`LORI BRYENTON - INTERROGATORY #1

Interrogatory

References

None

Preamble

None

Questions / Requests

As per Exhibit B, Tab 1, Schedule 1, p. 4 of 7, item 11, the Applicant admits to the lack of a signed agreement with the County of Dufferin concerning the request for an easement along the rail corridor. An incomplete and unconfirmed transmission route is a cause for concern as alterations to that route may result in affects to the quality and reliability of electricity to consumers. We request a copy of the finalized and signed agreement.

Response

As indicated in response to Board Staff IR #11(v), the proposed easement with the County of Dufferin has not yet been finalized. The Applicant does not agree with the intervenor's characterization of the route as being "incomplete and unconfirmed" and further does not agree that the fact that the easement with the County remains pending may affect the quality or reliability of electricity to consumers. See responses to CORE IR #1 and CORE IR #12(e).

LORI BRYENTON - INTERROGATORY #2

Interrogatory

References

None

Preamble

None

Questions / Requests

As per Exhibit B, Tab 1, Schedule 1, p. 4 of 7, item 11, the Applicant refers to private lands that are required for the Transmission Line, admitting that not all easements or leases have been acquired, referring to 'a few minor exceptions'. We disagree with the term 'minor', as any gap in a transmission route will most certainly affect the ability to provide reliable electricity to consumers. We request proof that these private land owners have signed leases or easements, and maps showing the exact locations of these parcels.

Response

The current status of negotiations with all landowners is provided in response to Board Staff IR #11(v). Chapter 4 of the Board's Filing Requirements for Transmission and Distribution Applications does not require the Applicant to file copies of signed leases or easements. Rather, pursuant to Section 97 of the Ontario Energy Board Act, the Applicant must obtain approval for the forms of agreements that it has offered and that it intends to offer to each affected land owner.

As indicated in response to CORE IR #1 and CORE IR #12(e), it is not necessary for all easements or other land rights to be finalized prior to the granting of leave to construct. The absence of a final easement will not result in a "gap" in the route that will prevent the delivery of electricity from the Wind Farm to the IESO-controlled grid (Note: the Applicant will not be delivering electricity to consumers). This is because, in accordance with the typical Conditions of Approval issued by the Board in granting leave to construct pursuant to Section 92 of the Ontario Energy Board Act, DWPI will be required to obtain all necessary easement rights required to construct, operate and maintain the proposed transmission facilities.

A map showing the locations of parcels for which land rights have not yet been secured is provided in Appendix A.

LORI BRYENTON - INTERROGATORY #3

Interrogatory

References

None

Preamble

None

Questions / Requests

As per Exhibit B, Tab 2, Schedule 1, p. 3 of 5, items 24, 25 and 26, the Applicant refers to the lack of secured transmission easements or leases for two properties along the Transmission Line. We request copies of signed agreements for these properties.

Response

See response to Lori Bryenton IR #2.

LORI BRYENTON - INTERROGATORY #4

Interrogatory

References

None

Preamble

None

Questions / Requests

As per Exhibit B, Tab 4, Schedule 1, p. 2 of 9, item 20 a), the Applicant attempts to convince the Board and all readers of this application that the 230kv option has more community support than the 69kv option, mentioning local officials and residents. We find this conclusion unfounded, as the Township of Melancthon has asked for a moratorium on any further IWT's, Amaranth Township has submitted written objections to the 230kv power line option, The Town of Shelburne has submitted written objections, over 300 residents of the Town of Shelburne have signed a petition objecting to the 230kv power line option, analysis of the recorded versions of PIC's held by the Applicant will indicate a majority of those in attendance were against this project and its associated transmission facilities, and numerous rural residents and those living alongside the rail corridor have published written objections in local newspapers. As the aforementioned evidence suggests extremely weak support for the 230kv power line option, we request that the Applicant provide comprehensive proof in a statistical nature of community support.

Response

See response to CORE IR #5(b).

LORI BRYENTON - INTERROGATORY #5

Interrogatory

References

None

Preamble

None

Questions / Requests

In Exhibit B, Tab 4, Schedule 1, p. 2 and 3 of 9, item 25 b), the Applicant claims that relative to the 69kv alternative, the Proposed Project will have a low visual impact. The fact that the 69kv route is shorter (36 km) and would have required fewer poles as compared to the 230kv route at 47 km is contradictory to the Applicant's statement. The poles proposed for the 69kv route would have been only 70-80 ft. tall as compared to poles ranging in height from 80-100 ft. for the proposed route. Taller poles mean more visual impact. Please provide documentation supporting the Applicant's position. *In the Applicant's REA May 2012, Draft Construction Plan Report, p. 17, Section 4.5, the Applicant discusses the 69kv Option, its preferred route at the time. This document describes the installation of only 54 wooden poles spaced 50-55 m apart along 2.77 km of municipal road allowance. The remainder of the route would be shared with Hydro One. The Applicant has altered those numbers in their Leave to Construct application to 850 replacement poles spaced 45 m apart. [Exhibit B, Tab 4, Schedule 1, p. 3 of 9, item ii)]. This drastically different description contradicts the Applicant's own previous documents. This appears to be an attempt to influence the reader in a misleading way to reject the 69kv option, thereby accepting the 230kv option. We request that the Applicant retract all areas of the application that contradict the statements made by the Applicant when they previously preferred the 69kv alternative.

Response

See response to Board Staff IR #7(ii). In addition, to clarify, please note that while the 69 kV alternative (if feasible) would have required approximately 50 new poles to be installed along portions of that route where no existing Hydro One structures are in place, the 69 kV alternative would have also required approximately 800 replacement poles, the installation of which would have required the removal of existing distribution poles and installation of taller replacement poles.

LORI BRYENTON - INTERROGATORY #6

Interrogatory

References

None

Preamble

None

Questions / Requests

As per Exhibit B, Tab 4, Schedule 1, p. 3 of 9, item iii), in regards to joint use with Hydro One for the 69kv option, our clients disagree that this would be a negative. Hydro One already has existing qualified personnel and equipment to maintain and oversee the facilities. In the Applicant's REA May 2012, Draft Design and Operations Report, p. 14 , the Applicant states that the 69kv route 'was chosen based on discussions with Hydro One and the results of natural heritage studies that were undertaken along various possible routes to determine the route with the least environmental impact.' The Applicant is again contradicting its own documented statements. Please provide documentation supporting this reversal.

Response

See responses to Board Staff IR #7(i) regarding joint use and (ii) for a comparison between the 69 kV alternative and the proposed transmission facilities. See also response to CORE IR #8.

LORI BRYENTON - INTERROGATORY #7

Interrogatory

References

None

Preamble

None

Questions / Requests

As per Exhibit B, Tab 4, Schedule 1, p. 4 of 9, item e), the Applicant claims reduced line losses with the 230kv route as compared to the 69kv alternative. We request data from the Applicant that discusses the line losses accumulated over the 47 km length of transmission line, as compared to the 36 km length of the alternative. A shorter route, with shared support from Hydro One would ensure quality and reliability of electricity for consumers.

Response

The reason transmission voltages are higher is to reduce current flow through the conductors, which in turn reduces losses. Therefore, even if the route is physically longer, with the increase in voltage from 69 kV to 230 kV the losses are still reduced. Please see the row 1 of the table provided in response to Board Staff IR #7(ii).

LORI BRYENTON - INTERROGATORY #8

Interrogatory

References

None

Preamble

None

Questions / Requests

As per Exhibit B, Tab 4, Schedule 1, p. 5 of 9, item f), the Applicant claims the proposed transmission line represents an appropriate use for the Rail Corridor, which has historically been used for industrial purposes. We disagree with this statement, as the Town of Shelburne's planning indicates recreational use, and since the rail corridor's abandonment for rail use, it has been used for snowmobiling, hiking, skiing, horseback riding, etc. We request that the Applicant provide documentation of 'industrial purposes', aside from that of trains, in the past.

Response

The historical industrial use referred to in the referenced portion of the pre-filed evidence was, in fact, the use of the rail corridor for an active railway. The Applicant has no documentation of other industrial uses of the relevant lands in the past. However, the Applicant notes that presence of an active railway would most likely have precluded other industrial activities from being carried out along this strip of land during the lengthy period that the railway was active and until the rail line was removed.

LORI BRYENTON - INTERROGATORY #9

Interrogatory

References

None

Preamble

None

Questions / Requests

As per Exhibit B, Tab 4, Schedule 1, p. 5 of 9, item g), the Applicant states that fewer municipalities would be affected by the proposed route, yet the 69kv route would have avoided the Town of Shelburne completely. With more residents affected within an urban area, we request that the Applicant address the Town of Shelburne's written objection.

Response

The Town of Shelburne raises five concerns in its letter of comment. In response to the first concern, DWPI notes that it has provided a thorough explanation of its reasons for selecting the proposed transmission project in Exhibit B, Tab 4, Schedule 1, as well as in response to various interrogatories, including Board Staff IR #7. In response to the second concern, DWPI notes that it did explore to a very significant extent the possibility of the 69 kV alternative, which would have involved joint use along existing Hydro One distribution lines but, as described in response to Board Staff IR #7, this was ultimately found to not be feasible in light of Hydro One's joint use policy. Moreover, as described in response to CORE IR #7, planning considerations are not applicable to the present Application. In response to the third concern, DWPI notes that the proposed project is not required to conform with the Town's Official Plan (See response to CORE IR #7). In response to the fourth concern, please see responses to CORE IR #10 and Board Staff IR #12(ii).

With respect to the fifth concern, in recognition of the relatively high concentration of residents and close proximity of buildings along the portion of the proposed transmission line that runs through the Town of Shelburne, DWPI has committed to installing its transmission line underground through the built-up section of the Town. In the Applicant's view, this commitment effectively addresses all key concerns that have been raised by residents in this area. While the project will result in some short term construction disturbance related effects, once installed, the line would have no appreciable effects on the community and adjacent residents.

LORI BRYENTON - INTERROGATORY #10

Interrogatory

References

None

Preamble

None

Questions / Requests

As per Exhibit B, Tab 4, Schedule 1, p. 6 of 9, items 14-21, the Applicant admits that the 69kv route would have been shorter, would have required land rights from fewer private land owners, but would have had a high visual impact, and had only weak support from the community. The proposed 230kv route has only weak support from the community (mainly from those who stand to gain financially from the project), uses even taller poles thus having a higher visual impact, requires land rights from more private land owners, and is longer. These factors indicate that this proposed route has many detriments that will negatively affect the community.
*At the PIC's held by the Applicant, a photographic depiction of the 69kv power line portrayed only a minimal difference compared to its current state with the existing Hydro One line, which contradicts the Applicant's negative description (at lines 19 & 20) in the application. Please provide any further documentation to support the Applicant's reversal of position.

Response

See response to CORE IR #12(a). In addition, DWPI notes that while the 69 kV alternative would have run along municipal ROWs and would therefore require land rights from fewer private land owners, much of that route would have run directly in front of residential properties. The visual impact to the residents of the dual 69kV power line option would have been substantial. Moreover, the spacing of the 230 kV line poles, their generally more remote location, the smaller number of conductors and the underground installation through the most heavily populated area of the route in the Town of Shelburne are all factors that will contribute to the lower impact on the community of the proposed transmission project relative to the 69 kV alternative.

LORI BRYENTON - INTERROGATORY #11

Interrogatory

References

None

Preamble

None

Questions / Requests

As per Exhibit B, Tab 4, Schedule 1, p. 7 of 9, items 22 & 23, the Applicant claims to have rejected Alternative #2 'because it would have impacted multiple residences and wetland areas and would have increased the length of the route.' The proposed 230kv route has increased the length of the route and impacts multiple residences and wetland areas, as indicated in the maps. We request that the Applicant provide data on the actual number of residences affected and the square meters of wetlands affected as comparisons between the proposed 230kv route, Alternative Route #2, and the 69kv route.

Response

The consideration of environmental aspects, such as impacts on wetland areas, is beyond the scope of this proceeding (See response to Board Staff IR #12(ii)). It is not clear from the request as to the meaning of "affected" in reference to a residence and, moreover, the Applicant does not have information readily available to it on the numbers of residences along the various routes.

LORI BRYENTON - INTERROGATORY #12

Interrogatory

References

None

Preamble

None

Questions / Requests

As per Exhibit D, Tab 1, Schedule 1, p. 4 of 7, item 3, the Applicant states that a combination of wood and steel poles will be used along the rail corridor. In all PIC's and all newspaper advertisements describing the project, the Applicant has repeatedly stated that the transmission line would consist of 'single wood pole construction', no mention of steel poles. The actual construction of the components proposed can have an effect on the quality and reliability of electricity to consumers, aside from such things as visual impact. In fairness to the public and all interested parties, we request that the Applicant re-issue advertisements that address this error.

Response

Preliminary plans presented early on in the project included the use of wood poles for the power transmission line. However, as more information became available, and as detailed design progressed, it was determined that some steel poles would also be required in order to maintain tension along the line. The majority of the poles, however, are proposed to be wood. The use of both wood and steel poles was confirmed during the PICs held on October 22, 23 and 24, 2012, where it was specifically stated that "single wood poles with some steel poles will be used." Discussions with the public relating to the potential use of some steel poles were also held during earlier PICs and is recorded in transcripts. Please see enclosed transcript excerpt from the July 2012 Public Information Centres and a Public Information Panel from the October 2012 Public Information Centres at Appendices B and C.

LORI BRYENTON - INTERROGATORY #13

Interrogatory

References

None

Preamble

None

Questions / Requests

As per Exhibit E, Tab 1, Schedule 1, p. 1 of 2, we request that the Applicant provide documentation of permits to store hazardous waste, approvals from the county and township for a septic system in the O & M building and permission to have 15 full and part-time employees, and township and county approval for industrial operations to take place at this currently agricultural site.

Response

This request is not relevant to the Application. The Board is not being asked to approve construction of the O&M building. The Applicant will comply with all applicable permitting and regulatory requirements in respect of the O&M building and the activities it will carry out therein.

LORI BRYENTON - INTERROGATORY #14

Interrogatory

References

None

Preamble

None

Questions / Requests

Exhibit E, Tab 1, Schedule 1, p. 2 of 2, item 8, the Applicant states its intention to establish an emergency response plan. We request that the Applicant provide this plan, in detail, including an identification of the first responders that would be called and their agreement to accept such a call, response times involved, and written qualifications of all individuals involved in the emergency response.

Response

The emergency response plan can be found in Section 9 of DWPI's August, 2012 Design and Operations Report (http://www.dufferinwindpower.ca/ReportsStudies.aspx). The Emergency Response Plan is also available at Dufferin County and local municipality offices within the REA application package kept on record at these offices. The Emergency Response Plan will be updated following completion of final permitting and the interconnection process, at which time DWPI will coordinate with Hydro One, local first responders and other stakeholders to create an updated Emergency Response Plan based upon the project's approved design and the Transmission Project's route.

LORI BRYENTON - INTERROGATORY #15

Interrogatory

References

None

Preamble

None

Questions / Requests

As per Exhibit E, Tab 2, Schedule 1, p. 3 of 8, items 20 & 21, it is stated that the transmission lines are not to exceed 50 km (pursuant to O. Reg. 160/99, Electricity Act). As the Applicant has repeatedly throughout the application referred to a length of 'approximately 47 km', we request that the Applicant provide the line route maps, with exact distances in meters for each section, in a verifiable format.

Response

See response to CORE IR #11(a).

LORI BRYENTON - INTERROGATORY #16

Interrogatory

References

None

Preamble

None

Questions / Requests

As per the System Impact Assessment Report, entitled Hydro One, second paragraph, 'The short circuit and thermal loading levels have been computed based on information available at the time of the study. These levels may be higher or lower if the connection information changes as a result of , but not limited to, subsequent design modifications or when more accurate test measurement data is available.' We request that this missing data be provided and a revised study be submitted for review. This study may affect the quality and reliability to electricity consumers.

This study does not address the short circuit or thermal loading impact of the proposed facilities on load and generation customers. We request that the Applicant provide this missing assessment.

Paragraph 6 states that 'additional facility studies may be necessary to confirm constructability and the time required for construction.' We request that the Board deny granting a Leave to Construct with the absence of such studies indicated by Hydro One.

Response

These studies will be completed as part of the final design. Upon their completion they will be submitted to the IESO rather than to Hydro One as it is the IESO that issued the SIA.

LORI BRYENTON - INTERROGATORY #17

Interrogatory

References

None

Preamble

None

Questions / Requests

As per the System Impact Assessment Report, Study Findings, item 1), we request proof of how the Applicant plans to mitigate the potential for unacceptable back-feed through the T4 transformer via the low voltage bus. Should this circumstance arise, there is potential for negative impact regarding the reliability of electricity for consumers.

Response

As per the Specific Requirements (2) (ii) in the SIA Final Addendum Report provided in Exhibit H, Tab 2, Schedule 2, Appendix A, DWPI will participate in a new SPS which would reject the project's output to prevent back-feed through the T4 transformer via the low voltage bus.

LORI BRYENTON - INTERROGATORY #18

Interrogatory

References

None

Preamble

None

Questions / Requests

As per the System Impact Report, Protection Impact Assessment, Telecommunications Requirements, we request that the Applicant provide documentation of how they will establish communications between the project and the Orangeville TS, Essa TS, dual communication link to transmit protection signals among all stations, including Everett TS and Alliston TS. This documentation should include manufacturer names and availability of all technical equipment necessary.

We request that the Applicant provide a response to the PIA's proposed changes to transmission configuration, protection hardware, protection settings, and telecommunications. These issues may affect the quality and reliability of electricity to consumers.

Response

All protection modifications and settings are approved by Hydro One as part of its responsibility as a licensed transmitter to protect the quality and reliability of electricity service for consumers.

LORI BRYENTON - INTERROGATORY #19

Interrogatory

References

None

Preamble

None

Questions / Requests

As per System Impact Studies, 6.3 Thermal Analysis, there is a stated potential for increased flow east on the Essa-by-Orangeville line, impacted by Dufferin Wind Farm. As this could affect the quality and reliability of electricity to consumers, we request that the Applicant provide mitigation measures.

Response

The mitigation measures for the increased flow east on Essa by Orangeville line will be determined by IESO and/or HONI.

LORI BRYENTON - INTERROGATORY #20

Interrogatory

References

None

Preamble

None

Questions / Requests

As per System Impact Assessment Report, p. 35, Table 28, we request that the Applicant provide a detailed test procedure by named and qualified personnel that will comply with the IESO's concerns regarding WTG's trip for out of zone faults.

Response

Once the project is connected and incorporated to IESO-controlled grid, the IESO will monitor the wind farm on a 24/7 basis. If the wind turbine generators trip for out of zone faults, it will be identified by the IESO's monitoring system automatically. To demonstrate voltage ride-through capability, DWPI will provide the IESO with the test results for both the GE 1.6 MW and 2.75 MW turbine models during commissioning of the wind farm.

LORI BRYENTON - INTERROGATORY #21

Interrogatory

References

None

Preamble

None

Questions / Requests

As per Protection Impact Assessment, p. 3 of 3, Executive Summary, proposes changes to be made. We request that the Applicant provide evidence of an active response to this directive.

Dufferin Wind Power Inc. Responsibilities section lists several items the Applicant must provide. We request the Applicant's response including details regarding mitigation plans, qualified companies involved, response time, equipment provider, purchase dates. Compliance by the Applicant may affect the quality and reliability of electricity to consumers.

Response

The reference appears to be incorrect. The Applicant assumes that the intended reference is to the SIA, p. 4, "IESO Requirements for Connection". On this assumption, the Applicant responds as follows:

1. Concerning MVAr compensation requirements: It is typical for stations of this type to require equipment facilitating the requirements set forth in the SIA. There can be no connection unless these requirements are satisfied or otherwise technically dispositioned such that there are no adverse effects on system reliability to the IESO's satisfaction. The specifications for the required equipment will be developed by the balance of plant contractor during final design and prior to procurement.

2. Concerning items (i) and (ii), both are controls requirements that will be incorporated in the final design.

The SIA is a critical input to the design engineer and it is a requirement to adhere to the SIA to obtain a connection.

LORI BRYENTON - INTERROGATORY #22

Interrogatory

References

None

Preamble

None

Questions / Requests

As per PIA, p. 4, 2.0 Power Systems Analysis, a., Short Circuit Studies, mentions the unavailability of some of the data. We request that the Applicant make this data available, that the study be re-done accurately with this data, and the results be provided. This affects the quality and reliability of electricity to consumers.

Response

The reference is incorrect. We assume that the correct reference is to the CIA rather than to the PIA, at p. 4, Section 2.0. On January 15, 2013, by way of a telephone call with the Hydro One employee responsible for preparing the CIA report, the Applicant received clarification that because Customer Impact Assessments are always carried out while the connection applicant's project is under development and has not been installed, Hydro One always adds such a general statement in the CIA. For the DWPI project, the Hydro One employee indicated that typical values were used and, in his view, these were sufficiently accurate for the CIA and, as such, the study does not need to be re-performed.

LORI BRYENTON - INTERROGATORY #23

Interrogatory

References

None

Preamble

None

Questions / Requests

As per CIA, p. 8, 3.1 Preliminary Outage Impact Assessment, we request that this schedule be made available now, with detailed engineering. This information must be known prior to a Leave to Construct being granted as this affects the quality and reliability of electricity to consumers. We request that the Applicant provide the fault level reviews mentioned under the heading 'Conclusions and Recommendations'.

Response

The CIA is referring here to an outage by Hydro One and not by DWPI. The IESO will, upon request from Hydro One, decide how and when an outage may be carried out so as to enable a tap connection for DWPI's Switching Station.

LORI BRYENTON - INTERROGATORY #24

Interrogatory

References

None

Preamble

None

Questions / Requests

We request that it be noted by the Board that in recent statements made by John Boldt, Commercial Agreements Manager, Business Integration, Hydro One Networks Inc., Hydro One notes 'the potential for increased lightning strikes with taller poles rises, thereby increasing the chance of pole fires, equipment damage and outages' to consumers.

Response

Although this request is not directed to the Applicant, the statement is misleading and requires clarification.

Although the source and context of the statement being attributed to Mr. Boldt are not provided, we note that the referenced statement is identical to a statement used by Mr. Boldt on p. 2 of the letter filed by the Applicant as part of its response to Board Staff IR #7(i). In this letter, the context of the statement is clear. Mr. Boldt explains Hydro One's rationale for not allowing high voltage transmission lines on existing distribution poles that already carry low voltage distribution lines. Mr. Boldt explains that there are technical risks of running high voltage lines in parallel above lower voltage lines along the same poles due to the potential for contact, which would potentially lead to significant equipment damage, large-scale service disruptions and lengthy restoration times. Mr. Boldt explains that a potential solution to the risk of contact is to invest in much taller poles that would provide for the necessary separation between the high voltage and low voltage lines, but that this would only reduce and not eliminate the risk of contact and, moreover, he states, "the potential of increased lightning strikes with taller poles also rises, thereby increasing the chance of pole fires, equipment damage and outages to HONI's ratepayers." This statement has no relevance whatsoever to the Applicant's proposed transmission facilities, which would not involve joint use or the potential for any such contact between low- and high-voltage lines. The Applicant also notes that although having taller distribution poles may increase the potential for lightning strikes relative to shorter distribution

poles, this is not relevant to the proposed transmission facilities. This is because whereas distribution lines do not typically have lightning protection, the proposed transmission facilities will have Optical Fiber Ground Wire (OPGW) at the top of the transmission circuit, which will substantially minimize the impact of lightning strikes on the system. Having OPGW is consistent with the requirements under the IESO Market Rules for transmission lines in Ontario.

LORI BRYENTON - INTERROGATORY #25

Interrogatory

References

None

Preamble

None

Questions / Requests

Hydro One also states that with respect to system reliability, poles higher than 80 ft. require the capability to mount a quick response for power restoration when storms occur, thus requiring special local equipment and manpower to be readily available. Hydro One does not commonly stock 100 ft. poles, nor special equipment such as cranes and large buckets, locally for this use. The cranes required to set poles of this size require roads to be blocked for periods of time. All of these considerations would increase restoration times. Hydro One has separate field staff supporting high versus low voltage systems. Not all lines personnel are trained to work on both voltages. (This document available upon request.) We request that the Applicant provide a detailed plan as to how they would mitigate pole fires, particularly in and around wetlands, portions of the transmission route not accessible by roads, support from the local police for road closures, a locally available and willing crane operator, and proof of all necessary equipment required.

Response

The source or context of the statements alleged to be made by Hydro One is not clear. The Applicant notes that some of the statements have some similarity to statements made on p. 2 of the letter filed in response to Board Staff IR #7(i). Regarding emergency response, please see response to Board Staff IR #4(vi).

LORI BRYENTON - INTERROGATORY #26

Interrogatory

References

None

Preamble

None

Questions / Requests

We hereby request that the Board take note of the fact that the Applicant has deliberately chosen a transmission route that uses taller poles and is a longer route, thereby increasing the risk of lightning strikes and pole fires and that this route will be wholly owned by the applicant with no shared portions with Hydro One, therefore no opportunity to share that utility's expert maintenance and safety and equipment reserves that would have mitigated many factors if the 69kv route had been chosen.

Response

This is argument and is not consistent with Rule 28.02(a) and (d) of the Board's Rules of Practice and Procedure. The Board should ignore this interrogatory #26.

LORI BRYENTON - INTERROGATORY #27

Interrogatory

References

None

Preamble

None

Questions / Requests

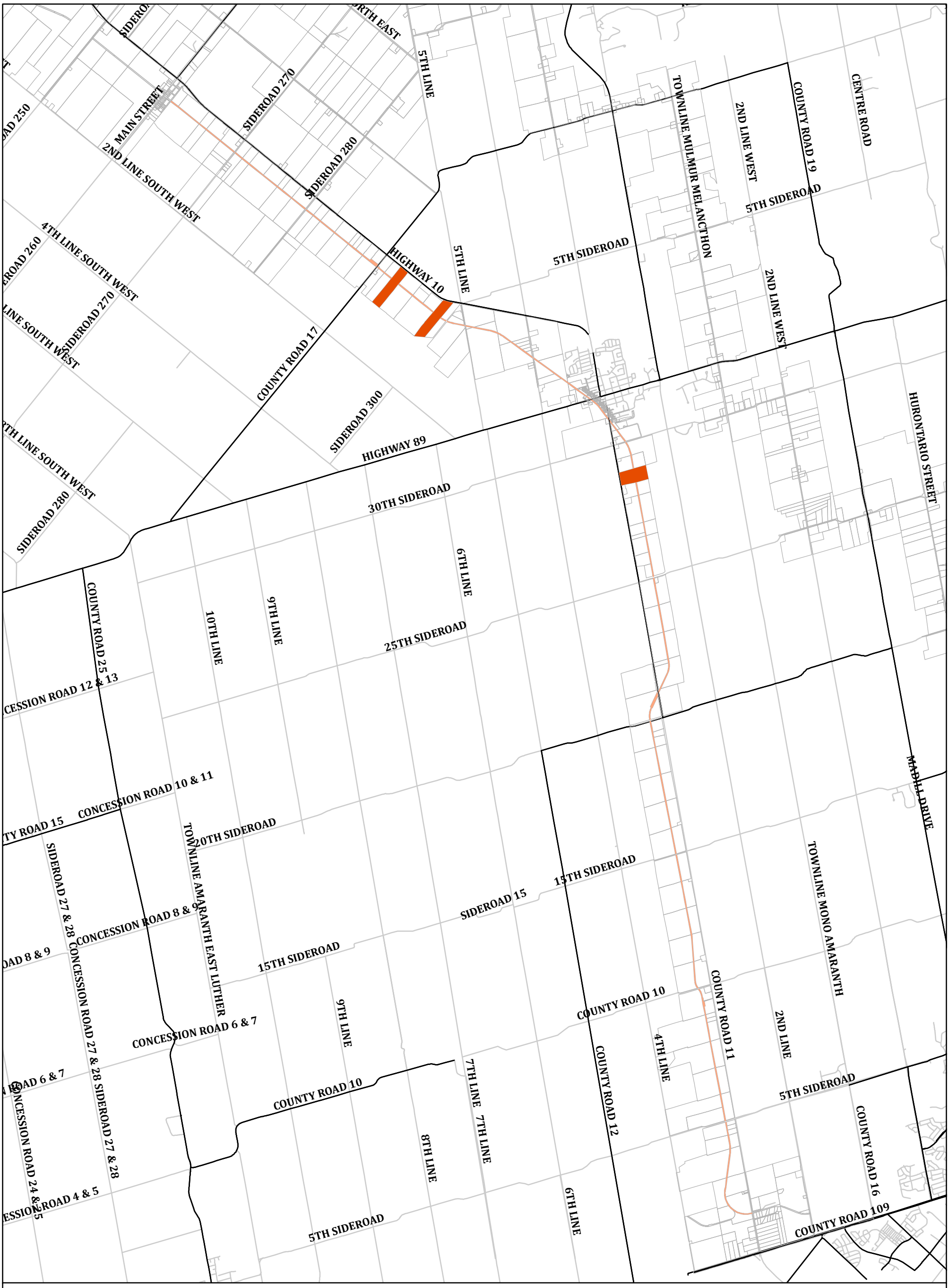
As the Applicant investigated and rejected 3 Alternative routes, and the current route has multiple problems as noted herein, we request that the Board deny approval of the Applicant's Leave to Construct Application.

Response

This is argument and is not consistent with Rule 28.02(a) and (d) of the Board's Rules of Practice and Procedure. The Board should ignore this interrogatory #27.

APPENDIX A

MAP OF UNSECURED EASEMENTS



Dufferin Wind Power Project
Lands Yet to be Secured Along 230 kV Line

Legend

- Lands Yet to be Secured
- Historical Title Defect
- Parcel
- Arterial Road
- Minor Road

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DILLON CONSULTING

Created By: SLP
Checked By: DR
Date Created: 112311
Date Modified: 101812
File Path: I:\GIS\115199 - Dufferin Wind\2012\Mapping\Lands Yet to be Securedmxd

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APPENDIX B

TRANSCRIPT EXCERPT FROM JULY 2012 PIC

Potential use of some steel poles mentioned by Jeff Hammond during second PIC held in Amaranth Township on July 25, 2012.

concerned about, relating to the other, or the first project that was up here in Melancthon, the Trans Alta Project. They put very, very large poles, monstrous poles, concrete steel, 40m apart, so it was like a big picket fence for I think it was 11km. And people really didn't like that, which is understandable. If you look at the pictures over here, what we're proposing to do is do a single wood pole. And that was one of the other advantages. The pole structure on the 69kV line was going to have two circuits, so six cables. Six wires. It was going to be quite top-heavy and it was going to be larger than what the poles that exist there today. People didn't want the view shed impact. So the difference between that is that we're going to putting one single wood pole then in some corners that may be guyed, or in one corner when it has to go around a corner, it may be a steel pole, but predominately they would be wood poles and they would be spaced 90 to 150m apart. We actually think about 150m is going to be the average. So what the means is, is that as we go through that area, we could put one pole and cross a span instead of going and doing directional drilling as disrupting the wetlands in front of it and in back where our drill bit goes in and goes out. Here again MNR makes those decisions. So if those rules change we still have to hit some pretty high hurdles for the MNR to even consider us doing it. And the reality is, is that we've got to move forward. Those rules may not change for a long time. And so we're tracking it, but at the same time we have to move the project forward, so that's where it stands right at the moment.

SHEILA WILLIS — Ok, Ma 'me. You've been waiting.

MEMBER OF PUBLIC — I'm just trying to understand how other than 'Not in my backyarders' (NIMBY's) how you got to option two when you have a virgin track versus where there is already lines on a roadway, I understand the stacking and all that. But like, that's virgin and you have to deal with all the people, and it might be easier in some ways, but more {inaudible} in others. But as far as, you know, if it's already there, yeah it's going to be a little bit bigger, but at least it's already there. And I also noticed that you keep using number one in the past tense, but it's still a viable option or is it still in the back?

JEFF HAMMOND — Ok, so let me answer the first question. Ok, so, How did we get to number two? It was driven by a lot of factors. It was driven by these meetings and it was driven by meetings with the councils. And everybody, not everybody..unfair…

MEMBER OF PUBLIC — But most of the townships affected there didn't like it, and now the railway is in Amaranth most, it seems to be Not in my backyarding all around.

JEFF HAMMOND — I'm not so sure…

MEMBER OF PUBLIC — Cause the an… Well the railway seems to run more through Amaranth and the option one seems to be more in the townships who are against option one.

JEFF HAMMOND — Oh, now I understand. Actually what happened was, was the 69kV line would run along the road and it would go about one kilometre in Amaranth right against one of the bigger residential developments that's going on. And so the

APPENDIX C

EXCERPT FROM OCTOBER 2012 PIC PANEL

230kV Power Line

- Single wood poles and some steel poles will be used
- Lattice towers will not be used
- Pole heights: Average height above ground will be 22.8m (75 ft.). Some poles will be higher to account for changes in topography
- Pole spacing: Approximately 100 m (328 ft.) depending upon final engineering
- Poles will be placed on the side of the rail corridor in order to support future rail operations and the continued use of the recreational trail

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