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BY COURIER , RESS & EMAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th Floor, Box 2329
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Haldimand County Hydro Inc. ("HCHI")
Confirmation of Request for Intervenor Status
Board Proceeding No: EB-2011-0063**

We are counsel to HCHI in this proceeding. We are responding to a letter dated June 7, 2011 from the Board.

HCHI confirms its desire to continue to participate in this proceeding as an intervenor. In HCHI's request for intervenor status dated April 21, 2011, reproduced below for your convenience, it identified a number of potential issues related to the leave to construct application of Grand Renewable Wind LP.

"Haldimand County Hydro is not opposed to the wind project but has serious concerns relating to the proposal to locate transmission lines on a pole line along the municipal road in the Haldimand County right-of-way. Areas of the Leave to Construct Application of interest to Haldimand County Hydro are as follows:

- a) **Overhead Transmission Lines.** *Haldimand County Hydro is opposed to overhead transmission lines located along roadways, except approximately perpendicular roadway crossings, in Haldimand County. If the Board decides that the Applicant has the right to build a 230kV transmission line within the municipal road right-of-way, then Haldimand County Hydro would request that the Board order the transmission line to be built underground.*
- b) **Co-existence incompatibility and congestion.** *Haldimand County Hydro's distribution lines are either already present along the roadways contemplated by the Applicant for the proposed tie line or will be needed in the future. The need for distribution lines to serve Haldimand County Hydro's current and future load*

customers, or distribution connected distributed generators, is dynamic as opposed to transmission lines where the future need is static. As such, this proposal could impact Haldimand County Hydro's ability and cost to connect future customers.

- c) **Practices in other Provinces.** Haldimand County Hydro has no experience co-existing with transmission lines along municipal rights-of-way. From preliminary research on similar issues in other jurisdictions, it appears that transmission lines are not allowed along roadways at all in some jurisdictions.¹
- d) **Staff Safety.** Haldimand County Hydro is concerned for the safety of its employees working on its lines adjacent to, or on, the same poles as a high voltage transmission line. Such work may occur during all types of circuit and weather conditions, day and night, and Haldimand County Hydro's safety concerns include the risk of induction from the transmission lines. Further, the need to be able to complete such work may require significant expenditures by Haldimand County Hydro for additional equipment and training.
- e) **Public Safety.** Energized overhead transmission lines may fall onto nearby distribution lines due to vehicle accidents or other causes. This creates a risk of extremely high voltage being transmitted to residential or other customers during the brief time before the circuits are automatically interrupted. Overhead transmission lines located on private property away from roadways and underground transmission lines are not subject to the same risk of vehicular accidents or similar incidents.
- f) **Roadway Width.** Although overhead transmission lines may be appropriate along a major transportation corridor like Highway 401, sized with such a purpose in mind, they are no more appropriate along rural roads than they would be along residential subdivision roads in an urban setting. Once again, preliminary research on similar issues in other jurisdictions suggests that the transmission right-of-way itself should "... be 19.8m for a 238kV Line ..." and "These right-of-way distances would be measured from the edge of travel lanes."²
- g) **Reliability of Distribution Supply.** Any damages to a transmission pole, which also supports a distribution circuit, necessitating its replacement, will extend the duration of distribution customer service interruption until the transmitter can respond. Further, Haldimand County Hydro expects that work on de-energized

¹ For example, see a September 30, 2005 report entitled "Effects of High Voltage Transmission Line In Proximity of Highway" which was prepared for the Ministry of Transportation in British Columbia. This report includes a survey of "Utility Policies from other Provinces and States" and suggests transmission lines are not allowed along roadways at all in some jurisdictions, including Quebec.
http://www.th.gov.bc.ca/publications/eng_publications/electrical/transmission_line_study.pdf.

² Ibid.

distribution lines will necessitate the installation of additional temporary grounds due to the significant induction from a parallel transmission line, thereby extending work time."

HCHI submit that the items listed fall directly within the Board's statutory considerations in a leave to construct application under section 92 of the *Ontario Energy Board Act, 1998*.

One of the key concerns of HCHI is to ensure the proposed facility does not have an adverse impact on HCHI's current or planned distribution system or its ratepayers in respect of the prices, reliability and quality of electricity service. When a high voltage transmission line is located in close proximity to a distribution system there are potential impacts relating to stray voltage, induction, service quality indicators and safe working conditions as well as creating potential impediments to distribution line extensions and upgrades.

If there are any questions please feel free to contact the undersigned at your earliest convenience.

Yours truly,

AIRD & BERLIS LLP



Scott A. Stoll

SAS/hm

cc: L. Payne
All Participants

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