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February 22, 2013

Ms. Kirsten Walli, Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4

Dear Ms. Walli,

Re: EB-2011-0043 – Regional Infrastructure Planning

The following are the comments of Hydro Ottawa on the Draft Planning Process Working Group Report to the Board: the Process for Regional Infrastructure Planning in Ontario (“the Draft Report”).

- 1) The demand for distribution and transmission capacity of a region will be based upon the requirements identified by the Ontario Resource and Transmission Assessment Criteria (“ORTAC”). Hydro Ottawa believes that the working group should review the ORTAC requirements in order to ensure that these criteria are up to date and properly reflect the operational conditions within regions. Changes to the ORTAC may in fact change the demand for distribution and transmission capacity within a region.
- 2) Under section 3.8 of the report, the working group suggests that “Regional Infrastructure Plans that are submitted should include all of the potential solutions that were considered to demonstrate to the Board that an appropriate evaluation was carried out.” This section implies that all parties to the regional plan agree with the proposed solution. In the case where a distributor or transmitter does not agree with the proposed solution, and has chosen an alternative option, does the working group have a proposed process for dealing with such an event?
- 3) Under section 3.10 of the report, the working group suggests that the appropriate regulatory instruments of the Board be amended to: “Require transmitters to lead the regional infrastructure planning process given the Board’s expectation that the transmitter should lead the process.” Hydro Ottawa is supportive of the suggestion of the transmitter leading the process; however it is unclear who is responsible for ensuring that the outcomes of the regional plan are acted upon in a timely manner by the different parties.
- 4) Appendix 2 of the report addresses load forecasting. Hydro Ottawa has reviewed this section of the report and has concerns about the definition of the terms used in the report. Some examples



include the definition of “median weather conditions”, what is the definition of natural conservation versus additional energy efficiency, how is the forecast of extreme weather incorporated into the forecast and plans. In addition, who is the study lead (LDC, transmitter, OPA) and who has final sign off authority for the forecast especially if there is disagreement among the parties about the forecast.

- 5) Section 5 of the reports discusses other matters. The working group raises the potential issue of different Board panels reaching different conclusions and approval for a regional project. Hydro Ottawa would suggest that the working group propose a joint review process at the OEB (similar to a joint Leave to Construct application) for these plans which then are approved by one OEB panel. This approval would allow the different parties (LDCs and transmitters) to file their capital programs under a rate application in their normal cycle while knowing the regional project had been approved by the OEB and need only be incorporated into the rate application process.

Hydro Ottawa commends the working group on report that has been produced and hopefully the working group finds our comments helpfully in finalizing its report.

Yours truly,

Original signed P. Hoey

Patrick Hoey
Director, Regulatory Affairs