

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 Varna Wind Inc. for an order or orders pursuant to section 92 of the Ontario Energy Board Act, 1998 granting leave to construct transmission facilities in the Municipalities of Bluewater and Huron East.

REPLY TO MOTION TO STRIKE EVIDENCE

1. The Municipality of Bluewater (“Bluewater”), an intervenor in this proceeding, requests that the Ontario Energy Board (the “Board”) dismiss the motion brought by the Applicant, Varna Wind Inc., for an order striking the evidence filed by Bluewater.
2. The Applicant states that the evidence filed by Bluewater is beyond the scope of this proceeding and should either be struck or accorded little evidentiary weight.
3. It is the submission of Bluewater that the evidence it filed does, in fact, relate to the proceeding and is within the scope set out by the Board in Procedural Order No. 1.
4. In Procedural Order No. 1, the Board stated that “the interests of consumers with respect to prices and the reliability and quality of electricity service” would be considered in this proceeding.
5. As a municipal body, Bluewater seeks to represent the interests of its residents, who are themselves consumers of electricity. The evidence filed seeks to address issues that will have a direct impact on the quality and reliability of the electricity service provided to the residents of Bluewater.

Stray Voltage

6. The issue of stray voltage is a serious concern to residents of Bluewater and is a key factor in Bluewater's desire to see the transmission lines for the Applicant's project buried.
7. Bluewater submits that the issue of stray voltage is directly related to the quality of the electricity service the Board seeks to ensure.
8. In Bluewater's evidence, the impact of high-frequency transient spikes contributing to poor power quality was addressed.

Affidavit of Stephen McAuley, sworn March 27, 2013, Exhibit B, pp. 4-5.

9. If proper safeguards are not taken, wind turbines, such as those proposed by the Applicant, can generate ground current, otherwise known as stray voltage. This is generally a problem with power distribution once the energy leaves the turbine and enters the transmission lines.

Affidavit of Stephen McAuley, sworn March 27, 2013, Exhibit B, pp. 7-8.

10. Burying the collection line may not eliminate the ground voltage but can improve power quality, as demonstrated in Bluewater's filed evidence.

Affidavit of Stephen McAuley, sworn March 27, 2013, Exhibit B, p. 9, Fig. 6.

11. The evidence filed by Bluewater makes a number of recommendations as to how the quality of electricity can be improved to reduce or eliminate this issue, such as installing filters at all inverters before the power leaves the turbine and enters the transmission lines.

Affidavit of Stephen McAuley, sworn March 27, 2013, Exhibit B, p. 10.

12. The material filed by Bluewater relating to dairy cattle is directly relevant to these proceedings as it informs the Board regarding the effects poor quality electricity service

can have on rural residents whose livelihoods depend on their livestock. As a result, it is Bluewater's submission that every effort possible should be made to ensure the residents of Bluewater are not adversely affected by the installation of wind turbines and transmission lines that do not have appropriate measures taken to reduce or eliminate side-effects such as stray voltage.

Affidavit of Stephen McAuley, sworn March 27, 2013, Exhibit C.

Conclusion

13. By burying the transmission lines for this project, the quality of the electricity service provided by the Applicant can be improved through the reduction of stray voltage. This can only benefit consumers as they will receive a better quality service with fewer adverse side effects than if the transmission lines are allowed to be constructed above ground. The effects outlined above are directly relevant to the quality of the electricity the Applicant seeks to provide to the consumers of Ontario and as a result, it is Bluewater's submission that the evidence it filed is directly relevant to this proceeding and should be accorded full evidentiary weight by the Board in coming to its decision.

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