

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 wpd White Pines Wind Incorporated for an order or orders pursuant to section 92 of the Ontario Energy Board Act, 1998 granting leave to construct transmission facilities in Prince Edward County.

INTERROGATORIES OF GORDON GIBBINS

- 1) Mr. Gibbins is a property owner on Royal Road and as such is affected by both the proximity of the proposed substation and the transmission line.
 - a) How much of the line can/will be constructed underground along Royal Road and Maypul Layn? Please provide specifics of the exact location of any parts of the line that will not be constructed underground, if any.
 - b) If it is not possible to construct the entirety of the line underground, what mitigation measures will wpd take to ensure the neighbouring landowners such as Mr. Gibbins, are not impacted by the location of the poles?
 - c) Please explain in detail what measures wpd will take to ensure that any construction activity along the length of the transmission line does not affect Mr. Gibbins' use and enjoyment of his property.
 - d) Should wpd require the construction of vaults along the Royal Road/Maypul Layn section of the proposed transmission line, please provide additional information regarding the specific location of vaults, the construction work required to install vaults, and any and all potential impacts on neighbouring property owners, such as Mr. Gibbins, during their installation.

- e) Both transmission and collector lines are proposed to be laid along Maypul Layn. Please advise as to whether both lines will be buried in same trench?
 - f) The Stantec White Pines Wind Project Consultation Report “Project Response” states that “wpd is officially planning to bury the entire interconnection line underground within the multiple right-of-way with the exception of two bridge crossings. . .” Given the prevalence of limestone bedrock, please advise as to whether any detailed pre-construction feasibility study been done along the proposed transmission route?
 - g) Please provide confirmation of road allowances or alternatives along Maypul Layn, which is a forced road.
 - h) Please advise what plans, if any, will be implemented to protect individual ducts against accidental future dig-ins? Will there be a system of warning signs (“high-voltage buried cable”) along the Royal Road/Maypul Layn route and, if so, how many would be required and at what locations along the proposed route?
 - i) The decommissioning of the proposed transmission line will impact owners of land along the route such as Mr. Gibbins. What compensation will wpd ensure is available to owners of land affected by the decommissioning of the transmission line?
- 2) As a local property owner, Mr. Gibbins is concerned with the land acquisition agreement that forms part of this Application.
- a) Please provide a complete list of the easements that will be required from landowners along Royal Road/Maypul Layn in order to construct the transmission line according to the proposed route.

- 3) Mr. Gibbins is concerned with the lack of consultation with neighbouring property owners and the potentially serious impact on residences and other buildings, some of which have heritage designation, along the proposed route of the transmission line including those not subject to easements.
- a) Please explain what mitigation measures wpd will take for all residences and other buildings, some of which have heritage designation such as those located on Mr. Gibbins' property, the Royal Road Cheese Factory, 1112 Royal Road, and 1106 Royal Road, including those not subject to easements to ensure that they are not damaged in any way by the construction of the proposed transmission line given that many buildings are located 40 metres or less away from the centre of the proposed route. Attached as Appendix 1 is a chart listing the heritage buildings at issue.
- b) Please explain how wpd is prepared to compensate property owners such as Mr. Gibbins and other local property owners including Excultet Winery and Waring House, who may suffer damage to their property and/or buildings thereon during the course of the construction of the proposed transmission line.
- c) Please explain what measures wpd intends to put in place prior to construction of the proposed transmission line along Maypul Lane to ensure that no damage is caused to any of the heritage trees lining Maypul Lane, many of which are over a century old and whose root systems are more likely than not to be entwined under the road surface.
- d) Mr. Gibbins conducts his business from his property. In other words his home is his workplace. Please advise of any possible impacts on Mr. Gibbins' ability to conduct his business from his property. In addition, please advise of wpd's plans to address any inconvenience, impact on work performance and ability to carry out work and potential

loss of income resulting from the construction and/or operation of the proposed transmission line.

- e) Mr. Gibbins' concerns are not only in regards to the construction of the Transmission Line in front of his property but also construction of the electrical substation and additional structure for wpd staff and workers in the vicinity of his property.
- f) Wpd acknowledges that potential exists for interference with local utilities as follows:

WHITE PINES WIND PROJECT INTERCONNECTION LINE EFFECTS

ASSESSMENT - May 2013

Utilities

Construction and Decommissioning

- Potential exists for interference with local utilities.

Mitigation

- In the event that any unidentified utilities are damaged during construction or decommissioning, wpd will pay for repairs.

- 4) Mr. Gibbins is concerned with issues relating to the proximity of the substation to residential dwelling.
 - a) Please explain what steps wpd will take to ensure the proximity of residential dwellings, such as that of Mr. Gibbins, to the proposed location of the substation will not result in either harm to residents or the release of stray voltage that has been known to harm both persons and livestock.
- 5) Mr. Gibbins is concerned with issues relating to the quality and reliability of service.

- a) Throughout the summer months, particularly in July, the White Pines turbines will be drawing electricity off grid when there is no wind. How does wpd foresee this impacting the reliability and quality of electrical service to the residents of Royal Road and Maypul Layn?
- b) What plans if any to compensate property owners such as Mr. Gibbins for disruption in their property use for property damage that is caused by repairing underground transmission lines?
- c) What plans if any to compensate property owners such as Mr. Gibbins for disruption to service during construction?

Date: March 19, 2014

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