



P.O. Box 397, Stratford, Ontario N5A 6T5

187 Erie Street, Stratford
Telephone: 519-271-4700
Fax: 519-271-7204
www.festivalhydro.com

BY EMAIL AND COURIER

April 17, 2012

Ms. Kirsten Walli
Secretary
Ontario Energy Board
Suite 2700, 2300 Yonge Street
PO Box 2319
Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: Service Area Amendment between Festival Hydro Inc. and Hydro One Networks Inc.

Festival Hydro Inc. (Festival) respectfully submits the enclosed documentation in support of a minor Service Area Amendment. Given that there will be no adverse impacts on existing customers (as this is a new subdivision), and that the incumbent distributor, Hydro One Networks Inc. (Hydro One) is in support of this amendment, we ask that the Board dispose of this proceeding without a hearing in accordance to the provisions in Section 21 (4) (b) in the *Ontario Energy Board Act*.

The section of land in question is presently included in Hydro One's defined service area, but is vacant, unserviced land abutting property serviced by Festival.

Festival proposes to amend Schedule 1 of Electricity Distribution Licence ED-2002-0513 Festival Hydro Inc. to add the following:

12. Part of Lots 3 & 4 and all of blocks S, U & V, Concession 2 (Geographic Township of Ellice), Registered Plan No. 11, City of Stratford, County of Perth

Upon approval of this application, Hydro One's Distribution Licence would be amended as per their documentation included in Exhibit A, Tab 1, Appendix G of the attached application.

Contact information for all parties is included in the Application, found at Exhibit A, Tab 1.

Sincerely,
FESTIVAL HYDRO INC.

ORIGINAL SIGNED BY JAC VANDERBAAN

Jac Vanderbaan, P.Eng., CMA
Chief Operating Officer

Enclosures

Cc:	Alex Urbanowicz (Hydro One)	Yoon Kim (Hydro One)
	Angela Yorgiadis (Hydro One)	Robert Stratford (RW Stratford Consulting)

**Service Area Amendment Application
Festival Hydro Inc.
&
Hydro One Networks Inc.**

Preamble:

Festival Hydro Inc. ("Festival") is submitting the pre-filed evidence herein in support of its application for an amendment to the distribution license ED-2002-0513 to the service area description. This information has been prepared following the Ontario Energy Board's "Filing Requirements for Service Area Amendment Applications" (the "Guide") dated March 12, 2007 and generally follows the format of the Guide in the presentation of the evidence.

General Information:

Applicant:	Festival Hydro Inc. ED-2002-0513
Incumbent Distributor:	Hydro One Networks Inc.
Affected Parties:	Customer Representative – R.W. Stratford Consulting Inc. Landowner Representative – GSP Group

Alternate Distributors:	None
-------------------------	------

Contact Information:

Applicant

Festival Hydro Inc.
187 Erie Street
PO Box 397
Stratford, ON
N5A 6T5

Bill Zehr, CGA
President & CEO
Tel 519-271-4703 extension 243
Fax 519-271-7204
bzehr@festivalhydro.com

Jac Vanderbaan, P.Eng., CMA
Chief Operating Officer
Tel 519-271-4703 extension 241
Fax 519-271-7204
vanderj@festivalhydro.com

Legal Counsel for Festival Hydro

Scott Stoll, LLB, P.Eng.
Aird & Berlis LLP
Brookfield Place, 181 Bay Street
Suite 1800, Box 754
Toronto, ON
M5J 2T9
sstoll@airdberlis.com
Tel: (416) 865-4703
Fax: (416) 863-1515

Incumbent Distributor

Hydro One Networks Inc.

Yoon Kim
Applications Analyst, Regulatory Affairs
Hydro One Networks Inc.
Phone: 416-345-5228
Fax: 416-345-5866
E-mail: Yoon.Kim@HydroOne.com
483 Bay Street
South Tower, 8th floor
Toronto, ON, M5G 2P5

Customer/Landowner

R.W. Stratford Consulting Inc.

Robert Stratford, P.Eng.
Tel 519-857-8806
bob.stratford@rwsconsultinc.ca
650 Waterloo Street, Ste. 101
London, ON N6B 2R4

Landowner

GSP Group

Tel 519-569-8883
Fax 519-569-8643

72 Victoria Street South, Suite 201
Kitchener, ON N2G 4Y9

Reasons for Amendment:

The proposed amendment is requested as Festival's licensed service area does not include the Property but is adjacent to the edge of the Property. The Property abuts the parcel of land that was included in Festival's licensed service area through a service area amendment granted by the OEB in 2006, file number EB-2006-0126. A map of the Property showing the proposed road extensions, lots, and adjacent properties may be found at Exhibit A, Tab 1, Appendix A. The Property is located within an area of land that was annexed by the City of Stratford in 2007. The proposed amendment is consistent with the objective of a rational and efficient service area alignment based on both economic and engineering efficiency and is the environmentally preferred option.

Festival has existing infrastructure in close proximity to the subject Property that can provide the required electrical service for this Property with minimal investment and no contribution in aid of construction is required from the Customer. The incumbent distributor (Hydro One) does not have infrastructure adjacent to the Property and Hydro One (or the Customer) would need to make a significant investment to expand and upgrade their infrastructure to service this Property. In order to serve the Customer, Hydro One would have to construct a new line crossing private property.

Festival currently provides service to the properties adjacent to the subject Property that are within the City of Stratford.

Description of Proposed Service Area:

The Property consists of approximately 11.4 hectares of undeveloped land annexed by the City of Stratford in 2007, and abutting properties currently within Festival's service area. The legal description of the land is as follows:

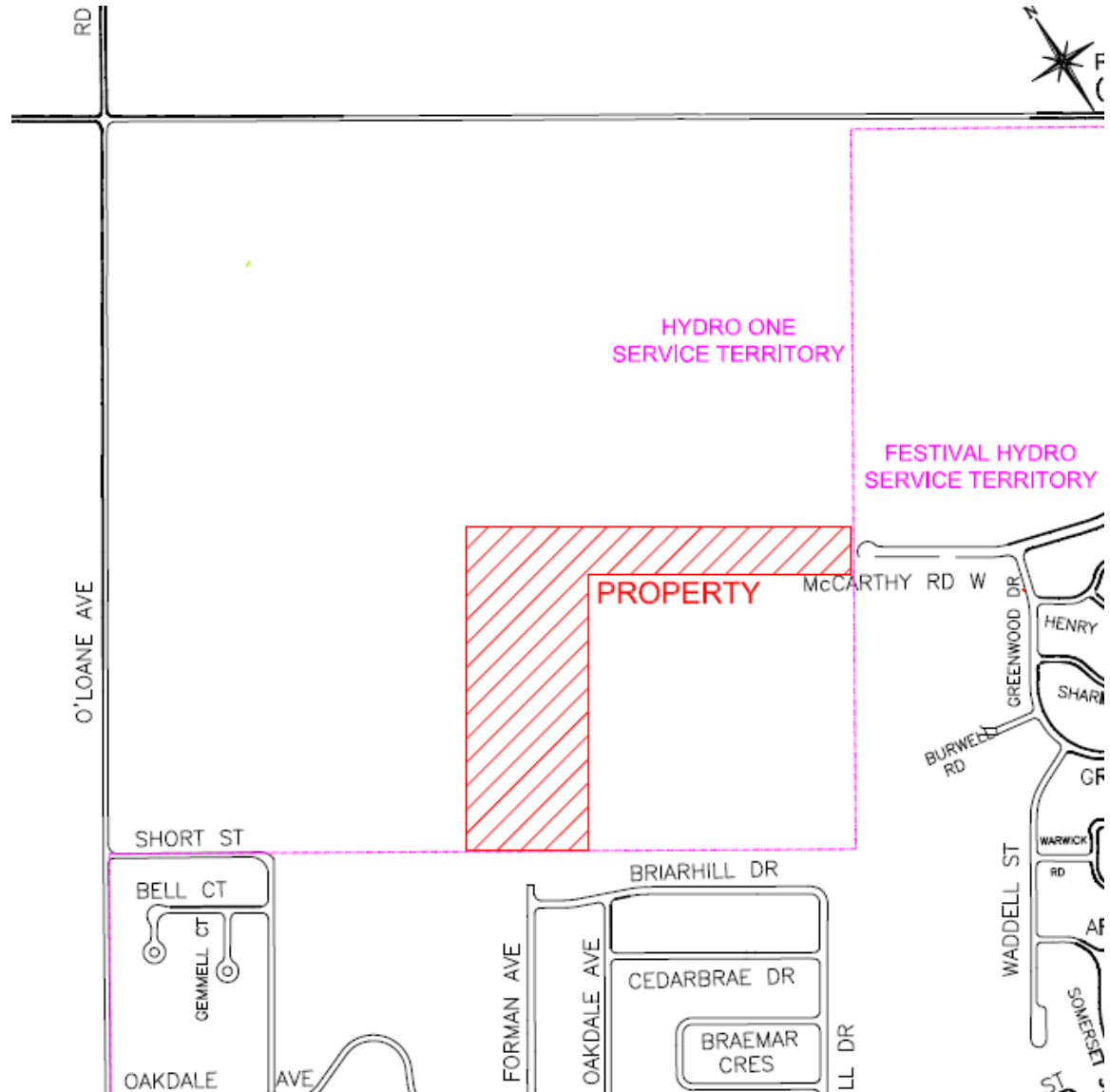
Part of Lots 3 & 4 and all of blocks S, U & V, Concession 2 (Geographic Township of Ellice), Registered Plan No. 11, City of Stratford, County of Perth

The Property will be accessed and serviced from an existing circuit located on the south side of McCarthy Avenue, which will be extended through the development to connect with another existing circuit located on the east side of Forman Avenue.

The Property is zoned Residential and the proposed development will consist of 125 residential lots.

Area Maps

Below is a Key Map showing the location of the Property relative to the existing boundaries between Festival and Hydro One.



The drawing in Exhibit A, Tab 1, Appendix A shows the boundaries of the Property for which Festival is making this application (the part numbers refer to the legal description).

For clarity, this application is limited to the lands outlined in red in the sketch above, and more specifically outlined in the Draft Plan of Subdivision in Appendix A. The lands marked as “Additional Lands Owned by Applicant” on the Draft Plan of Subdivision will remain Hydro One service area.

Included in Exhibit A, Tab 1, Appendix B is a drawing which shows the existing distribution facilities of both Festival and Hydro One.

Distribution Infrastructure In and Around the Proposed Amendment Area

The amendment area will have a residential subdivision consisting of 125 lots and 88 blocks. Festival has an existing 27,600 V. circuit on the south side of McCarthy Ave., and will supply the subdivision via an underground road crossing. The underground circuit will extend through the development to connect with the existing overhead 27,600 V. circuit on the east side of Foreman Ave., providing an alternate supply path.

The landowner owns additional vacant land north and east of the development, however at this time has no development plan or plan of subdivision for such property.

Efficient Rationalization of the Distribution System

The proposed Service Area Amendment will optimize the use of Festival’s existing infrastructure.

A descriptive comparison of use of the distribution systems of Festival and Hydro One is given below. All distances and costs provided have been generated by Festival Hydro using best available data and typical costing.

	FESTIVAL HYDRO	HYDRO ONE
Location of Point of Delivery and Point of Connection	Delivery Point and Connection Point will be an existing circuit on the south side of McCarthy Ave. adjacent to the subject property.	Delivery Point and Connection Point would be a new circuit extended to the west end of the subject property.

Proximity of Proposed Connection to Existing, Well-Developed Distribution System	Approximately 20m from existing 3 phase 27.6 kV feeder on McCarthy Ave, and approximately 20m from existing 3 phase 27.6 kV feeder on Forman Ave.	Approximately 500m across private property to existing 3 phase distribution on Quinlan Road and approximately 450m across private property to existing 3 phase on O'Loane Ave.
Fully Allocated Connection Costs	Approximately \$5,000.00 to frame two existing dip poles for connection and extend a three phase U/G primary circuit to the development.	Approximately \$150,000 to \$175,000 to extend a primary circuit to the development.
Capital Contribution Required from Customer	None for extending the feeders to this development.	Some, depending on the results of a detailed cost recovery calculation.
Costs of Stranded Equipment	None.	None.
Reliability Impacts	None.	None.
Provide for Future Growth in Area	Yes.	Yes.
Provide for Cost Efficient Improvements in the Area	Yes.	No.

Description of Impacts

Affected Customers or Landowners:

The only directly affected customer is the end use customer identified as the Northwest Stratford (2009) Developments Inc.

Impacts on Costs, Rates, Service Quality and Reliability for Area Customers:

Festival

Cost – impact is negligible since primarily existing infrastructure will be utilized.
Rates – a favourable impact is expected as the utilization of existing infrastructure will be greater and gross revenue will increase.

Service Quality – no impact to service quality as the Application represents only a small group of residential customers to be connected to an existing feeder.
Reliability – no impact to system reliability.

Impacts on Customers Outside the Area:

This Service Area Amendment application is not expected to have any impacts on customers outside of the immediate area.

Impacts on Each Distributor:

Festival will see a marginal increase in asset base and an increase in revenue, with minimal impacts to operating and administrative costs.

Hydro One is not expected to be significantly impacted by this Service Area Amendment application since it affects none of their existing infrastructure or customers. Hydro One will see a slight load increase on its feeders to Festival.

Assets Stranded or Redundant:

No assets will be stranded or made redundant.

Assets Transferred:

No assets will be transferred.

Customers Transferred:

No customers will be transferred.

Load Transfers or Retail Points Eliminated:

None.

New Load Transfers or Retail Points:

None.

Evidence of Consideration and Mitigation of Impacts

Customer/Landowner:

The Customer, R. W. Stratford Consulting Inc, was advised by Festival Hydro in February of 2011 that the proposed development was within Hydro One's Service Area, but immediately adjacent to Festival Hydro's Service Area. The customer was directed to contact the incumbent distributor, Hydro One, to request servicing details, and the customer was informed that Festival Hydro could service this development if the OEB granted a Service Area Amendment. A copy of the email to the customer and their acknowledgement is in Exhibit A, Tab 1, Appendix C. A copy of email correspondence between the customer and Hydro One is in Exhibit A, Tab 1, Appendix D.

Incumbent Distributor:

Hydro One Networks Inc. has indicated they support this Service Area Amendment. See letter of support in Exhibit A, Tab 1, Appendix F.

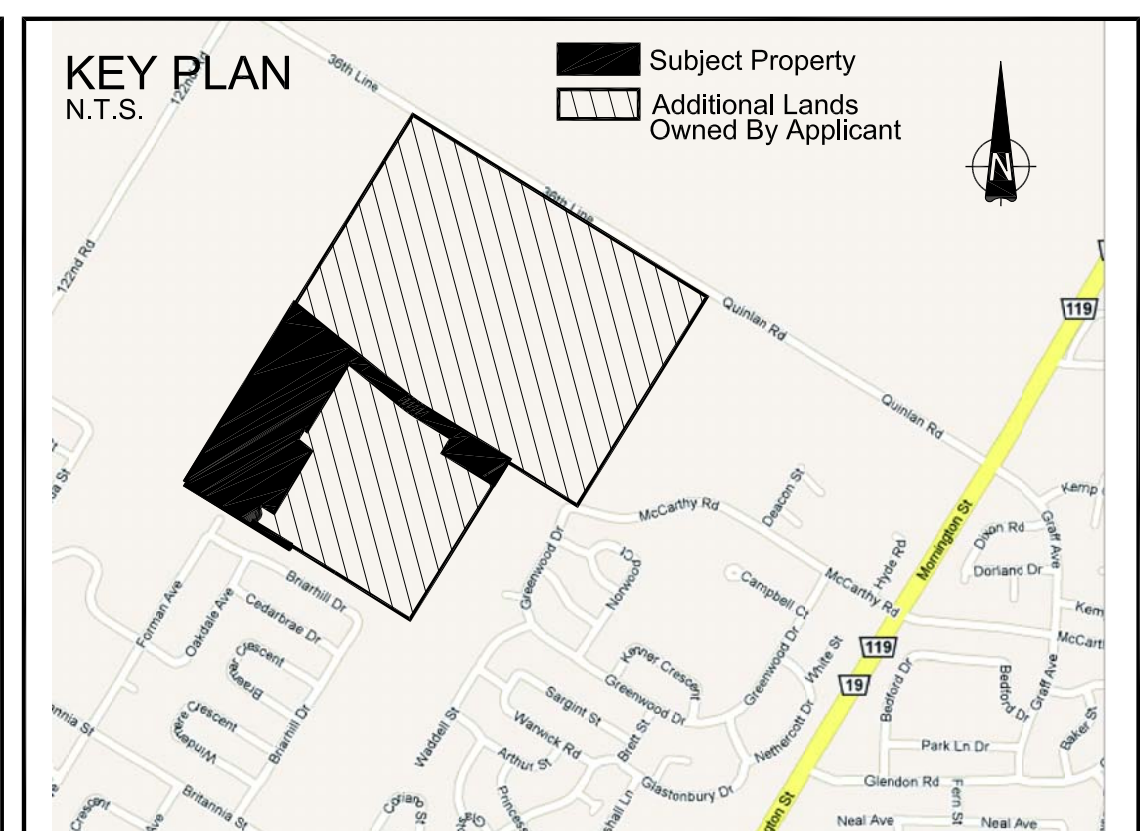
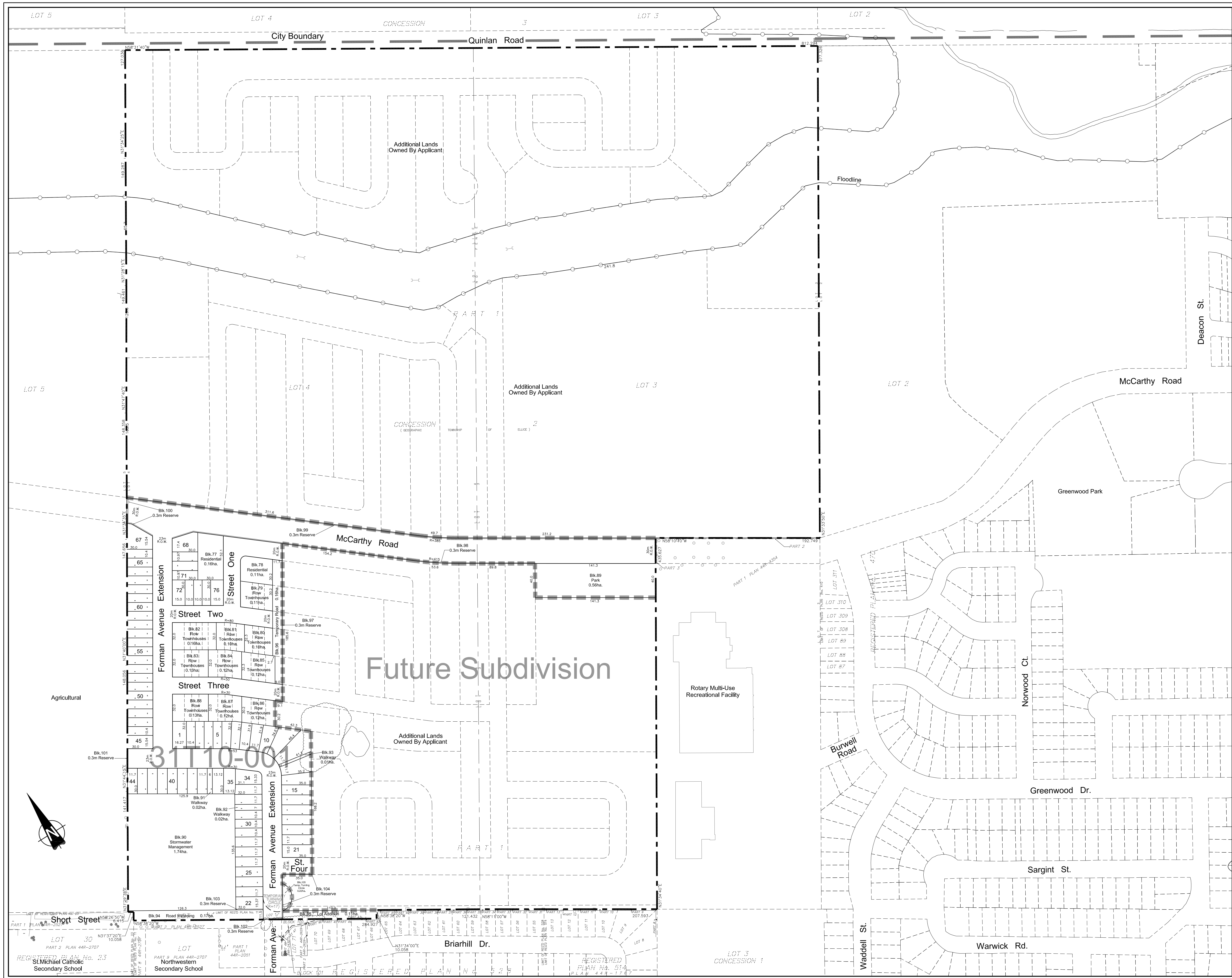
Customer Preference:

The customer has indicated they prefer that Festival be their distributor. This is outlined in their letter in Exhibit A, Tab 1, Appendix E.

Additional Information for Contested Applications

This application is not being contested by any affected party.

APPENDIX A
MAP OF THE PROPERTY



DRAFT PLAN OF SUBDIVISION

Part of lots 3 & 4 and all of blocks S, U & V
Concession 2
(Geographic Township Of Ellice)
Registered Plan No.11
City of Stratford
County of Perth

LAND USE SCHEDULE			
	LOTS/BLKS.	UNITS	AREA (ha.)
Single-Detached Residential	1-76	76	2.95
Residential	77, 78	7	0.27
Row Townhouses	79-88	42	1.21
Park	89		0.56
Stormwater Management	90		1.74
Walkway	91-93		0.05
Road Widening	94		0.17
Lot Addition	95		0.11
Temporary Road	96		0.16
0.3m Reserve	97-104		0.00
Temporary Turning Circle	105		0.02
Roads			4.12
Total Phase 1		125	11.36


ADDITIONAL INFORMATION
(UNDER SECTION 51(17) OF THE PLANNING ACT)
INFORMATION REQUIRED BY CLAUSES a,b,c,d,e,f,g,j and l ARE AS SHOWN ON DRAFT PLAN.
h) Municipal water supply
i) Clay loam
k) All municipal services as required

OWNER'S CERTIFICATE
I AUTHORIZE THE GSP GROUP INC. TO PREPARE AND SUBMIT THIS DRAFT PLAN OF SUBDIVISION TO THE CORPORATION OF THE CITY OF STRATFORD.

Jeremy Matthews
MARCOR FARMS LTD. March 22, 2010
DATE

SURVEYOR'S CERTIFICATE
I CERTIFY THAT THE BOUNDARIES OF THE LAND TO BE SUBDIVIDED AND THEIR RELATIONSHIP TO THE ADJACENT LANDS ARE CORRECTLY SHOWN.

Jeremy Matthews
JEREMY O.E. MATTHEWS, O.L.S. March 18, 2010
DATE



201-72 Victoria Street South
Kitchener, Ontario N2G 4Y9
T 519 569 8883
F 519 569 8843
www.gspgroup.ca

REVISIONS	
June 21, 2010	
August 17, 2010	
October 15, 2010	
January 12, 2011	
May 18, 2011	

Date: March 17, 2010
Scale: 1:1500 metric

Drawn By: S.Loughran / J.B.
Project No.: 8004.40

APPENDIX B

EXISTING DISTRIBUTION FACILITIES OF FESTIVAL AND HYDRO ONE



HYDRO ONE 3 PHASE

QUINLAN ROAD

O'LOANE AVENUE
HYDRO ONE 3 PHASE

APPROX. 500m

FHI 3 PHASE 27.6kV

PROPERTY

APPROX. 450m

FHI 3 PHASE 27.6kV

MULTI-USE COMPLEX

AGRIPLEX 80626

BURWELL RD

OAKDALE AVENUE

NORTHWESTERN SCHOOL
80308

BRIARHILL DRIVE

CEDARBRAE DRIVE

BRAEMAR CRES

WADDELL STREET

Festival Hydro INC.

ELECTRICAL ENGINEERING SECTION

NORTHWEST STRATFORD DEVELOPMENTS INC. (2009)

DRAWN BY: G. BOROVIKIC	DATE:	SIGNATURE:
CHECKED BY: D. ECKEL	DATE:	SIGNATURE:
DRAWING DATE: 02/13/2012	PROJECT ID: N/A	SCALE: NTS
D. ECKEL MGR. ENGINEERING	B. ZEHR PRESIDENT	DWG. No. N/A

APPENDIX C

COMMUNICATION FROM CUSTOMER REPRESENTATIVE REQUESTING AN ESTIMATE FROM FESTIVAL

Jac Vanderbaan

From: Bob Stratford [bob.stratford@rwsconsultinc.ca]
Sent: February-07-11 2:35 PM
To: Jac Vanderbaan
Cc: Bill Zehr
Subject: RE: Northwest Stratford Developments - New Subdivision

Hello Jac

Thank you very much for your email. I am the owner's Engineer. The Owner is interested in Festival Hydro being the provider for these lands.

I will contact you later this week. Unfortunately, I am out of town late today and tomorrow, so it may be Thursday before you hear back from me.

I am confident we will get this all worked out in our common interest.

Regards

Bob Stratford, P.Eng.



R.W. Stratford Consulting Inc.
650 Waterloo Street, Ste. 101
London, ON, N6B 2R4
T: 519-857-8806, F: 1-888-536-8304
bob.stratford@rwsconsultinc.ca

From: Jac Vanderbaan [mailto:vanderj@festivalhydro.com]
Sent: Monday, February 07, 2011 1:30 PM
To: bob.stratford@rwsconsultinc.ca
Cc: Bill Zehr
Subject: Northwest Stratford Developments - New Subdivision

Bob,

I understand that you are working as a consultant for this development. As you are aware, this development is currently within Hydro One's Service Area, but immediately adjacent to Festival Hydro's Service Area. It is our opinion that Festival Hydro is in a better position to service this area as we have a feeder available at the end of McCarthy and at the end of Forman. Hydro One's nearest supply points are on O'Loane and Quinlan so they would need to cross private property to supply this development.

Festival Hydro can supply this development by submitting a Service Area Amendment request to the Ontario Energy Board. Festival Hydro has successfully amended our Service Area to supply developments around Stratford, including the City's Rec Centre which is adjacent to this development. We are familiar with the process and the requirements of the Ontario Energy Board. If we can start the process soon, we should have no problems resolving this in time to meet the projected timeline for servicing this development.

The developer or their engineer should make contact with Hydro One to request information about servicing this development since they are the incumbent electric distributor. They should also make formal contact with me to obtain an alternative proposal and to discuss further details on the process that Festival Hydro would take to make an application to the Ontario Energy Board to amend our Service Area to include this development.

Please contact me at your earliest convenience to discuss this further.

Jac Vanderbaan, P.Eng., CMA
Chief Operating Officer
Festival Hydro Inc.
519-271-4703x241

APPENDIX D

EMAIL BETWEEN CUSTOMER REPRESENTATIVE AND HYDRO ONE

Jac Vanderbaan

From: Bob Stratford [bob.stratford@rwsconsultinc.ca]
Sent: January-26-12 4:51 PM
To: Bill Zehr
Cc: Jac Vanderbaan
Subject: RE: Northwest Stratford Developments - New Subdivision
Attachments: new-plan1.dwg; General Plan.pdf

Hello Bill

My apologies for the significant delay here, but the owner had contemplated significant plan changes. Some revisions have been made but they are not significant. I have attached some AutoCad drawings here f they help you

Also below is an email received from Hydro One with an estimate provided.

We now wish to proceed with the request for a change in service area and if there is anything else I need to get to you please let me know.

Regards

Bob Stratford, P.Eng.



R.W. Stratford Consulting Inc.
650 Waterloo Street, Ste. 101
London, ON, N6B 2R4
T: 519-857-8806
bob.stratford@rwsconsultinc.ca

From: r.crane@hydroone.com [<mailto:r.crane@hydroone.com>]
Sent: September-12-11 9:31 AM
To: bob.stratford@rwsconsultinc.ca
Cc: donovan.dockrill@hydroone.com
Subject: FW: City of Stratford - New Subdivision

Morning Bob,

We can't provide you with a detailed design or an Offer to Connect if you don't pay the required fees. On the other hand I can give you a Class 'C' (+/- 50%) estimate at \$5000.00 to service each lot internal only. All external work will be extra costs (if applicable).

If you should have any questions or concerns, please do not hesitate in contacting me.

Regards

Ryan Crane

From: Bill Zehr [<mailto:bzehr@festivalhydro.com>]
Sent: September-23-11 1:16 PM
To: Bob Stratford
Cc: Jac Vanderbaan
Subject: RE: Northwest Stratford Developments - New Subdivision

Hi Bob

As per my voice mail message, I was curious if you had any response from Hydro One. Festival Hydro would like to proceed with the OEB application service area amendment. If we could include the Hydro costing correspondence, this would definitely speed up and streamline the process and decision.

Thanks again, please give me a call with an update. 519-271-4703 243

Bill Zehr

From: Jac Vanderbaan
Sent: Wednesday, August 03, 2011 2:53 PM
To: Bob Stratford
Cc: Bill Zehr
Subject: RE: Northwest Stratford Developments - New Subdivision

Bob,

Thanks for the information. Our Project Coordinator, Cathy Pearson, will get started on a draft Subdivision Servicing Agreement and get back to you early next week.

Jac Vanderbaan, P.Eng., CMA
Chief Operating Officer
Festival Hydro Inc.
Tel 519-271-4703x241
Fax 519-271-7204

APPENDIX E

LETTER FROM CUSTOMER TO FESTIVAL

Mr. Jac Vanderbaan, P.Eng, CMA
Chief Operating Officer
FESTIVAL HYDRO INC.
187 Erie Street, PO Box 397
Stratford, ON N5A 6T5

Dear Sir:

Re: HYDRO SERVICING FOR Coventry of Stratford Subdivision, Phase 1. IN STRATFORD, ONTARIO
Northwest Stratford (2009) Developments Inc.

As discussed previously, R. W. Stratford Consulting Inc. is the representative of Northwest Stratford (2009) Developments Inc., the owner/developer of a proposed residential subdivision in north Stratford.

Through our discussions, we understand that Festival Hydro can provide electrical servicing from both McCarthy Road and Forman Avenue, with minimal investment required to extend the circuits. We also understand that the closest Hydro One circuits are on Quinlan Road (Perth Line 36) approximately 500m across private property and on O'Loane Avenue (Road 122) approximately 450m across private property.

While this property currently lies outside of Festival Hydro's licensed service area, we understand that Festival Hydro can apply to the Ontario Energy Board to amend their service area to include this parcel. We support Festival Hydro's application to become the licensed distributor for this development as their closer proximity will mean a lower cost to our client, and it makes logical sense to use as much existing electrical infrastructure as possible.

We anticipate development of this property to begin shortly and request that Festival Hydro take the necessary steps to become the distributor for this development as soon as possible. Please let me know if I can be of further assistance.

Yours truly,
Northwest Stratford (2009) Developments Inc.



D. Tennant, Jr.

c: Mr. R. Stratford, RWS Consulting Inc.

APPENDIX F

LETTER FROM HYDRO ONE TO FESTIVAL

Hydro One Networks Inc.

8th Floor, South Tower
483 Bay Street
Toronto, Ontario M5G 2P5
www.HydroOne.com

Tel: (416) 345-5707
Fax: (416) 345-5866
Andrew.skalski@HydroOne.com

Andrew Skalski

Director – Major Projects and Partnerships
Regulatory Affairs



BY COURIER

April 4, 2012

Jac Vanderbaan, P.Eng., CMA
Chief Operating Officer
Festival Hydro Inc.

Dear Mr. Vanderbaan:

Festival Hydro Inc. Application for a Licence Amendment – Hydro One Networks' Letter of Consent

This is to confirm that Hydro One Networks Inc. ("Hydro One") supports your application to amend Festival Hydro Inc.'s Distribution Licence as proposed in your pending service area amendment application regarding the property noted below. Hydro One would support a request to proceed with this service area amendment without a hearing.

Subject Property

Part of Lots 3 & 4 and all of blocks S, U & V, Concession 2 (Geographic Township of Ellice), Registered Plan No. 11, City of Stratford, County of Perth

Sincerely,

A handwritten signature in black ink, appearing to read "A. Skalski". The signature is fluid and cursive, with the first letter of the last name being a large, stylized capital 'S'.

Andrew Skalski

APPENDIX G

IMPACTS TO HYDRO ONE LICENCE

Hydro One Networks Inc. - Dx Licence –

Appendix B – Tab 4

Name of Municipality:	Township of Perth East
Formerly Known As:	Township of Mornington, Township of Ellice, Township of North Easthope, Township of South Easthope, Village of Milverton, as at December 31, 1997.

Area Not Served By Networks:	The area served by Festival Hydro Inc. as more particularly set out in Licence No. ED-2002-0513
-------------------------------------	--

Networks assets within area not served by Networks:	Yes
--	-----

Customer(s) within area not served by Networks:	No
--	----

*→ Upon approval of this application, remove Township of Perth East from Tab 1 and
add to Tab 4*

Name of Municipality:	City of Stratford
Formerly Known As:	Same

Area Not Served By Networks:	The area served by Festival Hydro Inc. described as more particularly set out in Licence No. ED-2002- 0513.
-------------------------------------	---

Networks assets within area not served by Networks:	No
--	----

Customer(s) within area not served by Networks:	No
--	----

→ Upon approval of this application, this will be added