

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 McLean's
Mountain Wind LP for an Order granting leave to construct a
new transmission line and associated facilities.

**MCLEAN'S MOUNTAIN WIND LIMITED PARTNERSHIP
RESPONSES TO MCSEA, LSARC, BAYNICHE CONSERVANCY,
WIKWEMIKONG ELDERS, COMMUNITY AND YOUTH, AND
MANITOULIN NATURE CLUB SUPPLEMENTARY INTERROGATORIES**

DELIVERED MARCH 30, 2012

INTRODUCTION:

The following interrogatories were delivered on March 5, 2012 by Raymond Beaudry on behalf of MCSEA, LSARC, Bayniche Conservancy, Wikwemikong Elders, Community and Youth, and Manitoulin Nature Club. For organizational purposes, in order to distinguish this series of interrogatories from those delivered by Mr. Beaudry on March 2, 2012, the March 5th series of interrogatories is referred to as the supplementary interrogatories of MCSEA, LSARC, Bayniche Conservancy, Wikwemikong Elders, Community and Youth, and Manitoulin Nature Club.

Please note that McLean's has renumbered Mr. Beaudry's "Supplemental Questions Related to Mapping Errors". They were numbered 10-12, but since there were two Question 10s in Mr. Beaudry's March 5th list of questions, they have been renumbered as Questions 11-13.

On March 13, 2012, Mr. Beaudry sent another question by email addressed to counsel to McLean's. This has been added to the Supplementary Interrogatories as Question No. 14, and is addressed below.

Reference: Exhibit G, Tab 1, Schedule 2

Question 1

In relation to Facility Type, what are "segments"? Please define "segment" in this context.

Response:

The transmission line is made up of 2 segments. The first segment is overhead and runs from the substation to the transition station. The second segment runs from the transition station to the switching station and is either underwater or underground.

Question 2

Where are the segments referenced in the Application?

Response:

The term "segments" is only used in this part of the Application.

Question 3

Please provide a detailed explanation of the location and types of facilities to be constructed on Pt Lot 10 Conc 7.

Response:

No part of the infrastructure that is the subject of this Application is located on Pt Lot 10 Conc 7.

Question 4

Please identify which lands are required for conductor crossing only.

Response:

The map in Exhibit E, Tab 2, Sch. 2 clearly shows the route of the transmission line and all properties over which this transmission line crosses.

Question 5

According to Exhibit G, Tab 1, Schedule 2, no lands for the proposed project are required on Goat Island. Please explain the absence of Goat Island lands from the exhibit.

Response:

The table in Exhibit G, Tab 1, Schedule 2 lists all the properties which the Applicant either owns or has an option to own or lease. Exhibit G, Tab 1, Schedule 1 acknowledges that negotiations with the owner of Goat Island are ongoing. Because there is no agreement with the owner of Goat Island, that property was not included in the table in Exhibit G, Tab 1, Schedule 2.

Question 6

Please identify which lands are required for fenced-in areas and the sizes of those fenced-in areas.

Response:

There are 3 fenced in areas as follows: 1) The Substation; 2) The Transition Station and 3) The Switching Station. Preliminary designs of these facilities which show the fenced-in areas and their dimensions can be found in Exhibit E, Tab 1, Schedule 3.

Question 7

Please identify which lands are required for submarine cable routes.

Response:

Please refer to the map in Exhibit B, Tab 2, Schedule 1 and Exhibit C, Tab 2, Schedule 1 which describes the route of the transmission line including the crossing of the North Channel.

Question 8

We note that there are often several owners of parcels of lands within a lot where there are part lots. Please identify which part of part lots are required. Please provide a map depicting all land requirements within part lots.

Response:

Exhibit G, Tab 1, Schedule 2 lists all the lots currently owned or under option by the Applicant. As the Applicant has explained previously (see Exhibit G, Tab 1, Schedule 1), "With the exception of the lands on Goat Island required to get to and to allow for the connection/switching station no additional easements are required for the project." The PIN numbers and descriptions are included in the table that follows in Exhibit G, Tab 1, Schedule 2 and have been provided in confidence. The precise location of the transmission facilities on these properties will be determined later as part of the detailed engineering.

McLean's notes that the table in Exhibit G, Tab 1, Schedule 2 inaccurately identifies Pt Lot 10 Con 7 as being required for the facilities that are part of this Application. The inclusion of this property on this list was a clerical error. As noted in response to Supplementary Question 3, above, no part of the infrastructure that is the subject of this Application is located on Pt Lot 10 Con 7.

Question 9

Please identify road allowances used in lands required.

Response:

Please see Exhibit D, Tab 2, Schedule 1, which states:

“At the intersection of McLean's Mountain Road and Morphet's Side Road, the overhead transmission line will run west along the Morphet's Side Road allowance for 1.7 km to the intersection of Morphet's Side Road and an unopened road allowance, which is aligned with Boozeneck Road to the north west. The transmission line will then run 2.2 km north west to Harbour View Road. From Harbour View Road, the transmission line runs 2.2 km east on the road allowance until it reaches the transition station on part of lot 21, Concession 12, Howland Township. As illustrated above, the transmission line is primarily routed along municipal road allowances in order to minimize the impact of the transmission line on private lands.”

Question 10

Please identify the lands required for poles anchoring and guying.

Response:

The current design anticipates self supporting poles and as such no additional lands are required for anchoring and guying.

SUPPLEMENTAL QUESTIONS RELATED TO MAPPING ERRORS

Reference: Exhibit E Tab 1 Schedule 2

Question 11

Please confirm the orientation of Espanola T.S. and Manitoulin T.S.

Response:

Exhibit E, Tab 1, Schedule 2 is a single line diagram. Espanola T.S. is located north of the connection point and Manitoulin T.S. is located west of the connection point.

Reference: Exhibits: Exhibit B Tab 2, Schedule 1 last page, Exhibit D2 Tab 2 Schedule 2, Exhibit H Tab 1 Schedule 3

Question 12

In reference to land matters and mapping on the above noted exhibits:

- a) please identify the HONI Manitoulin Transformer Station in relation to the proposed route on Goat Island.
- b) please verify the location of the Connection/Switching station along Hwy 6 on Goat Island.
- c) please correct all maps to accurately reflect the normally travelled portion of Hwy 6 and the abandoned section of Hwy 6 clearly identified.

Response:

- a) Please see the sketch in Attachment 2 to the Applicant's response to Board Staff Interrogatories which shows the proposed location of the buried cable and Switching Station on Goat Island. The HONI Manitoulin Transformer Station is approximately 700 M to the north west of the Switching Station.
- b) Please see Attachment 2 to the Applicant's response to Board Staff Interrogatories.
- c) Please see Attachment 2 to the Applicant's response to Board Staff Interrogatories. The switching station is located in the area adjacent to the existing 115 kV transmission corridor with dimensions 75.9 metres on the east, 49.1 metres on the west and 28 metres wide on the south.

Question 13

Attached is a picture of Morphet's Sideroad on McLean's Mountain looking east beside lot 3 conc 7 and lot 3 conc 6. Please identify the trees that will be removed requesting our apple trees on the left remain.

Response:

On Morphet's Sideroad the transmission line will run on the municipal road allowance only. Some pruning of trees on private property to maintain electrical clearance from the wire may be required, but no trees on private lands will be removed. Trees on the right of way that need to be removed will be identified during construction.

Question 14

In reviewing your prefiled application, we notice there appears to be some missing pages in section Exhibit H, Tab 1, Sch 2. This gap came to our attention when we were comparing the Aboriginal Consultation reports to the Community and Stakeholder Consultation reports.

The above identified exhibit documents the applicant's consultation record. However, the filed material is based on a project capacity and design in number of turbines inconsistent with the application before the board (77 MW then vs. 60 MW now). In addition, the overland element of the transmission routing information is inconsistent with other portions of this application (e.g. submarine cable entry point area).

Please confirm that there was no community consultation in relation to this application following March 22, 2010.

Appendix A provides the applicant's evidence on Aboriginal Consultation. The MMP - Northland Power Inc partnership announcement included in the application is dated February 10, 2011. The Aboriginal Communications Log was updated July 2011. However, the communications log provided includes no information after July 24, 2010, although the document indicates that it was revised in July 2011. Communication after July 24, 2010 appears to be missing.

Please confirm that there was no aboriginal consultation after July 24, 2010 in relation to this application.

Response:

Exhibit H, Tab 1, Schedule 2 includes extracts from the Final Consultation Report which was submitted in its entirety in September 2011 as part of McLean's REA application process. The complete REA application is being provided on a CD in response to Board Staff Interrogatory No. 4(2). It is incorrect to suggest that there was no consultation after July 2010. Under the REA process, McLean held its final Public Information Centre, which included details on the transmission facilities that are the subject of this Application, on May 18, 2011.

The transmission line for the McLean's Mountain Wind Farm was always planned to have a capacity of 100 MW irrespective of the size of the wind farm that would be initially constructed.

The preliminary engineering of the transmission line which was completed in July 2011 anticipated that the overhead to underground transition station would be located close to the water's edge. For aesthetic reasons it is more desirable to have this station further inland to minimize the visual impact of the overhead portion of the line. In September 2011 McLean signed an option agreement for property further away from

the shoreline, but still on the route of the overhead transmission line on Harbour View Road which allowed for this improvement.

The Aboriginal Consultation Log only records consultations up to July 24, 2010. After July 24, 2010 Northland and the UCCM negotiated and then entered into an agreement to partner on McLean.