ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an application by Detour Gold Corporation under Section 92 of the *Act* for an Order granting leave to construct a new 142 km 230 kV single circuit overhead transmission line, to be operated initially at 115 kV, on the existing right-of-way to re-connect the Detour Lake Mine to the IESO-controlled grid at Island Falls.

SUBMISSIONS OF THE INDEPENDENT ELECTRICITY SYSTEM OPERATOR

- 1. The Independent Electricity System Operator (the "IESO") appreciates the opportunity to make submissions to the Ontario Energy Board (the "Board") for consideration regarding Detour Gold Corporation's ("Detour") application for leave to construct transmission facilities to connect the Detour Lake Mine to the IESO-controlled grid.
- 2. The IESO carried out a System Impact Assessment (SIA) review and examination of the reliability effects and connection requirements in respect of Detour's proposal to connect the Detour Lake Mine at 115 kV to the IESO-controlled grid on an interim basis at Island Falls SS. Detour referred to this proposal as Phase 1. The IESO was advised that the 115 kV connection will be removed from service and the Detour Lake Mine grid connection transferred to a new 230 kV transmission line that it plans to construct and energize in the spring of 2012. Detour referred to the latter as Phase 2.
- 3. The SIA review relied in part on information and technical data regarding the 115 kV transmission connection provided by Detour and the external consultant retained by Detour to undertake related work. Based on the project information and data that was provided, the IESO concluded that the connection at 115 kV will not

adversely affect the reliability of the IESO-controlled grid. IESO conditional connection approval was therefore granted on this basis.

- 4. While the IESO is not particularly concerned about the reliability effects of connecting the Detour Lake Mine to the IESO-controlled grid at 115 kV, we have one observation of note regarding the leave to construct approval being sought and the supporting evidence that has been presented in this regard. The IESO believes that the evidence that has been presented regarding potential reliability impacts does not entirely support the relief being sought by Detour. In particular, we note that in this proceeding Detour is seeking leave of the Board to construct a new 142 km 230 kV single circuit transmission line that will be connected at Island Falls (to be operated in the interim at 115 kV); however, the supporting evidence (i.e., SIA, CIA, etc.) that has been presented in respect of the reliability impacts on the IESO-controlled grid and other transmission customers in the vicinity of the proposed connection is based on a 115 kV connection proposal.
- 5. The Board is required to consider, among other things, the reliability effects of a proposal to construct, expand, or reinforce a transmission line or make a transmission interconnection. Specifically, section 92(1) of the Act requires that:
 - (1) No person shall <u>construct</u>, <u>expand</u> or <u>reinforce</u> 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. 1998, c. 15, Sched. B, s. 92 (1).

Further, Section 96 of the Act requires that:

- **(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 <u>reliability</u> and quality of electricity service.

¹ Notice of Application and Hearing, EB-2010-0142, August 16, 2010

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6. In the normal course, the applicant is expected to provide sufficient evidence

regarding any potential reliability impacts on the IESO-controlled grid and other

transmission customers in the surrounding area of the proposed connection, as well as

any related connection requirements that are prescribed in relations to its leave to

construct proposal. The SIA for Phase 1 does not address the proposed 230 kV

transmission line.

7. Detour has indicated that it plans to also file an application with the Board for

leave to construct Phase 2 which will enable the Detour Lake Mine to connect to the

IESO-controlled grid at 230 kV in order to increase its supply capability from 20 to 120

MW.² It will be necessary for the IESO to examine the reliability impacts of the entire

230 kV connection proposal (i.e., the reliability impact review will not be limited to just

the additional 230 kV line from Island Falls SS to Pinard TS.). The IESO is currently

undertaking a separate review to examine the potential reliability impacts and

connection requirements pertaining to Detour's 230 kV transmission line proposal.

All of which is respectfully submitted,

Original signed by

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Submitted this 10th day of November, 2010

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² Submissions of Detour Gold Corporation, EB-2010-0242, Nov 5, 2010, Page 1 of 7, para. 3