that it consulted with the Ontario Ministry of Aboriginal Affairs, and Indian and Northern Affairs Canada, and has provided information on this project to the following First Nations:

- Chippewas of the Thames First Nation;
- Oneida Nation of the Thames;
- Munsee-Delaware Nation;
- Mississaugas of the New Credit First Nation;
- Chippewas of Kettle and Stoney Point;
- Walpole Island First Nation; and
- Six Nations of the Grand River.

Hydro One provided extensive documentation through Board staff IR 11 regarding how it determined the Aboriginal Peoples' who had an interest in or were affected by the proceeding, its correspondence history with all groups or communities along with copies of correspondence sent to these groups/communities. Hydro One also stated in Board staff IR 11 that no group that was contacted expressed any objection to the project in question. Hydro One further asserted that it was committed to the engagement of all these groups/communities throughout the entire extent of this project.

5. BOARD FINDINGS

Section 96(2) of the OEB Act provides that for an application under section 92 of the Act, the Board shall only consider the interests of consumers with respect to prices and reliability and quality of electricity service when determining if a proposed project is in the public interest.

In the context of this application the Board considers an approval of the transmission assets to carry with it the implication of necessitating the associated transformation assets. Without the transformation assets the transmission assets could not serve the purpose which forms the basis upon which the leave to construct application is predicated. The evidence supporting the need for the transmission facilities has the concomitant function of supporting the transformation station that renders the transmission facility useful. For these reasons, specific to this application, the Board considers its approval to be inclusive of both the transmission and transformation assets as a common project.

The main issues for the Board in consideration of the application are as follows:

- Is the project needed and is it the best alternative?
- What impact will the project have on transmission rates?
- What impact will the project have on reliability and quality of supply?
- Have the land-use matters been addressed?
- If the project is approved, what are the conditions of approval?

5.1 Is the project needed and is it the best alternative?

The Board accepts the updated forecast of the loading for transmission line B8W and the overall forecasts for the Woodstock area facilities. The Board also acknowledges the Hydro One assertion that all available CDM and DR have been incorporated into the forecasts.

The Board accepts that transmission line B8W requires replacement due to ageing. Although the line may be within its thermal rating for some time, the Board acknowledges the applicant's reasoning to further enhance the line rating at this time when associated work is being performed. The Board also finds that it is reasonable for Hydro One to upgrade circuit B8W, a single circuit 115 kV transmission line to a

double circuit 230 kV facility at this time. The incremental cost to upgrade now compares favourably against the cost to do so at a later date when viewed in the context of the probability of the upgrade being required within the expected life span of the facilities.

5.2 What impact will the project have on transmission rates?

Hydro One states that it has carried out an analysis of the transmission rate impact on the basis of Hydro One's transmission revenue requirement for the year 2008, and the most recently approved Ontario Transmission Rate Schedules. Hydro One states that the network pool revenue requirement would be unaffected by the new reinforcement facilities, based on the criteria used to allocate transmission costs to the three pools as approved by the Board in its EB-2006-0501 decision.

Based on the Line Connection Pool incremental cash flows associated with the cost of the line facilities, Hydro One contends that there will be only a minor change in the Line Connection pool revenue requirement once the project's impacts are reflected in the transmission rate base at the projected in-service date in December of 2011. Hydro One states that when the impact caused by the proposed project is reflected into the calculations for the relevant transmission pools, the impact on a typical residential customer's bill is projected to be about 0.01 % and the Board accepts this evidence.

5.3 What impact will the project have on reliability of supply?

The Board accepts the conclusion in the SIA and CIA reports that the project will not have any negative affects on the IESO grid or on adjacent transmission customers, will improve the voltage profile in the area and also improve the area supply reliability and redundancy.

5.4 Have the land-use matters been addressed?

The Board notes that a significant part of the project will be located on public land and that agreements are being negotiated with the municipalities for the construction of these facilities. Where private land is involved, the Applicant has secured or is in the process of securing the necessary land rights and has filed in evidence a form of easement agreement that is acceptable to the Board.

5.5 What are the conditions of approval?

The Board approves the project, as described in the Application of Hydro One subject to the conditions of approval appended to this Decision and Order, which are in keeping with the Board's practice for establishing certain general conditions for projects of this type.

Conclusion

Based on these findings the Board has determined that the construction of the proposed facilities is in the public interest and that an Order granting leave to construct should be made.

IT IS ORDERED THAT:

1. Hydro One Networks Inc. is granted leave, pursuant to section 92, to construct approximately 4.0 kilometres double-circuit 230 kV transmission facilities on an existing right-of-way in Oxford County and the associated transformation and connecting assets described in its application as Commerce Way TS subject to the Conditions of Approval attached as Appendix A to this Order.
2. Hydro One Networks Inc. shall pay the Board's costs incidental to this proceeding upon receipt of the Board's invoice.

DATED at Toronto, November 6, 2009

ONTARIO ENERGY BOARD

Original Signed By

Kirsten Walli
Board Secretary

Appendix “A”

To Decision and Order

EB-2009-0079

November 6, 2009

CONDITIONS OF APPROVAL

**Hydro One Networks Inc. – Woodstock East Transmission Line
Reinforcement Project**

1 General Requirements

- 1.1 Hydro One Networks Inc (“Hydro One”). shall construct the facilities and restore the land in accordance with its application and evidence, except as modified by this Order and these Conditions of Approval.
- 1.2 Unless otherwise ordered by the Board, authorization for Leave to Construct shall terminate December 31, 2011, unless construction has commenced prior to then.
- 1.3 Except as modified by this Order, Hydro One shall implement all the recommendations of the Environmental Study Report filed in the pre filed evidence, and all the recommendations identified in the System Impact and the Customer Impact Assessments which were prepared for this project.
- 1.4 Hydro One shall advise the Board's designated representative of any proposed material change in the project, including but not limited to changes in: the proposed route; construction techniques; construction schedule; restoration procedures; or any other impacts of construction. Hydro One shall not make such change without prior approval of the Board or its designated representative. In the event of an emergency, the Board shall be informed immediately after the fact.
- 1.5 Hydro One shall obtain all necessary approvals, permits, licences, certificates and easement rights required to construct, operate and maintain the proposed project and shall provide copies of all such written approvals, permits, licences and certificates upon the Board's request.

2 Project and Communications Requirements

- 2.1 The Board's designated representative for the purpose of these Conditions of Approval shall be the Manager, Electricity Facilities and Infrastructure Applications.
- 2.2 Hydro One shall designate a person as project engineer and shall provide the name of the individual to the Board's designated representative. The project engineer will be responsible for the fulfilment of the Conditions of Approval on the construction site. Hydro One shall provide a copy of the Order and Conditions of Approval to the project engineer, within ten (10) days of the Board's Order being issued.
- 2.3 Hydro One shall give the Board's designated representative ten (10) days written notice, in advance of the commencement of the construction.

- 2.4 Hydro One shall furnish the Board's designated representative with all reasonable assistance for ascertaining whether the work is being or has been performed in accordance with the Board's Order.
- 2.5 Hydro One shall develop, as soon as possible and prior to the start of construction, a detailed construction plan. The detailed construction plan shall cover all activities and associated outages and also include proposed outage management plans. These plans should be discussed with affected transmission customers before being finalized. Upon completion of the detailed plans, Hydro One shall provide five (5) copies to the Board's designated representative.
- 2.6 Hydro One shall furnish the Board's designated representative with five (5) copies of written confirmation of the completion of construction. This written confirmation shall be provided within one (1) month of the completion of construction.

3 Monitoring and Reporting Requirements

- 3.1 Both during and after construction, Hydro One shall monitor the impacts of construction, and shall file four (4) copies of both an interim and a final monitoring report with the Board. The interim monitoring report shall be filed within six months of the in-service date, and the final monitoring report shall be filed within eighteen months of the in-service date. Hydro One shall attach to the final monitoring report a log of all complaints related to construction that have been received. The log shall record the times of all complaints received, the substance of each complaint, the actions taken in response, and the reasons underlying such actions.
- 3.2 The monitoring report shall confirm Hydro One's adherence to Condition 1.1 and shall include a description of the impacts noted during construction and the actions taken or to be taken to prevent or mitigate the long-term effects of the impacts of construction. This report shall describe any outstanding concerns identified during construction and the condition of any rehabilitated land and the effectiveness of any mitigation measures undertaken. The results of the monitoring programs and analysis shall be included and recommendations made as appropriate. Any deficiency in compliance with any of the Conditions of Approval shall be explained.
- 3.3 Within fifteen (15) months of the in-service date, Hydro One shall file with the Board a written Post Construction Financial Report. The Report shall indicate the actual capital costs of the project and shall explain all significant variances from the estimates filed with the Board.

4 Other Approvals

- 4.1 Hydro One shall obtain all other approvals, permits, licences, and certificates required to construct, operate and maintain the proposed project, shall provide a list thereof, and shall provide copies of all such written approvals, permits, licences, and certificates upon the Board's request.