Ontario Energy Board

Commission de l'Énergie de l'Ontario

EB-2009-0425

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 the Toronto Midtown Transmission Reinforcement Project.

BEFORE: Paul Sommerville
Presiding Member

Ken Quesnelle
Member

DECISION AND ORDER

1. Application

Hydro One Networks Inc. ("Hydro One" or the "Applicant") filed an application on December 23, 2009 with the Ontario Energy Board (the "Board") pursuant to section 92(1) of the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Schedule B, (the "Act") for an order granting leave to construct transmission facilities in the City of Toronto.

The Applicant is seeking leave to construct transmission facilities for the Toronto Midtown Transmission Reinforcement Project ("Midtown Project"). The work involves constructing and/or renewing 5.3 km of overhead and underground transmission line facilities in the City of Toronto and associated facilities.

The Board assigned File No. EB-2009-0425 to the Application.

The Board issued a Notice of Application and Written Hearing on January 28, 2010 and the Applicant served and published the Notice as directed by the Board. In response to the Notice, five parties requested and were granted intervenor status in the proceeding: the Independent Electricity Service Organization ("IESO"), the Toronto District School Board ("TDSB"), the North Rosedale ratepayers Association ("NRRA), and Toronto Hydro-Electric System Limited ("THESL"). Two parties, the Ontario Power Authority and the Moore Park Residents Association requested observer status, and there were numerous letters of comment and information from interested parties.

2. Procedural Matters

Procedural Order No. 1 was issued on February 22, 2010 inviting and specifying dates for interrogatories on the application, and for responses to be submitted by the Applicant. The Board also asked that parties who intended to submit evidence should advise the Board of that intent.

Procedural Order No. 2 was issued on March 10, 2010 following a request from the NRRA for an extension of time to submit interrogatories, and a response from Hydro One which indicated that it did not object. This procedural order granted an additional time period for interrogatories and extended the date for advising of an intention to submit evidence, and granted Energy Probe intervenor status and cost eligibility. The Board reminded the parties that they should be mindful of the scope of the Board's mandate when contributing to the record that the Board will rely on in making its determination. The Toronto District School Board and the North Rosedale Ratepayers Association indicated their intention to provide evidence.

On April 16, 2010, the Board issued Procedural Order No. 3, which established dates for submission of intervenor evidence, interrogatories on that evidence, and responses for interrogatories on evidence, and for final submissions.

On April 21, 2010 the NRRA provided notice of a motion seeking direction from the Board regarding the adequacy of information provided by Hydro One in its March 24, 2010 responses to interrogatories. Hydro One agreed to provide the information requested in the motion and did so on April 30, 2010.

On April 26, 2010 the NRRA and the TDSB submitted evidence. The TDSB additionally submitted interrogatories on Hydro One's evidence, and Board staff submitted interrogatories on the NRRA evidence.

On May 3, 2010 the TDSB wrote the Board indicating that it was not satisfied with Hydro One's responses to its interrogatories. Also on May 3, 2010 the NRRA advised that it could not meet the timelines for filing responses to interrogatories or for filing final submissions as set out in Procedural Order No. 3. In Procedural Order No. 4 the Board issued a finding that the TDSB evidence and interrogatories were not within the scope of the proceeding. The Board also granted additional time for the NRRA to respond to interrogatories and to submit its final submission, and for the Applicant to submit its reply submission.

3. Project Overview

Hydro One's application describes the project as comprising the following main components:

- The project involves the installation of a three circuit 115 KV overhead line of approximately 1.7 Km running between Leaside Transformer Station ("TS") and Bayview Junction. Two circuits will replace the existing L14W and L15W overhead line along existing right of ways, while the third will be used as a new supply circuit for Bridgeman TS. To accommodate this additional circuit, the current double circuit towers will be replaced with taller ones.

- Hydro One will also install two underground cable circuits in a rock tunnel between Bayview Junction and Birch Junction. The tunnel will stretch 2.2 Km, primarily along existing rights-of-way, at a depth of 60 to 70 meters. One cable circuit will replace the existing L14W cable, which has reached the end of its service life, and the second cable will be used as a new circuit to address the need for increased supply to Bridgeman TS.

- Hydro One will rebuild the overhead line section of the L14W circuit between Birch Junction and Bridgeman TS, running about 1.4 Km. Currently this section carries an idle circuit that is to be reconductored and uprated.

- A new 115 kV circuit breaker will be installed at Leaside TS. There will be some necessary reconfiguration at Bridgeman TS, and protection, control and telecommunication facilities will be revised to accommodate the changes.

The work would begin in August 2010, for a planned in-service date of April 2013. The facilities will be constructed, owned and operated by Hydro One, with a deep rock tunnel to be constructed by contract. The total cost of the project is estimated at $105 million, jointly financed by the Applicant (60%) and Toronto Hydro Electric System Limited (40%).

4. Board Findings

The Board's jurisdiction in this case arises from section 92 (1) of the Ontario Energy Board Act which states:

> 92 (1) No person shall construct, expand or reinforce an electricity transmission line or an electricity distribution line or make an interconnection without first obtaining from the board an order granting leave to construct, expand or reinforce such line or interconnection.

In discharging its duties in this case the Board must take into account the provisions of Section 96 of the Act which states:

> 96 (1) If, after considering an application under section 90, 91 or 92 the board is of the opinion that the construction expansion or reinforcement of the proposed work is in the public interest, it shall make an order granting leave to carry out the work.
>
> (2) In an application under section 92, the Board shall only consider the following when, under subsection 1, it considers whether the construction, expansion or reinforcement of the electricity transmission line or electricity distribution line or the making of the interconnection, is in the public interest:
>
> 1. The interests of consumers with respect to prices and the reliability and quality of electricity service.

2. Where applicable and in a manner consistent with the policies of the government of Ontario the promotion of the use of renewable energy resources.

The role of renewable energy resources is not an issue in this case. However, the limitation on the Board's jurisdiction appearing in Subsection 2 (1) above is highly relevant to its consideration of the merits of the case and the public interest. The Board attempted at every opportunity to ensure that the parties to the case had a clear understanding that its sole considerations in considering the public interest consists of the consideration of the project impact with regard to prices, reliability and quality of electricity service.

The primary concerns of some of the intervenors involve matters that fall outside of the Board's jurisdiction in considering this application. Particularly, some parties had an interest in the environmental impacts associated with the construction of the project and the project itself once completed. Given the terms of Section 96 (2) 1, those issues cannot be considered by this Board in its determination of the public interest. Those issues may find a home in the environmental assessment process or some other process associated with the project, but all of this falls outside of the Board's jurisdiction.

In considering the public interest, within the limitations of section 96, the Board typically reviews a number of subject matters in determining whether the proposal made by the applicant is consistent with the public interest.

While the Board considers alternatives to the project, those alternatives are assessed in the context of the specific factors listed in Section 96(2) of the OEB Act. These factors do not include the impact on individual landowners, except to the extent that the impact could materially affect the prices, reliability and quality of electricity service to consumers generally. The environmental and socio-economic impacts of alternative routes are considered in the Environmental Assessment ("EA") process required under the *Environmental Assessment Act*. Individual land rights are considered in the context of a proceeding under the expropriations process.

4.1 The Need for the Project

The Applicant states that the project is needed for the following reasons:

First, to replace an aging underground cable section of the 115 kV L14 W circuit between Bayview Junction and Birch Junction. The application indicates that the cable referred to is an oil filled cable which was installed some 55 years ago, and is one of the oldest cables in Hydro One's transmission fleet. It was damaged by a contractor in 2002 and was tested at that time. This testing revealed that there was significant deterioration of the cable jacket and that the cable had aged significantly. Testing also found that the overburden was providing poor heat dissipation, increasing the possibility that the cable could overheat and fail particularly under heavy load. This would make the entire area load vulnerable during outage conditions if another circuit fault occurred. Hydro One has concluded that this cable is at the end of its useful life.

Second, the application is intended to address overloading of the transmission facilities under single contingency conditions and to provide for future load growth. The condition of the L14 W cable raises the prospect that with a single outage of one line and a single contingency on another, the area could be subject to blackout. As the load in the area increases, this scenario becomes more likely.

Third, the application is designed to enable the electrical supply for the midtown area to maintain the existing level of reliability. In response to Board staff interrogatory No. 13, the Applicant identifies an end of life condition associated with the overhead section of the line between Leaside and Bayview junction, in addition to the end-of-life condition of the cable referred to above.

Fourth, the application is designed to meet long-term load growth. Hydro One suggests that the increasing load would result in early tripping of the remaining supply in the standard outage and contingency scenario. This last rationale attracted considerable attention through the interrogatory process. It is well-known that very recent economic conditions have resulted in an erosion of load generally. The load forecasts associated with this application suggest that there was no load growth from 2009 to 2010 and that thereafter a 1% per annum growth is assumed. The 1% load growth is described as an historical rate which has proven to be reliable over many years.

Hydro One also notes, in response to Board staff interrogatory No. 2, that in the past five years there have been twelve occasions when there has been a forced outage during a period when a companion circuit was out of service. These conditions

occurred outside of peak load period. If they had occurred during peak load period there would have been a black-out condition for the area and/or a requirement to reduce the load to prevent blackout. The Board is satisfied that Table 1 at Exhibit B, Tab 1, Schedule 4, page 5 demonstrates that under existing peak load conditions there would be an excess flow over the existing facility. This condition will only deteriorate with the reasonably anticipated increases in total load over time.

The Applicant also did some analysis respecting the effect of conservation and demand management activities. It is clear from that analysis, which was not challenged in the course of this proceeding by any party, that the projected amount of reduced load brought about by conservation and demand management programs will not be sufficient to mitigate the risks to reliability of service identified by the company if the project were not to proceed.

Accordingly, for the reasons outlined here, the Board concludes that the company has demonstrated that the reinforcement proposed by the Applicant is in the public interest.

4.2 System Impact Assessment and Customer Impact Assessment

System Impact Assessments are conducted by the IESO to determine the implications for the system of the proposed reinforcement. This is a technical document intended to provide a detailed review of the components of the proposal and its impacts on system operating voltage, system operating flexibility and the implications for other connections to deliver and withdraw power from the system. A final System Impact Assessment dated August 12, 2009, and a System Impact Assessment Addendum dated January 25, 2010 were filed by the Applicant in this proceeding. These assessments document the IESO conditional approval of the project, and its finding that the new configuration of the facilities once the project is completed will not prejudice efficient operation of the system.

A Customer Impact Assessment, conducted by the Applicant was also filed. It is designed to assess the implications of the project for other transmission customers of the transmission system. A final Customer Impact Assessment dated March 10, 2010 was filed as part of the Applicant's evidence in this case. That assessment confirmed that the project is not expected to have any negative implications for other customers of the transmission system.

4.3 Environmental Study Report

This project falls within the definition of projects that are governed by the Class Environmental Assessment for Minor Transmission Facilities ("Class EA"). This process, which is provided for under the *Environmental Assessment Act*, will ultimately result in an approval by the Ontario Ministry of the Environment. It requires the Applicant to provide data respecting the environmental and social economic features within the affected area, the identification of any environmental effects of the facilities and any corresponding mitigation measures, information respecting the route selection and evaluation, and to conduct outreach to the community. The Applicant has engaged in extensive consultation with the affected communities through public information centres as well as meetings designed to address concerns of affected persons. This process extended beyond the close of the evidentiary portion of this proceeding, and is expected to conclude shortly. As noted above, the environmental implications of the application drew considerable interest from the intervenors. For example, the Toronto District School Board raised the question of electromagnetic fields and their effects. This is a subject matter that falls outside the scope of the Board's jurisdiction, but may well be relevant to the environmental assessment process.

4.4 Land matters

The vast majority of the project runs along existing easements and allowances. The Applicant has indicated that there may be a requirement for short-term easements or agreements for access associated with construction activities. This will entail entering into agreements with affected persons. In the event that required access cannot be secured by way of agreement there are provisions in the Act which can be resorted to, to ensure completion of the project.

4.5 Alternatives considered by the Applicant

The "do-nothing" option was rejected by the applicant as not meeting the reasonable requirements of its system and its customers. As found above, the Board agrees that the need for the project has been demonstrated.

Given that, there were different options available to the Applicant in solving the reliability problem presented by the current facility.

The Applicant considered whether to trench, tunnel or use overhead wires for the various segments of the project. After its analysis, Hydro One concluded that tunneling was the preferable option over trenching for one section. This assessment was made in order to limit street level excavation and minimize: vehicular and pedestrian disruption, inconvenience to businesses, interference with other underground infrastructure and the public, as well as health and safety risks associated with open trenching. This preference for the tunneling option was made easier given the very small cost differential associated with tunneling as compared to trenching.

However, with respect to the section running between Leaside TS and Bayview Junction, the company opted for overhead lines as opposed to either tunneling or trenching. For this section of the reinforcement, the use of the overhead option, which would replace a double circuit with a three circuit line was preferred because it presented significantly lower cost, easier constructability and offered the lowest impact on the community and the environment. This choice is also consistent with Hydro One's general policy to build all high-voltage transmission lines above ground wherever possible. It places transmission lines underground only if there are technical constraints that prevent the construction of an overhead line or if for any particular area the cost of constructing an overhead line is not practical. For the Leaside TS to Bayview Junction portion of the project, the Board is persuaded by the Applicant's evidence that the overhead option is the most appropriate.

Table 1[1]: Evaluation of Option for Section 1: Leaside TS x Bayview Jct

Evaluation Criteria	**S1-1: Overhead Line**	S1-2: Underground Cable on Rail Corridor		S1-3: Underground Cable on Rail Corridor	
		Trench	Tunnel	Trench	Tunnel
Estimated Cost	**Lowest**	Higher	Higher	Higher	Higher
Constructability	**Relatively Easier**	Moderate	Moderate	Difficult	Moderate
Effect on Traffic/ Business	**Low**	High (rail track)	Low	High	Low
Interference with Other Infrastructure	**Low**	High	Low	High	Low
Environment	**Low**	High	Low	High	Low

For the section between Bayview Junction and Birch Junction the Applicant

[1] Application Exhibit B,Tab 3, Schedule 1, Page 3

considered two approaches. The Applicant's preferred option is to tunnel under the CPR track. The Applicant identifies as its primary advantage that it avoids the acquisition of any land from homeowners and eliminates rail line caused outages.

Table 2[2]: Evaluation of Option for Section 2: Bayview Jct x Birch Jct.

Evaluation Criteria	S2-1: Underground Cable on Rail Corridor		S2-2: Underground Cable on Road Allowance	
	Trench	**Tunnel**	Trench	Tunnel
Estimated Cost	Lower	**Lower**	Lower	Higher
Constructability	Moderate	**Moderate**	Difficult	Moderate
Effect on Traffic/ Business	High (rail track)	**Low**	High	Low
Interference with Other Infrastructure	High	**Low**	High	Low
Environment	High	**Low**	High	Low

Note: The trenching options costs are escalated due to extremely high construction costs associated with coordination of work with CP Rail traffic because of safety clearances

In its submissions the NRRA encouraged the Board to require the Applicant to adopt what it described as the hybrid route for the project. This approach, which was devised by the NRRA and presented for the first time during argument, was thought to minimize cost and interference or inconvenience in the neighborhood. While not taking issue with the Applicant's demonstration of need for the project, or the cost of the project, Energy Probe suggested that the Board should consider the NRRA's hybrid route, and should require the Applicant to consider its implementation.

In its reply the Applicant argued that there was no demonstrated cost saving associated with the hybrid route, nor was there any reliable basis upon which to conclude that inconvenience would be minimized by its adoption.

The Board agrees. A project of this magnitude, which will cost in excess of $100 million, involves a very complex and comprehensive overview of a range of factors. Not only must the technical requirements of the project be met, but it must be accomplished efficiently, safely, and with a view to minimizing the disruption and inconvenience to all affected persons. The Board is satisfied that Hydro One's proposal meets these criteria, and that there is simply not enough information or

[2] Application Exhibit B,Tab 3, Schedule 1, Page 4

underlying analysis to support the hybrid route proposed at a late stage of the proceeding by the NRRA.

However, the Applicant does have a certain degree of discretion to alter the manner in which it undertakes the project. The Board's approval of the project will be subject to a number of conditions, one of which would require the Applicant to advise the Board if material changes to the project plan are contemplated. If the Applicant after further consideration finds that it wants to alter the project in a material way it will be obliged to advise the Board and the intervenors accordingly. The Board does not consider the change in location of the construction shaft as discussed in the latest public information meeting to be a material change to the Applicant's proposal.

4.6 Cost of the proposal

The project has a total cost of approximately $105 million, comprised of $50.2 million attributable to the design and build of the 2.2 km, 3 m wide diameter tunnel and shafts and for the supply and installation of cable. The balance is for the replacement of the two circuit towers between Leaside and Birch Junction with three circuit towers, the refurbishment of some of the overhead line, the addition of a circuit breaker and attendant protection and control changes.

Hydro One provided tables which set out summaries of the costs and the comparative costs for the project and the alternatives.

	Current Proposal[3] $M
Real Estate Costs	9.9
Contingency	16.4
Construction Costs	59.6
Interest	8.9
Overhead Charges	10.1
Total Project Costs	104.9

[3] Derived from Exhibit C, Tab 1, Schedule 5, Page 3, response to Board staff interrogatory No. 5h

Figure 1: Summary of the Project Costs[4]

	Option 1 (b) (O/h plus tunnel)		
	THESL	Hydro One	Total Cost
Leaside TS-Bayview Jct	19.6	4.9	24.5
Bayview-Birch Jct	16.5	57.0	73.5
Birch Jct- Bridgman TS	7.2	0	7.2
O&M cost	9.5		
Total	52.8	61.9	105.2

4.7 Effect on ratepayers

The evidence discloses that the effect on a typical customer is small. At the Exhibit B-4-3, page 7 the Applicant estimates that a ratepayer with a typical monthly bill of $137.53 will see an increase of $0.07 per month or 0.05% of the total bill.

The Board concludes that the Applicant's approach to the cost of the project has been responsible and that it will not have an undue or unreasonable effect on prices related to the transmission of electricity.

4.8 Land matters

Hydro One has indicated that all of the affected landowners have been contacted and that all existing and proposed land acquisition requirements, including transmission line easements, permits and access or construction easements, have been discussed with landowners. The Applicant does not see any major land issues associated with this project.

The Applicant has received two requests to move existing towers to different locations. Pending the outcome of these assessments, new easements or permits may be required. One of these situations involves discussion with the Loblaw's company respecting its request for a relocation of one tower. Negotiations with regard to this aspect continue. The other is that NRRA also advanced a request that a particular tower be relocated. Hydro One has provided a detailed response to that

[4] Derived from Reference Exhibit C1-17, attachment 1, page 3 (response to Board staff Interrogatory No. 11)

suggestion and the Board is satisfied that it would not be economically sound or reasonable to require the company to accede to this request of the NRRA. A letter of comment suggested that the opportunity existed for Hydro One to bury the section from Leaside to Bayview Junction.

The Applicant has engaged in extensive public consultation with stakeholders in the community and has undertaken to minimize nuisance effects on the local community. The Applicant has also indicated that it would establish a community liaison committee during the construction period.

4.9 Conclusion

For the reasons described above and subject to the conditions appearing in Appendix A to this decision, the Board approves the proposal and grants Hydro One leave to construct the facilities described therein. In the Board's view, in consideration of the effect of the project on prices, and the safety, quality and reliability of the transmission of electricity in the province, the project is in the public interest.

5. Cost Awards

The only intervenor requesting costs eligibility in this matter is Energy Probe. The Board notes that Energy Probe was not a very active participant in the proceeding and expects that its cost claims will reflect the level of its activity. Claims for cost awards shall be filed with the Board and forwarded to Hydro One within 21 calendar days from the date of this Decision and Order.

Any objections by Hydro One to the claimed costs shall be filed with the Board and submitted to the claimant within 28 calendar days from the date of this Decision and Order.

If Hydro One objects to Energy Probe's claimed costs, Energy Probe may file with the Board and forward to Hydro One any responses to any objections for cost claims within 35 calendar days of the date of this Decision and Order.

Hydro One shall pay the Board's costs of, and incidental to, this proceeding immediately upon receipt of the Board's invoice.

IT IS ORDERED THAT:

1. Hydro One Networks Inc. is granted leave, pursuant to section 92 of the Act, to construct and/or renew, in the City of Toronto, approximately 5.3 km of overhead and underground transmission line facilities, and the associated transformation and connecting assets described in its application, 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 immediately upon receipt of the Board's invoice.

DATED at Toronto on June 17, 2010

ONTARIO ENERGY BOARD

Original signed by

Kirsten Walli
Board Secretary

Appendix "A"
To Decision and Order
EB-2009-0425
June 17, 2010

CONDITIONS OF APPROVAL

Hydro One Networks Inc. – Toronto Midtown Transmission 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

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.

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