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June 22, 2011

BY COURIER, EMAIL AND RESS

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

Dear Ms. Walli:

**Re: Submission of Haldimand County Hydro Inc.
Board File No. : EB-2011-0027**

Please find attached two (2) hard copies of the Submissions of Haldimand County Hydro Inc. ("HCHI") for proceeding EB-2011-0027.

An electronic version of the Submissions has been filed through the Board's Regulatory Electronic Submission System today.

If there are any questions, please contact the undersigned at your convenience.

Yours truly,

AIRD & BERLIS LLP



Scott A. Stoll
SAS/ hm
Encl.

cc: Applicant
All Intervenors
L. Payne
K. Sebalj, OEB
N. Mikhail, OB

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O.1998, c.15, Schedule B, as amended (the “**OEB Act**”)

AND IN THE MATTER OF an application by Summerhaven Wind LP (the “Applicant”) for an order under section 92 and subsection 96(2) of the OEB Act granting leave to construct an electricity transmission line and related facilities.

SUBMISSIONS OF HALDIMAND COUNTY HYDRO INC.

PART I. INTRODUCTION

- 1) Haldimand County Hydro Inc. (“**HCHI**”) is the licensed electricity distributor in Haldimand County where Summerhaven Wind LP (the “**Applicant**” or “**Summerhaven**”) proposes to construct the transmission line (the “**Project**”) that is the subject of this Application and the related wind farm and distribution facilities. HCHI intervened in this proceeding to ensure that the proposed Project did not adversely impact HCHI, its distribution system or customers in respect of the cost, reliability or quality of service. As noted during the course of the Proceeding, HCHI does not object to the wind farm or the construction of a transmission line to service the wind farm but is seeking to have the Board impose certain conditions.
- 2) If the Board determines that leave to construct should be granted to the Applicant, HCHI would request that such an Order(s) include the following conditions:
 - a) The Applicant must design and build its transmission line pole locations, pole heights, and clearances relative to an HCHI distribution line consisting of two 27.6 kV 3 phase circuits as described in drawing 01-316 of the Kinectrics Report, including the neutral height of 25 feet above the crown of the road; including HCHI poles located midspan between two transmission poles where the transmission conductor sag is greatest and its swing arc also the greatest under the most severe weather and loading conditions.
 - b) All road crossings shall be designed and built to provide adequate clearance for HCHI’s future needs, based upon two 27.6 kV 3 phase circuits as described in drawing 01-316

of the Kinectrics Report, including the neutral height of 25 feet above the crown of the road, to cross under the transmission line safely.

- c) That the centreline of the proposed 230kV transmission line along Concession 5 be located on private property at least 10 metres from the property line paralleling the municipal right-of-way and that the design ensure the maximum swing arc or blowout for the transmission line conductor remains within the Applicant's easement.
 - d) That the installation of guy wires not be anchored within a municipal road right-of-way.
 - e) Where any span guys cross over the roadways that appropriate clearances under the span guys be provided for HCHI to construct two 27.6 kV 3 phase circuits as described in drawing 01-31 of the Kinectrics Report 6, including the neutral height of 25 feet above the crown of the road.
- 3) HCHI is concerned that the evidence before the Board would indicate that a common switching station for the Applicant and the Port Dover and Nanticoke Wind Project is the better alternative as compared to the facilities included in the present Application and would better fulfill the requirements of the OEB Act. HCHI would request the Board address the expectations and requirements of the Board regarding the adherence to the "strong recommendation" from the Independent Electricity System Operator (the "IESO").

PART II. BACKGROUND AND PROCEEDING

- 4) In the Application the location of the Project location was described as follows:

"It is possible that certain sections of the Transmission Line will be constructed within County road right-of-way, and the remaining sections will be built on easements acquired from private landowners" (Exhibit B, Tab 4, Schedule 1, Page 1, para. 15.)

- 5) A map showing the approximate location of the transmission line was included at Exhibit B, Tab 3, Schedule 2. However, HCHI was not able to determine from the information provided the extent of construction proposed to occur in the road allowance and whether the Applicant intended to enter into Joint Use Pole arrangements in respect of the Project.
- 6) The Concession 4 and Concession 5 municipal right-of-way is 66 feet wide.
- 7) HCHI is not a transmitter. HCHI was concerned about induction, stray voltage, the need to rebuild facilities, the potential for increased operating and maintenance costs and impacts on service quality indicators. HCHI retained Kinectrics, a specialist in the area, to understand the Project and its potential impact on the HCHI distribution system.
- 8) The Application did not provide further specification regarding the location of the Project. As such, HCHI posed several questions to the Applicant during the interrogatory phase of the Project in order to understand what the Applicant was in fact proposing to construct. Without this information, HCHI could not assess the impact on HCHI's distribution system. Even after the responses to the interrogatories were provided, HCHI was unable to assess the impact of the Project as the design information was not available.

- 9) Following the interrogatory phase of the Proceeding, the Board convened a Technical Conference to permit further evidence to be provided regarding the Project. Board Staff repeated a number of the interrogatories at the opening of the Technical Conference in order to better understand the Project.
- 10) A map of the HCHI distribution system located in close proximity to the Project was filed during the Technical Conference, TCJ1.4. The map was updated as part of the response to interrogatories, Board Staff IR#3, and is appended to these submissions for ease of reference.
- 11) During the Technical Conference, the Applicant clarified that:
- a) The requested route would cross the Concession 4 right-of-way and would not travel parallel to, and within the right-of-way, as shown on Exhibit B, Tab 3, Schedule 2. Provided the Applicant meets the required clearance HCHI is agreeable with and supports this change. This change has not been shown on the map provided by HCHI. The revised crossing was reflected in Summerhaven's response to Undertaking TCK1.1, Exhibit A.
 - b) The requested route would parallel the Concession 5 for approximately 2,000 metres but would be located south of the municipal right-of-way. HCHI will have to extend its distribution system along the Concession 5 to provide service to the proposed transformer station that forms part of the Project. During the Technical Conference, Summerhaven informed HCHI that the transformer station only requires single phase service.
 - c) A preliminary proposed cross-section of the right-of-ways (municipal and adjacent private transmission easement) and the transmission pole configuration was provided by the Applicant. This had been requested by HCHI during the interrogatory phase (HCHI # 2) so that HCHI could have a preliminary analysis performed on the potential for induced voltage and other impacts.
 - d) The selection of the pole had changed from approximately 23 to 25 metres (Exhibit, Tab, Schedule) to a design of 29 metres above ground. The design was selected assuming a HCHI distribution pole of 12.1 metres above ground.
 - e) It was requesting, and had obtained, a 30 metre easement from private landowners.
 - f) The 34.6kV collector system would be located underground and no joint use pole agreements would be required between HCHI and the Applicant for the collector lines.
 - g) It was in the process of finalizing agreements with the affected landowners and that its intent was to negotiate easement agreements. In the event that Summerhaven could not negotiate the necessary easements, Summerhaven indicated that it may at that time apply to the Board for the right to expropriate the easement.
- 12) Of note, the Applicant confirmed that it had not performed any studies regarding the potential for the proposed facilities to cause an induction, stray voltage or other problem for the HCHI distribution system and the fully expected post operation mitigation to be performed on HCHI's distribution system. An excerpt from the Tr. Vol. I, page 53:

1 MR. STOLL: Okay. So for a 230 kV line, like, even
2 under the proposal, you haven't done an analysis for the
3 potential for induction into the distribution facilities?
4 [Witness panel confers]

5 MR. GIVENS: Can you repeat your question?

6 MR. STOLL: Okay. So have you done any analysis
7 regarding the potential for induction to impact the
8 Haldimand County Hydro distribution facilities?

9 MR. GIVENS: No, we have not. Our experience is that
10 if there are induction issues, that they can be easily
11 mitigated, and as long as the lines are designed to comply
12 with the existing code requirements, the...

13 MR. STOLL: Is it mitigation on the transmission
14 design or on the distribution or both?

15 MR. GIVENS: On the distribution.

- 13) Summerhaven later acknowledged that the costs of such mitigation would be borne by the Applicant. However, as there is no connection to HCHI's distribution system and no request for joint pole use there is no requirement for a contractual relationship between HCHI and the Applicant. In the absence of a contract, HCHI would have no contractual right to recover from the Applicant.
- 14) Summerhaven confirmed that as of the date of the Technical Conference the Ministry of the Environment ("**MOE**") had not accepted the Renewable Energy Approval Application as it was awaiting a response from the Ministry of Natural Resources. As such the six month period for the MOE to make decision on the Renewable Energy Approval has not commenced (Tr. Vol. I, page 34, ll. 21-28 and page 35 ll. 1-4).
- 15) As noted above, HCHI retained a consultant, Kinectrics, to assist it in this proceeding. Given the design information that first became available at the Technical Conference, HCHI requested Kinectrics to perform an analysis of the potential issues related to the proposed Project. Kinectrics prepared evidence (the "**Kinectrics Report**") which was filed in this proceeding and subjected to written cross-examination from the other participant.
- 16) In the report, Kinectrics recommended the following:
- a) "Due to its proximity, the transmission line will provide lightning protection against direct lightning strikes. It is recommended to maintain a minimum distance of 10 m or more between the transmission and distribution system poles to limit the GPR (Ground Potential Rise) transfer during lightning strikes to the transmission line and 60Hz faults." (page 5)
 - b) A more comprehensive study when detailed design is complete.

- 17) The existing distribution system in the vicinity of the Project is 4.8kV. HCHI has been in the process upgrading its distribution system and converting it to 27.6kV. HCHI informed the Applicant of its plans to upgrade the distribution system to 27.6kV in the area of the Project (HCHI Response to Summerhaven IR#1). In order to accommodate such an upgrade, HCHI will have to install a new taller pole, in accordance with drawing 01-316 in Appendix B to the Kinectrics Report. The actual height of each pole will depend upon the local terrain.
- 18) HCHI indicated in its response to Summerhaven IR#4(e)(1) that in a situation regarding animal contact that it had involved a claim for more than \$2million. While that was an issue of animal contact voltage, it is illustrative of the potential for costly consequences that can result and forms a basis for the concerns expressed by HCHI and the desire to ensure the design phase eliminates the potential for any similar issues to arise.

PART II. THE STATUTORY TEST

- 19) The *Ontario Energy Board Act, 1998*¹ (the "OEB Act") prohibits a person from constructing a transmission line without an order from the Board granting leave to construct. The Applicant is proposing to construct approximately 9.5 km of 230kV transmission line and a related transformer station and switching station and therefore requires the Board to grant leave.

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.

- 20) In determining whether or not to grant leave, section 96(1) of the OEB Act requires the Board to determine whether the Project is in the public interest. Section 96.(2)2 limits the consideration of "public interest" to "*interests of consumers with respect to prices and the reliability and quality of electricity service*".

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 sources.

¹ S.O.1998, c.15, Schedule B, as amended.

- 21) HCHI is a licensed, rate-regulated electricity distributor in Haldimand County. Where the Project may impact HCHI's costs of distributing electricity or the reliability or quality of service that HCHI is able to provide to its consumers, the Board should consider such impact in its deliberations.
- 22) The OEB Act does not restrict the Board's consideration of impact to consumers of the connecting utility, in this case Hydro One Networks Inc. Further, the OEB Act, does not restrict the consideration to the immediate impact. As such, HCHI submits the Board should consider the impact the Project will have on the consumer of HCHI in regards to price, reliability and quality of service based upon the existing conditions and planned or reasonably foreseeable circumstances.

PART IV. Submission on the Proposed Design of the Project

- 23) HCHI has not, and is not, in principal opposed the Project or the related wind farm. However, if the Board determines that leave to construct is within the public interest, HCHI submits that the Board should include certain restrictions in furtherance of the public interest mandate. The request for the Board to impose conditions in the Order is to ensure the potential for any impact on HCHI is reduced or eliminated during the finalization of the design of the Project.
- 24) HCHI supports the revised direct crossing of Concession 4 that was announced by Summerhaven at the Technical Conference. The original proposed route indicated a length of transmission line of less than 100 metres running parallel to the Concession 4. The now straight crossing was confirmed by Summerhaven during the Technical Conference (Tr. Vol.1, page 35 and 36, lines 21-28 and 1). This is also confirmed in TCK1.1, Exhibit A.
- 25) It is HCHI's position that the Board should expect the Applicant to design the Project to avoid impacting HCHI customers based upon the existing and proposed distribution system. As noted in the Kinectrics Report, there is a potential for an impact on the equipment of HCHI and its customers. If the Board does not grant the request of HCHI, there is the potential for the issue to present itself and adversely impact the equipment of the HCHI customer.
- 26) HCHI submits that its position is consistent with Board fulfilling its mandate under sections 92 and 96 of the OEB Act and also the statutorily imposed guiding principles of section 1 of the OEB Act.
- 27) To the extent that the yet to be completed design can reasonably accommodate such conditions, HCHI submits that it is reasonable for the Board to make that a requirement of the granting of leave to construct.

a) Clearances – Road Crossings

- 28) The Project will cross the existing HCHI distribution system at 3 locations, (i) Sandusk Road; (ii) Concession 4; and (iii) Cheapside Road.
- 29) There are minimum separation distances that must be maintained as part of the design of the Project.

- 30) HCHI asks that the Board to require Summerhaven to design and build all 230 kV road crossings to provide adequate clearance for HCHI's future needs, based upon two 27.6 kV 3 phase circuits as described in drawing 01-316 of the Kinectrics Report, including the neutral height of 25 feet above the crown of the road, to cross under the transmission line safely.
- 31) HCHI understands that the transmission line crossing of Concession 4 Road will be diagonal and not approximately perpendicular requests the crossing clearances be consistent for all roads and regardless which side of the road HCHI's lines are built or how close the distribution poles are to the crossing.
- 32) The intent of this express requirement is to ensure the Project meets the current technical requirements and will not cause additional costs for future HCHI upgrades which would be passed along to HCHI ratepayers.

b) Clearances from Guy Wires

- 33) Based upon the Applicant's proposed transmission line route, HCHI anticipates the Applicant will require guy wires near roadways for at least 3 separate locations. There may be several more guy wires required for the Project but such information is not currently available. HCHI requests the Board order Summerhaven avoid installing guy wires within a municipal road right right-of-way.
- 34) The installation of the guy wires within the municipal right-of-way will create a greater risk to HCHI's distribution system as the guy wires may be struck by cars and will also restrict HCHI's ability to work in and locate facilities within the municipal right-of-way.
- 35) A prohibition upon installing guy wires within the municipal right-of-way will most likely necessitate that transmission span guys cross over the roadways and in these cases HCHI asks that appropriate clearances under the span guys be provided for HCHI to construct two 27.6 kV 3 phase circuits as described in drawing 01-316 of the Kinectrics Report 6, including the neutral height of 25 feet above the crown of the road.

c) Separation Distance of Pole Lines

- 36) Based upon the current proposal, the Proposed transmission line will run parallel to the existing HCHI distribution system on Concession 5 west of Cheapside Road and the proposed distribution system on between Cheapside Road and the Summerhaven transformer station. This is a distance of approximately 2,000 metres.
- 37) HCHI would suggest that Summerhaven be required to move the transmission pole line a minimum of 10 metres from the edge of the municipal right-of-way. The existing HCHI distribution system is located approximately 1 to 1.3 metres inside the municipal right-of-way.
- 38) The Applicant is in the process of procuring a 30 metre easement immediately south of the south side of the Concession 5 municipal right-of-way. However, the Applicant has not proposed to locate the transmission poles near the centre of the easement, rather, it has proposed to locate the poles approximately 3.4 metres from the edge of the municipal right-of-way and 4.7 metres from HCHI's distribution pole line.

- 39) HCHI, in response to Summerhaven IR#1, confirmed its plan to upgrade the existing distribution system to 27.6kV which will require a higher pole than the existing poles. The proposed design of Summerhaven would not allow for sufficient clearances from such higher poles. Further, HCHI would intend to build the upgrade in approximately the same location as the existing distribution line. Construction on the opposite side of the municipal right-of-way would not be HCHI's preference as it would likely be more expensive (such costs being passed along to the ratepayers) and would be inconsistent with the policy of only locating poles along only 1 side of the municipal right-of-way.
- 40) In response to Board Staff IR#1, HCHI confirmed the minimum 10 metre diagonal distance was based upon the CSA Standard CSA-C22.3 No.6. The distance is intended to ensure that a lightning strike to the 230kV line, which proposed to have at least 29 metre transmission poles, will not cause sustained arcing below grade to ground rods associated with HCHI's distribution poles. Sustained arcing could cause equipment failure for both HCHI and its customers.
- 41) The consequences of locating the transmission line is that sustained arcing could occur and cause a deterioration in the quality of service to such an extent that equipment would fail.
- 42) The resulted in the recommendations provided in the Kinectrics Report which is reproduced below:
- “Due to its proximity, the transmission line will provide lightning protection against direct lightning strikes. It is recommended to maintain a minimum distance of 10 m or more between the transmission and distribution system poles to limit the GPR (Ground Potential Rise) transfer during lightning strikes to the transmission line and 60Hz faults.” (page 5)
- 43) HCHI would suggest that Summerhaven be required to move the transmission pole line a minimum of 10 metres from municipal right-of-way. This will ensure the minimum distances between poles fulfills the Kinectrics recommendations. This will not increase the requirements for Summerhaven to obtain greater land rights as it can still be located within the 30 metre easement.
- 44) HCHI would note that the only evidence on the record regarding induction and lightning has been submitted by HCHI and that the Applicant has performed no such analysis of the issue. Permitting the proposed transmission line to be located less than 10 metres from the existing distribution line will expose the customer to risks regarding reliability and potentially additional costs.
- 45) As such, HCHI submits that the Board should accept the evidence and impose the separation distance.

d) Consideration of HCHI Future Needs

- 46) The Project, the selection of the transmission pole and the routing has been developed based solely upon the existing 4.8kV distribution system. The currently proposed design of Summerhaven would not allow for sufficient clearances from higher distribution poles.

- 47) When the Application was filed, HCHI understood that the 34.5kV collector lines would be run overhead. Therefore, HCHI requested that the transmission line be designed in recognition that HCHI would install new poles that would have both the 34.5kV collector lines and would be able to accommodate two 27.6kV 3 phase circuits. This would permit HCHI to upgrade the system in accordance with its current plan and would permit a future user to have space on the pole.
- 48) HCHI now understand that the Applicant will bury its 34.5 kV collector lines along Concession 5 Road and will not have overhead collector lines along this roadway, based upon the Technical Conference (starting at page 44, line 24 to page 50, line 27).
- 49) In response to Summerhaven IR#1, HCHI confirmed its plan to upgrade the existing distribution system to 27.6kV in the area of the Project. HCHI's plan is to upgrade the distribution system to two 27.6 kV 3 phase circuits as described in drawing 01-316 of the Kinectrics Report, including the neutral height of 25 feet above the crown of the road.
- 50) The distribution system is constantly evolving to meet the needs of its existing and future customers.
- 51) Thus, in order to avoid irresolvable future problems, HCHI requests the Board to order the Applicant to design and build its transmission line pole locations, pole heights, and clearances relative to an HCHI distribution line consisting of two 27.6 kV 3 phase circuits as described in drawing 01-316 of the Kinectrics Report, including the neutral height of 25 feet above the crown of the road, rather than the existing 4.8 kV existing single phase line as proposed by the Applicant. Any such order should include HCHI poles located midspan between two transmission poles where the transmission conductor sag is greatest and its swing arc also the greatest under the most severe weather and loading conditions.
- 52) HCHI understands that this requirement could be satisfied through the imposition of the minimum 10 metre clearance requested above.

e) The 2 Individual Switching Stations or a Common Switching Station

- 53) There has been significant discussion during the Proceeding regarding the connection to the Hydro One transmission grid. The IESO's System Impact Assessment contained a strong recommendation for the Applicant to have a common connection for the Project and a separate wind farm, the Port Dover and Nanticoke Wind Project, being developed by Capital Power Holdings Inc., an intervenor in this Proceeding. The Applicant's current proposed Project does not utilize the common connection.
- 54) On June 21, 2011 Hydro One responded to certain interrogatories regarding the use of either a single common connection. Hydro One's response to IESO IR#4 details the benefits of a common connection which include:
- "Lower overall capital cost;
 - Enhanced reliability;
 - Reduced environmental impact;
 - More efficient use of Hydro One Engineering and Construction Resources; and
 - Lower future OM&A costs (e.g. maintenance)."

55) Two of the listed elements indicate that consumers will be exposed to higher costs with the currently proposed switching station for each wind project. The other indicates that the common station will have better reliability.

56) The Board is guided by the objectives of the OEB Act, section 1, in carrying out its mandate in respect of electricity.

1. (1) The Board, in carrying out its responsibilities under this or any other Act in relation to electricity, shall be guided by the following objectives:

1. To protect the interests of consumers with respect to prices and the adequacy, reliability and quality of electricity service.

2. To promote economic efficiency and cost effectiveness in the generation, transmission, distribution, sale and demand management of electricity and to facilitate the maintenance of a financially viable electricity industry.....

5. To promote the use and generation of electricity from renewable energy sources in a manner consistent with the policies of the Government of Ontario, including the timely expansion or reinforcement of transmission systems and distribution systems to accommodate the connection of renewable energy generation facilities.

57) The difficulty for HCHI is the evidence indicates that, from the perspective of the consumer, a better, lower cost solution is available and, yet, that is not the proposal that is before this Board. It seems antithetical to HCHI that a regulatory scheme to advance the public interest would endorse a higher cost, technically inferior design for the very public the Board is to protect. The extent to which this is a systemic problem of the regulatory scheme is unclear to HCHI.

58) HCHI recognizes that, at this time, this type of situation is relatively novel. However, given the move number of new generating projects and additional transmission connections that will be required to accommodate these projects, the potential for similar situations in the future is obvious. HCHI would request the Board provide guidance to the industry regarding the expectations of the Board in this regard in order that industry participants can properly organize their projects.

PART IV. CONCLUSIONS

59) HCHI formally request that any order(s) granting leave to construct the Project include the following conditions:

- a) The Applicant must design and build its transmission line pole locations, pole heights, and clearances relative to an HCHI distribution line consisting of two 27.6 kV 3 phase circuits as described in drawing 01-316 of the Kinectrics Report, including the neutral height of 25 feet above the crown of the road; including HCHI poles located midspan between two transmission poles where the transmission conductor sag is greatest and its swing arc also the greatest under the most severe weather and loading conditions.

- b) All road crossings shall be designed and built to provide adequate clearance for HCHI's future needs, based upon two 27.6 kV 3 phase circuits as described in drawing 01-316 of the Kinectrics Report, including the neutral height of 25 feet above the crown of the road, to cross under the transmission line safely.
 - c) That the centreline of the proposed 230kV transmission line along Concession 5 be located on private property at least 10 metres from the property line of the municipal right-of-way the roadway and that the design ensure the maximum swing arc or blowout for the transmission line conductor remains within the Applicant's easement.
 - d) That guy wires not be anchored within a municipal road right right-of-way.
 - e) Where any span guys cross over the roadways that appropriate clearances under the span guys be provided for HCHI to construct two 27.6 kV 3 phase circuits as described in drawing 01-316 of the Kinectrics Report 6, including the neutral height of 25 feet above the crown of the road.
- 60) HCHI recognizes these requests are very specific technical requirements. However, HCHI submits the imposition of such restrictions are appropriate in the circumstances. As noted, the Applicant has not provided a sufficiently detailed design to ensure these requirements are fulfilled and HCHI has no contractual relationship with Summerhaven in respect of the Project to obligate Summerhaven to design the Project in this manner. As such, including these requirements in an order of the Board ensures HCHI's request will be fulfilled and will protect the public interest.

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

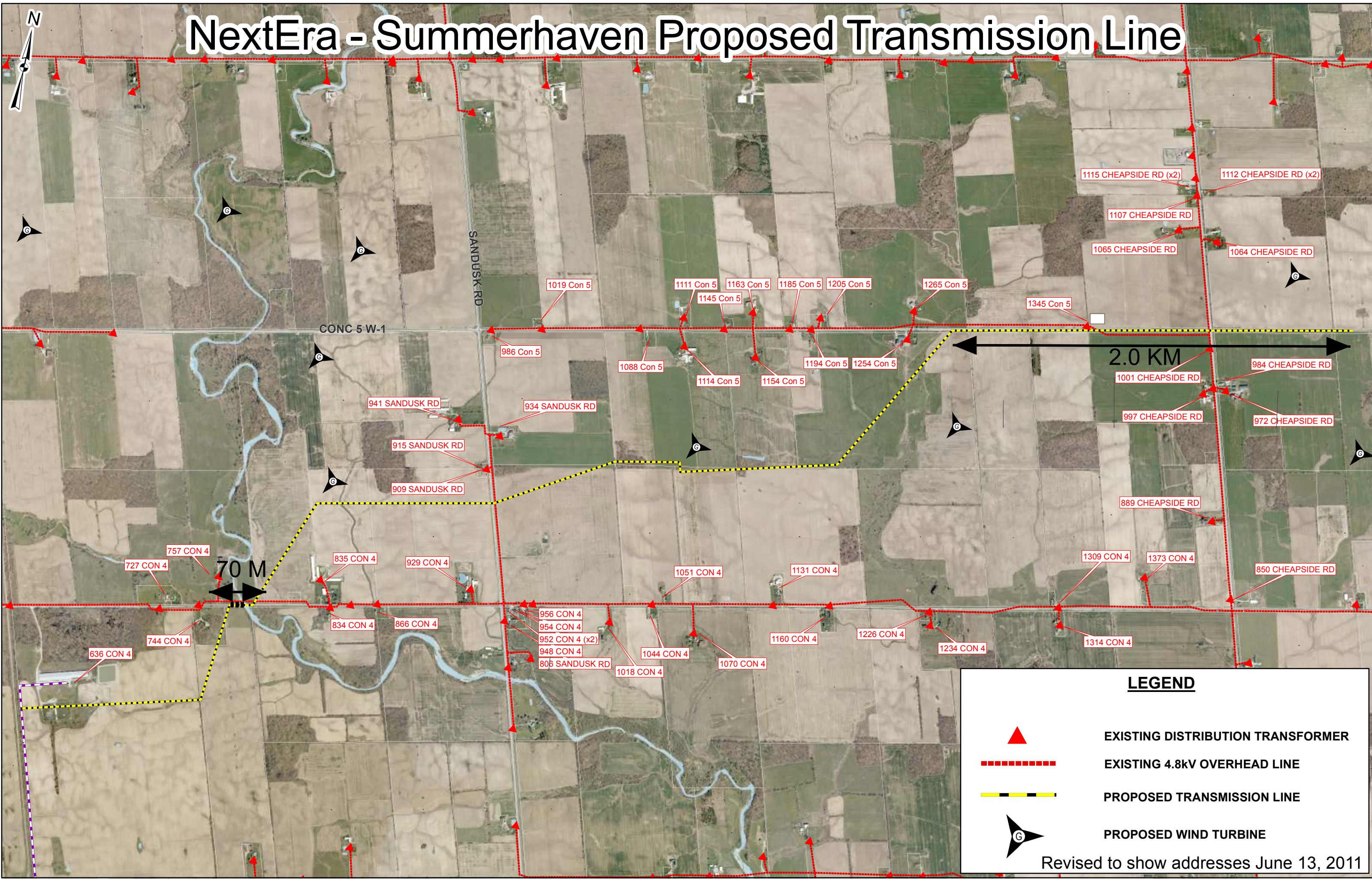
June 22, 2011

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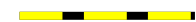

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County Hydro Inc.

NextEra - Summerhaven Proposed Transmission Line



LEGEND

-  EXISTING DISTRIBUTION TRANSFORMER
-  EXISTING 4.8kV OVERHEAD LINE
-  PROPOSED TRANSMISSION LINE
-  PROPOSED WIND TURBINE

Revised to show addresses June 13, 2011