Consideration of the public interest with respect to the construction of Delete the current Heading and Insert in its stead the heading the work upon, under or over a highway, utility line or ditch.

"ISSUE #1: Proposed Route and Discussion of Alternatives"

1. Reference:

- (a) Exhibit B Tab 2 Schedule 1 p. 2 5. Description of the Project
- (b) Exhibit B Tab 2 Schedule 3 p.2 2. The Proposed Transmission **Facilities**
- (c) April 7 2014 Suncor letter **Objection to the County of Lambton** Request for an Oral Hearing

Preamble

At 1 (a) Suncor notes that the transmission lines will be located "entirely on private property".

At 1(b) Suncor states that the line travels "adjacent to and parallel to Thomson Line, Army Camp Road..." along the edge of the private land..." "...along the boundaries...".

At 1(c) Suncor states that "Suncor would move its poles a short distance to another location on the private lands".

Retain

Insert at the beginning of the Preamble

Filing Requirements

- The route of the line is critical because the Board will only provide leave to construct for a specific route. Any material deviations to the approved route following Board approval will invalidate the leave to construct.
- the Applicant provide its rationale for selecting the Proposed Project as opposed to any alternatives considered and
- the Applicant explain how the proposed project as opposed to alternatives is in the public interest, as defined by section 96(2) of the Act."

Question/request

Delete the first sentence as redundant to evidence already submitted. Delete the second sentence and substitute

Would Suncor please provide the evidence (business case)that supports its decision not to incorporate moving its poles to "another location" to accommodate County needs in the first place (in its Proposed Project)?

References

- (a) Exhibit B Tab 2 Schedule 1 p.3 para 8. Impact Assessments
- (b) Exhibit H Tab 2 Schedule 1 Disclaimers
- (c) Exhibit H Tab 2 Schedule 1 Inertia Emulation Capability

Questions/Requests

- i. Please request that the IESO discuss at which point the cumulative effect of wind energy transmission facility reliability issues and concerns will be deemed to have a significant adverse effect on grid operation.
- ii. Please request that HONI in its *Addendum: Customer Impact Assessment* at p.3 explain why it placed the Cedar Point Wind Project in the Township of Adelaide-Metcalfe in Middlesex County.
- iii. Please provide evidence to refute the assertion that the absence of inertia emulation capability in the Transmission Facility could result in a jittery grid, and a consequent potential loss of reliability and quality of electricity service.
- iv. Please require that Suncor demonstrate due diligence in meeting the many complex requirements caused by the location of the transmission facility as specified in the SIA and CIA reports by implementing the following:
- 1. Appoint an expert VP to oversee and be accountable and responsible for conducting annual in-house compliance reviews regarding the obtaining of all Transmission Facility permits and approvals and submit an Annual Compliance Report for public view and comment;
- 2. Charge the VP with primary responsibility for achieving due diligence with regard to implementation of wind turbine innovations, refurbishments, procurements that would stabilize reliability and quality of grid connection;
- 3. Develop and implement an inspection/investigation protocol to ensure that the transmission facilities do not compromise HONI reliability and quality performance indicators. The protocol must be developed in cooperation with HONI.
- 4. Commission an expert engineering consultant to annually assess Transmission Facility operation from a compliance/due diligence

retain

Questions/Requests Delete the original interrogatory and substitute the following:

- 1. Would Suncor please identify the reliability issues or concerns referenced in (b) above.
- 2. Given that Suncor has entered into evidence HONI *Addendum: Customer Impact Assessment* and at p.3 that document locates the Proposed Project in the Township of Adelaide-Metcalfe in Middlesex County, has Suncor confirmed the location of its Proposed Project with HONI?.
- 3. Would Suncor please provide its best estimate of when the Proposed Project's lack of inertia emulation capability will be corrected, and whether Suncor can mitigate any potential loss of reliability and quality of electricity service in the interim.
- 4. What system or protocol does Suncor have in place to demonstrate due diligence in meeting the many complex requirements caused by the location of the transmission facility as specified in the SIA and CIA reports? For example:
 - (a) Does Suncor have senior management oversee and be accountable and responsible for conducting in-house compliance reviews regarding the obtaining of all Transmission Facility permits and approvals?
 - (b) How does Suncor achieve due diligence with regard to implementation of wind turbine innovations, refurbishments, procurements that would stabilize reliability and quality of grid connection i.e. the function of inertia emulation control?
 - (c) Does Suncor have an inspection/investigation protocol to

Amendment Table for WAIT Supplemental Interrogatories EB 2014-0022

Original Evidentiary Record CSLC&WAIT-PW IR Suncor (20140416).	Revision to the Evidence as of June 10 2014
perspective having special regard to its impact on the price, reliability and quality of electricity service provided by HONI and the IESO. 5. Devise and implement quality performance indictors to assess the effectiveness of transmission facility maintenance procedures in mitigating the lack of inertia emulation capability and publish the results monthly.	ensure that the transmission facilities do not compromise HONI reliability and quality performance indicators?