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Vice President and Chief Regulatory Officer
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BY COURIER

June 3, 2013

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

Dear Ms. Walli

**EB-2013-0040 & EB-2013-0041 – Bornish Wind LP, Kerwood Wind Inc., and Jericho Wind Inc.
Leave to Construct Electricity Transmission Lines and Related Facilities in Middlesex County –
Hydro One Networks Inc. Intervenor Evidence**

In accordance with the Board's Procedural Order 4, I am attaching two (2) paper copies of the Hydro One Networks' Intervenor Evidence in the above-mentioned proceeding.

An electronic copy of this notice has been filed using the Board's Regulatory Electronic Submission System.

Sincerely,

ORIGINAL SIGNED BY SUSAN FRANK

Susan Frank

c – Intervenors (Electronic Only)

**BORNISH WIND LP, KERWOOD WIND INC., JERICHO INC.
LEAVE TO CONSTRUCT TRANSMISSION FACILITIES
HYDRO ONE NETWORKS INC. EVIDENCE**

BACKGROUND

Bornish Wind, LP, Kerwood Wind, Inc. and Jericho Wind, (the “Co-owners”) have applied to the Board for leave to construct a transmission line and related facilities to connect the Bornish Wind Energy Centre (“BWEC”) to Hydro One’s transmission system. Kerwood Wind Inc. (“Kerwood”) has requested Board approval to construct a transmission line to connect the Adelaide Wind Energy Centre (“AWEC”) to Hydro One’s transmission system. The Bornish line will be located on a right of way in Middlesex County, on the opposite side of Kerwood Road, Elginfield Road and Nairn Road from Hydro One’s 4.8/8.24 kV distribution line for about 11 km. Similarly, the Kerwood line will be located on the opposite side of the right of way on Kerwood Road from Hydro One’s 4.8/8.24 kV distribution line for about 7 km. Over the total distance of 18 km, Hydro One Distribution (“Hydro One”) serves about 20 customers who reside on the opposite side of the road from Hydro One’s existing distribution line. The proposed transmission lines will therefore be located between Hydro One’s distribution lines and those customers. In order for Hydro One to serve these or future customers requiring an electrical connection along these routes, Hydro One distribution lines will have to cross the proposed transmission lines at several locations. Some work on these crossings will be required when the transmission lines are built, while other work may need to be performed later, as circumstances arise.

SUBMISSION

Hydro One, as the electricity distributor for the area, is required to connect new customers, provide upgrades and restore power to existing customers, and operate, maintain and repair its assets.

The co-existence and co-location of two licensed entities with electricity infrastructure on adjacent rights of way introduces new considerations to ensure safe, reliable and economic provision of customer service and supply. These include

- response times for trouble calls,
- protocols for emergency service coordination,
- asset placement and clearance standards
- access to infrastructure and to customers
- general coordination of operations
- information provision and exchange between the parties.

Provision of service to Hydro One customers who will lie on the other side of the proposed new transmission lines entails consideration of technical and operational issues, such as how to:

- perpendicularly cross transmission lines with distribution voltage lines when needed, while maintaining the required clearances between the lines,
- provide restoration and other services (such as asset maintenance), and
- address possible contact between high and low voltage wires.

Safety (of the public and employees of both companies), system reliability and service quality are primary considerations. Finding solutions which address these obligations in an economic manner is critical to Hydro One. In this application, however, only two issues require the Board's attention:

- cost responsibility for future new or upgraded electrical services that will need to be placed underground, to avoid overhead crossing of the transmission lines and
- the duration of the cost responsibility provisions between the generator and the distributor.

It is Hydro One's view that satisfactory resolution of these issues is a necessary prerequisite to the Board granting a Leave to Construct for the transmission lines, as these issues impact price, as well as the reliability and quality of electricity service to Hydro One's customers. For these reasons, these issues are also under review in another Leave to Construct application currently before the Board (EB-2012-0442).

CONCLUSION

Hydro One's interest in this proceeding, as stated earlier, is to ensure that Hydro One can continue to properly serve its customers in locations affected by the proposed transmission assets in a safe and reliable manner. A distributor's costs of accommodating a generator-transmitter's presence can be recovered from specific new and existing customers, from all distribution ratepayers, from the transmitter, or from a combination thereof. Hydro One notes that neither the Transmission System Code nor the Distribution System Code provides guidance on this issue and that there is no requirement for transmitters or transmission-connected generators such as Bornish and Kerwood to sign a connection agreement with Hydro One Distribution that would comprehensively address their impacts on the distribution system. In this case, Hydro One is optimistic that a mutual agreement will be reached between the parties. However, Hydro One respectfully submits that the Board may wish to consider the above-noted issues nonetheless, as distributors, their ratepayers and generation proponents would likely benefit from the added certainty that would result from the Board's general guidance on cost responsibility and service quality considerations that arise when the assets of one licensed entity affect those of another.