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Susan Frank

Vice President and Chief Regulatory Officer
Regulatory Affairs



BY COURIER

October 11, 2013

Ms. Kirsten Walli
Secretary
Ontario Energy Board
Suite 2700, 2300 Yonge Street
P.O. Box 2319
Toronto, ON.
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 – Final Submission of Hydro One Networks Inc.

In accordance with the Board's Procedural Order 10, I am attaching two (2) paper copies of Hydro One Distribution's submission in the above-mentioned proceeding.

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

Sincerely,

ORIGINAL SIGNED BY ODED HUBERT ON BEHALF OF SUSAN FRANK

Susan Frank

c - Interveners (Electronic Only)

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2 **BORNISH WIND LP, KERWOOD WIND INC., JERICHO INC.**
3 **LEAVE TO CONSTRUCT TRANSMISSION FACILITIES**
4 **HYDRO ONE NETWORKS INC. FINAL SUBMISSION**
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7 The interest of Hydro One Networks Inc. (“Hydro One”) in this Application has been to ensure
8 that its Distribution business can continue to safely and reliably serve its customers in locations
9 affected by the proposed transmission assets (that is, where Hydro One Distribution and the
10 Applicants share the municipal rights-of-way in Middlesex County). At the start of this
11 proceeding, Hydro One Distribution and the Applicants were progressing toward an agreement
12 on technical and operational issues, which would help ensure this outcome. Only two main
13 issues remained:

- 14
- 15 • cost responsibility for future new or upgraded distribution electrical services that will need to
16 be placed underground, to avoid overhead crossing of the transmission lines; and
 - 17 • the duration of the cost responsibility provisions between the Applicants and Hydro One
18 Distribution for such services.
- 19

20 On September 18, 2013, as stated by the Applicants in their Argument-in-Chief, Hydro One
21 Distribution and the Applicants executed agreements which address the parties’ issues respecting
22 coordination of work on their respective assets on the rights-of-way, emergency response
23 services and the allocation of incremental costs resulting from these arrangements.

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25 Although Hydro One’s concerns in this case are now addressed, similar issues will likely
26 continue to arise, as generators and other licensed entities seek to install infrastructure in the
27 vicinity of Hydro One’s assets or customers. Hydro One is hopeful that the parties will be able
28 to reach bilateral and mutually satisfactory arrangements in such situations, as was the case
29 between Hydro One and the Applicants. However, Hydro One continues to respectfully submit
30 that the Board may wish to consider the above-noted issues in future similar leave to construct
31 applications from generator-transmitters. Distributors, their ratepayers and generation
32 proponents would all benefit from the added certainty that would result from the Board’s general
33 guidance on cost responsibility and service quality considerations that arise when the assets of
34 one licensed entity affect those of another.