

September 23, 2014

Ontario Energy Board  
Attn: Kirsten Walli, Board Secretary  
P Box 2319  
27<sup>th</sup> Floor  
2300 Yonge Street Toronto ON M4P 14

Dear Ms. Walli,

**RE: Reply Letter of Comment on EB-2014-0022**

**Suncor Energy Products Inc. (“Suncor”)  
Application for Leave to Construct Transmission Facilities  
in the Municipality of Lambton Shores, Lambton County, Ontario.**

Please accept this letter as my reply comment to **Suncor Response D St. Amand Ltr of Comment Correspondence 20140805** at EB 2014-0022.

**Issue #1** Modification of Route – thank you for your complete response and attaching the document you posted at EB-2014-0022.

**Issue #2** Landowner Agreements- thank you for the clarification regarding compliance with Ontario law. Would Suncor please make a copy of the policy available.

**Issue #3** Authority to construct Transmission Facilities - Suncor’s response focuses solely on the negotiations aspect. Although Suncor’s “Negotiations 101” primer was succinct, Suncor did not provide the information requested. **HONI Sub Suncor 20140910** notes:

Unlike licensed distributors and licensed transmitters that normally have already-established communication channels and working relationships between or among them, the operational considerations need to be clearly defined and addressed between Hydro One (Distribution business) and Suncor (a generator-transmitter) to ensure safe, reliable and economic provision of customer service and supply, **because there is no existing working relationship between the two entities.** (Commenter’s emphasis)

My comment was not directed at the negotiations process but rather at an exploration of corporate Suncor, an exploration triggered by HONI’s request for information regarding the principles, methodologies, communication processes that inform and guide its relationships with public agencies like HONI. Suncor did not respond to this part of the HONI submission.

Suncor notes that its “main contractor” is using the Adelaide ERCP document to tailor an agreement for this PTF. If the document you refer to as the Adelaide ERCP document is the Traffic Management Plan at [http://www.suncor.com/pdf/Adelaide\\_Traffic\\_Management\\_Plan.pdf](http://www.suncor.com/pdf/Adelaide_Traffic_Management_Plan.pdf), please confirm or provide instruction for finding the document you reference.

This reference to a main contractor suggests that Suncor Energy Products Inc (Suncor) has no in-house workforce. It appears, therefore, that Suncor is a management/administrative entity that contracts out all the actual construction work to perhaps one company that then completes the actual work using its own work force and as needed, sub-contractors. Please confirm If that is a correct assumption.

The Commenter requested information about how Suncor meets industry standard guaranteed response times or lead time requirements. However, given that the work is all contracted out the issue is really how Suncor provides for such matters when it enters into agreement with a main contractor or if this type of issue is at the discretion of the hired contractor. Please indicate whether Suncor has any in-house operational control over the construction plans or day to day activities at the Cedar Pont Wind Energy proposed transmission facilities site.

Suncor acknowledges that it retains ultimate responsibility for the Proposed Transmission Facilities. However, since Suncor contracts out all the work the issue is really how Suncor management personnel who have this ultimate responsibility assess contracted out work execution - communications management, site supervision, cost and schedule control, safety and emergency response management, materials management, spills containment protocol. Would it be reasonable for the Commenter to expect to see Suncor management evaluate contracted out work execution through drop by inspections, or does Suncor build in other criteria, for example, key performance indicators, milestones, bonuses for superior performance in its contracts. Please clarify Suncor’s role in dealing with conflicts between sub-contractors, the main contractor and public agencies like IESO and HONI and whether a direct line of communication would exist between a public agency and Suncor.

#### **Issue #4 (a) – PTF and IESO**

Again, Suncor did not provide a direct response. If the case is that Suncor delegates to the main contractor procurement of retrofits to the Siemens turbines ( including obtaining and installing when commercially available of inertia emulation control ), please confirm.

#### **Issue #4 (b) –PTF Operational Requirements**

4(b)1 If Suncor itself has no knowledge of which ESA Connection Assessment Approval (CAA) is needed - transmission facilities or distribution facilities – please confirm.

## 5.0 Other Issues Raised by Suncor's Response Comment

- 5.1 Please explain the statement "a letter of comment is not an additional interrogatory process and parties should not be able to try to use it as such".
- 5.2 Suncor characterized the commenter's issue related to inertia emulation control as a "complaint". The statement was not a complaint. The Commenter raised an evidence-based issue commonplace in discussions of the impact of renewables on grid stability and was asking if Suncor has any idea if and when this function would be available. If Suncor simply does not know, please confirm.
- 5.3 Please explain the final comment – i.e. relevance to my letter of comment:

Finally, Suncor notes that the issue of inertia emulation control was raised in WAIT-PW's Supplementary Interrogatories to Suncor on April 16, 2014, more than three months ago. Suncor objected to the question on the grounds that it should be directed to the IESO or HONI. The Board agreed and stated in Procedural Order No. 2 on May 16, 2014, at page 4, that the question was not properly directed to Suncor, and that since neither IESO nor HONI filed evidence in the proceeding, it would not be appropriate to require IESO or HONI to provide a response.

I trust that Suncor's further comments succeed in providing accurate and complete responses to the remaining outstanding issues and issue #5. Suncor has determined that it wants to be in my community for many, many years. All I want to know is what that presence may look like within the parameters of the issues raised.

Sincerely,

Doris St. Amand

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]