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ONTARIO ENERGY BOARD

May 3, 2007

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 27th Floor  
2300 Young Street  
Toronto, ON, M4P 1E4

Dear Kirsten Walli:

Regarding: Request for observer status on EB-2007-0050 - Bruce-Milton Transmission Reinforcement Project

We are the owners of Lot 48 Con 2 SDR Part 2, West Grey Twp which is one of the properties that will be directly impacted by the proposed construction of the additional 500 kV electrical transmission line between the Bruce Power Facility and Hydro One's Milton Switching Station.

As directly affected property owners we were served notice of Hydro One's application in a letter from Mr. Glen MacDonald, Regulatory Affairs – Hydro One Networks Inc. dated April 17<sup>th</sup> delivered by Canada Post on Friday April 27<sup>th</sup>.

We are requesting observer status in regards to the Bruce-Milton Transmission Reinforcement Project, File No. EB-2007-0050.

The following are our comments on the application to construct the proposed transmission line:

1. We are concerned that the process is proceeding too fast and insufficient time will be available for a full and proper review of the project and alternatives. We raise this concern for the following reasons:
  - The initial submission of the project to the OEB indicates “the project cannot await the outcome of IPSP proceeding if it is to meet the earliest possible in-service date of December, 2011”. This suggests that a crisis is imminent and that there is a lack of long term planning in the Ontario electrical power generating and transmission system. These time restrictions seem to prevent the examination of alternative routes or technological options.
  - The first notice we received as an affected property owner was dated March 29<sup>th</sup> and informed us that there would be a “Public Information Centre” (IPC) in Hanover on May 1<sup>st</sup>; representatives would be on hand to provide more project details and to answer questions. Prior to this May 1<sup>st</sup> meeting we received a letter from Mr. MacDonald dated April 17<sup>th</sup>. This letter informs us that we must act in a very limited timeframe or we forfeit our rights to participate in this process. The timelines do not provide affected property owners, or other interested parties, sufficient time to obtain and analyze information in order to participate in the process.

- The comment sheet available at the Hanover PIC asks for specific comments on the Terms of Reference for the EA study. However, only a draft table of contents of the Terms of Reference for the EA study was available! It is difficult to provide comment on something that does not exist.
2. We are concerned that this project does not adequately consider alternatives nor address Ontario's overall power generation and transmission requirements.

At the Hanover PIC, information was available on how the construction of the proposed transmission line would enable transmission of additional power to the Milton Switching Station. However, there was little or no information available on why the other alternatives were not selected. In particular the following questions were not adequately answered at the May 1<sup>st</sup> IPC in Hanover.

- What transmission lines originally transmitted power from the Bruce Generating Station and why are these transmission lines no longer adequate?
  - There are commitments to close down the coal fired generating stations in Lambton and Nanticoke. What power transmission potential within the Ontario power grid will become available when these plants close and how could it be used to provide an alternative to building an additional line?
  - Where will additional generating capacity be added to replace the coal fired generating stations? What impact would this additional capacity have on the requirements for the existing and proposed transmission lines?
  - What are the cost benefits to replacing the existing 230 kV transmission line with a 500 kV or higher capacity transmission line, compared to the proposed construction of the additional 500 kV line? The option of maximizing the transmission potential without widening the corridor appears to have been discarded from consideration.
  - What are the power transmission capacities of all existing power transmission lines that could be utilized to transmit power between the Bruce Generating Stations and the Milton Switching Station? How are these existing transmission lines currently utilized? How much capacity can be added to existing transmission lines and at what cost?
3. Was the location of the new line arbitrarily set to the north of the existing line or was an analysis performed that suggests that there are benefits to the northern placement compared to a southern placement? If the location was not arbitrarily selected, what were the decision criteria and the results of the analysis?
4. A Hydro One representative indicated that there is excess capacity on the Bruce to Longwood transmission line. Why is this transmission line capacity not being utilized? Is this capacity being reserved for transmission of power to the United States rather than being utilized for the needs of Ontario?
5. Has the risk of concentrating three major power lines in close proximity been appraised? What consideration has been given to a catastrophic failure of the transmission system due to natural disasters or terrorist attacks? Measures which may mitigate the risk of terrorist attacks or natural disasters to a centralized

facility, such as a generating station or switching station, may not be capable of mitigating similar risks to a 180 km transmission line.

6. Is there a comprehensive plan for forecasting the long term power requirements, location of generating stations, and development of a secure and reliable transmission network for Ontario's electrical system? Should expenditures of \$500 million to \$1 billion for a new transmission line be considered outside of a process which considers the long term requirements and capabilities of the entire system?

We hope to receive answers to our questions and that our concerns will be taken into consideration in the approval process for the proposed transmission line or alternatives.

Sincerely,

Handwritten signatures of Rob and Cathy Cooper in cursive script.

Rob and Cathy Cooper

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