



Fogler, Rubinoﬀ LLP  
Lawyers

77 King Street West  
Suite 3000, PO Box 95  
TD Centre North Tower  
Toronto, ON M5K 1G8  
t: 416.864.9700 | f: 416.941.8852  
foglers.com

November 5, 2014

Reply To: Thomas Brett  
Direct Dial: 416.941.8861  
E-mail: tbrett@foglers.com  
Our File No. 134380

**VIA RESS, EMAIL AND COURIER**

Ontario Energy Board  
2300 Yonge Street  
Suite 2700  
Toronto Ontario  
M4P 1E4

Attention: Kirsten Walli,  
Board Secretary

Dear Ms. Walli:

**Re: Suncor Energy Products Inc. ("Suncor") – Section 81 Notice**

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Please find attached a Section 81 Notice from Suncor with respect to the pending construction of both a transmission system and a distribution system in Ontario, as part of its Cedar Point Wind Energy Project.

Yours truly,

**FOGLER, RUBINOFF LLP**

Thomas Brett  
TB/dd  
Encls.

cc: Chris Brett, Suncor (*via email*)  
Christopher Scott, Suncor (*via email*)  
Mark Kozak, Suncor (*via email*)

**Ontario Energy Board**

**Preliminary Filing Requirements**  
**For a Notice of Proposal under Sections 80 and 81**  
**Of the *Ontario Energy Board Act, 1998***

**INSTRUCTIONS:**

This form applies to all applicants who are providing a Notice of Proposal to the Ontario Energy Board (the "Board") under sections 80 and 81 of the *Ontario Energy Board Act, 1998* (the "Act"), including parties who are also, as part of the same transaction or project, applying for other orders of the Board such as orders under sections 86 and 92 of the Act.

The Board has established this form under section 13 of the Act. Please note that the Board may require information that is additional or supplementary to the information filed in this form and that the filing of the form does not preclude the applicant from filing additional or supplementary information.

**PART I: GENERAL MINIMUM FILING REQUIREMENTS**

All applicants must complete and file the information requested in Part I.

**1.1 Identification of the Parties**

**1.1.1 Applicant**

Name of Applicant Suncor Energy Products Inc.	File No: (Board Use Only)	
Address of Head Office 112-4111 Avenue S.W. Calgary, Alberta T2P 2V5	Telephone Number 403-296-8000	
	Facsimile Number 403-296-3030	
	E-mail Address info@suncor.com	
Name of Individual to Contact Chris Brett	Telephone Number (403) 296-7125	
	Facsimile Number (403) 724-3626	
	E-mail Address chbrett@suncor.com	

**1.1.2 Other Parties to the Transaction or Project***If more than one attach list*

Name of Other Party N/A	Board Use Only	
Address of Head Office	Telephone Number	
	Facsimile Number	
	E-mail Address	
Name of Individual to Contact	Telephone Number	
	Facsimile Number	
	E-mail Address	

**1.2 Relationship between Parties to the Transaction or Project**

1.2.1	Attach a list of the officers, directors and shareholders of each of the parties to the proposed transaction or project. See Attachment 1.	
1.2.2	Attach a corporate chart describing the relationship between each of the parties to the proposed transaction or project and each of their respective affiliates. See Attachment 2.	

### 1.3 Description of the Businesses of Each of the Parties

1.3.1	<p>Attach a description of the business of each of the parties to the proposed transaction or project, including each of their affiliates licenced under the OEB Act to operate in Ontario for the generation, transmission, distribution, wholesaling or retailing of electricity or providing goods and services to companies licenced under the OEB Act in Ontario ("Electricity Sector Affiliates").</p> <p>Suncor Energy Products Inc. ("Suncor" or the "applicant") is a company incorporated under the laws of Ontario and a wholly owned subsidiary of Suncor Energy Inc., a leading Canadian Energy Company. Suncor is a leading renewable energy developer/owner in Canada. Suncor holds an electricity generation licence (#EG-2007-0015). It owns and operates two wind power facilities in Ontario; the Kent Breeze Power Project (76 MW) and the Ripley Wind Power Project (50% ownership) (20 MW). Suncor is also developing two other wind power projects in Ontario, the 100 MW Cedar Point II Wind Energy Project ("Cedar Point Project") for which it has a section 92 application before the Board, and the 40 MW Adelaide Wind Power Project ("Adelaide Project"). The Adelaide Project was recently transferred from Suncor to the Suncor Adelaide Wind Power Project Limited Partnership ("Adelaide LP"), an affiliate of Suncor.</p> <p><u>Electricity Sector Affiliates – Adelaide LP</u></p> <p>Adelaide LP is a Limited Partnership established under the laws of Ontario to hold the generation and related distribution assets (gathering system) of the Adelaide Project. It holds minimal transmission assets. Adelaide LP has recently applied (EB-2014-0230) for an Electricity Generator Licence. Its sole business is the ownership and operation of the Adelaide Project.</p>	
1.3.2	<p>Attach a description of the geographic territory served by each of the parties to the proposed transaction or project, including each of their Electricity Sector Affiliates, if applicable, and the geographic location of all existing generation facilities.</p> <p>Suncor's Cedar Point Project will be in the County of Lambton. The Adelaide Project is in Middlesex County. The Kent Breeze Power Project and the Ripley Wind Power Project are both in the County of Kent. In all cases, the power generated by the projects flows into the IESO-controlled grid, and no particular service territory is served.</p>	
1.3.3	<p>Attach a breakdown of the annual sales (in C\$, and in MWh) as of the most recent fiscal year end of the existing generation output among the IESO Administered Markets ("IAM"), bilateral contracts, and local distribution companies.</p> <p>All sales are to the IESO-administered markets.</p> <p>Sales for year ending December 31, 2013 \$10,457,044 MWh for year ending December 31, 2013 265.274</p>	
1.3.4	<p>Attach a list identifying all relevant Board licences and approvals held by the parties to the proposed transaction or project and each of their Electricity Sector Affiliates, and any applications currently before the Board, or forthcoming. Please include all Board file numbers.</p> <p>Suncor: Electricity Generation Licence (EG-2007-0015) Leave to Construct Application before the Board (EB-2014-0022)</p> <p>Adelaide LP: Electricity Generation Licence. (EG-2014-0230) Application currently before the Board (EB-2014-0230)</p>	

**1.4 Current Competitive Characteristics of the Market**

<p>1.4.1</p>	<p>Describe the generation capacity (in MW), within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, prior to the completion of the proposed transaction or project.</p> <p>Suncor                                  96 MW</p>	
<p>1.4.2</p>	<p>Describe the generation market share based on actual MWh production as a percent of the Annual Primary Demand, within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, prior to completion of the proposed transaction or project.</p> <p>Suncor had 2013 production of 265.7 MWh, which represents .000265% of 2013 Ontario Primary Energy Demand of 140.7 TWh (IESO 2013 Annual Report, page 3).</p>	

**1.5 Description of the Proposed Transaction or Project and Impact on Competition - General**

<p>1.5.1</p>	<p>Attach a detailed description of the proposed transaction or project, including geographic locations of proposed new transmission or distribution systems, or new generation facilities.</p> <p>The Cedar Point Project consists of up to 46 Siemen SWT 2.3 – 113 MW wind turbine generators, for a total installed capacity of up to 100 MW, in the Town of Plympton-Wyoming, the Municipality of Lambton Shores, and Warwick Township, all within Lambton County. Electricity will be conveyed from the wind turbines to the Suncor transformer station, located in the Municipality of Lambton Shores, in Lambton County, through a 34.5 kV distribution (collection) system, and then stepped up to the 115 kV voltage of the transmission line. The collection system and the step-up transformer station will also be located in the County of Lambton. Suncor has applied to the OEB for leave to construct a 15 km long 115 kV transmission line, connecting its transformer station to the IESO-controlled grid, by way of NextEra's Jericho Wind Energy Centre substation. From the Jericho substation, the electricity will be conveyed through NextEra-owned transmission facilities to the Hydro One Grid. The NextEra facilities were granted Leave to Construct by the Board in EB-2013-0361 and EB-2013-0040. Suncor's transmission line will also be located in Lambton County.</p>	
<p>1.5.2</p>	<p>Describe the generation capacity (in MW), within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, after the completion of the proposed transaction or project.</p> <p>After the completion of the proposed Cedar Point generation project, the applicant's generation capacity in Ontario will be 196 MW, excluding the Adelaide Project. The applicant's affiliate, Adelaide LP, owns a 40 MW project which is being developed. It may or may not be in operation prior to the Cedar Point Project.</p>	
<p>1.5.3</p>	<p>Describe the generation market share based on anticipated MWh production as a percentage of the Annual Primary Demand, within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, after the completion of the proposed transaction or project.</p> <p>The applicant's anticipated total annual production after completion of the proposed project, together with its Adelaide LP affiliate) will be approximately .000501% of 2013 Ontario Annual Primary Demand.</p>	

1.5.4	<p>Attach a short description of the impact, if any, of the proposed transaction or project on competition. If there will be no impact on competition, please state the reasons. Cite specifically the impacts of the proposal on customer choice regarding generation, energy wholesalers, and energy retailers.</p> <p>The proposed project will make use of available capacity on the IESO-controlled grid and will have no impact on competition. The applicant will be supplying energy from the project pursuant to a power purchase agreement from the OPA. Moreover, the Cedar Point Project, including its related collection system and transmission facilities will be paid for by the applicant and not by ratepayers. The electricity generated by the project will flow directly to the IESO-controlled grid and will not impact customer choice regarding generation, wholesalers or retailers.</p>	
1.5.5	<p>Provide confirmation that the proposed transaction or project will have no impact on open access to the transmission or distribution system of the parties or their affiliates. If open access will be affected explain how and why.</p> <p>Confirmed.</p>	

#### 1.6 Other Information

1.6.1	<p>Attach confirmation that the parties to the proposed transaction or project are in compliance with all licence and code requirements, and will continue to be in compliance after completion of the proposed transaction or project.</p> <p>The applicant confirms that, to the best of its knowledge, it is in compliance with all licence and code requirements and that it will continue to be in compliance after completion of the proposed project.</p>	
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**PART II: SECTION 80 OF THE ACT—TRANSMITTERS AND DISTRIBUTORS ACQUIRING AN INTEREST IN GENERATORS OR CONSTRUCTING A GENERATION FACILITY**

All applicants filing a Notice of Proposal under section 80 of the Act must complete and file the information requested in Part II.

No application under section 80 required due to exemptions from section 80 notice requirements for transmitters and distributors in subsections 4.02(i)(d) and 4.01(i)(d), respectively, of Ontario Regulation 161/99.

**2.1 Effect on Competition**

2.1.2	Describe whether the proposed generation output will be primarily offered into the IAM, sold via bilateral contracts, or for own use.	
2.1.3	Provide a description of the generation including fuel source, technology used, maximum capacity output, typical number of hours of operation in a year, and peaking versus base-load character.	
2.1.4	Provide details on whether the generation facility is expected to sign a "must run" contract with the IESO.	
2.1.5	Provide details of whether the generation facility is expected to serve a "load pocket", or is likely to be "constrained on" due to transmission constraints.	

**2.2 System Reliability**

Section 2.2 must be completed by applicants who are claiming that the proposed transaction or project is required for system reliability under section 82(2)(b) of the Act.

2.2.1	Provide reasons why the proposal is required to maintain the reliability of the transmission or distribution system. Provide supporting studies.	
2.2.2	Discuss the effect of the proposal on the adequacy (ability of supply to meet demand) of supply in the relevant control area or distribution region, citing effects on capacity plus reserve levels in comparison to load forecasts.	
2.2.3	Discuss the effect of the proposal on the security (ability of supply to respond to system contingencies) of supply.	
2.2.4	Provide a copy of the IESO Preliminary System Impact Assessment Report, if completed, and the IESO Final System Impact Assessment Report, if completed. If the IESO is not conducting a System Impact Assessment Report, please explain.	

**PART III: SECTION 81 OF THE ACT—GENERATORS ACQUIRING AN INTEREST IN OR CONSTRUCTING A TRANSMISSION OR DISTRIBUTION SYSTEM**

All applicants filing a Notice of Proposal under section 81 of the Act must complete and file the information requested in Part III.

**3.1 Effect on Competition**

3.1.1	<p>Provide a description of the transmission or distribution system being acquired or constructed.</p> <p>Please see response to section 1.5.1 above.</p>	
3.1.2	<p>Provide details on whether the generation facilities owned by the acquiring company are or will be directly connected to the transmission or distribution system being acquired or constructed.</p> <p>The generation facilities being developed by the applicant will be directly connected to the applicant's proposed 34.8 kV proposed distribution (collection) system, which will link the individual wind turbines to the applicant's proposed 34.8 kV/115 kV step up transformer station which is the western terminus of the proposed 115 kV transmission line. The distribution (collection) system will be unlicensed.</p> <p>A 15 km 115 kV transmission line (unlicensed) will run from the transformer station to a switch which connects to unlicensed transmission facilities now being constructed by NextEra subsidiaries pursuant to Board decisions EB-2013-0040 and EB-2013-0361. This unlicensed transmission system will in turn be connected to Hydro One's high voltage transmission system at Hydro One's Evergreen Switching Station, which is now under construction.</p>	
3.1.3	<p>Provide details of whether the generation facility is expected to serve a "load pocket", or is likely to be "constrained on" due to transmission constraints.</p> <p>The Cedar Point Generation Project is not expected to serve a load pocket or to be "constrained on" due to transmission restraints.</p>	
3.1.4	<p>Provide details on whether the generation facilities are expected to sign a "must run" contract with the IESO.</p> <p>The Cedar Point II Generation Project is not expected to be a "must-run" facility.</p>	

**How to Contact the Ontario Energy Board**

The Ontario Energy Board is located

at: P.O. Box 2319  
2300 Yonge Street, Suite 2701  
Toronto, Ontario  
M4P 1E4

Telephone: 416-481-1967  
Toll Free Number: 1-888-632-6273  
Fax: 416-440-7656  
Website: <http://www.oeb.gov.on.ca>  
Board Secretary's e-mail address: [boardsec@oeb.gov.on.ca](mailto:boardsec@oeb.gov.on.ca)



**ATTACHMENT 1****Directors of Suncor Energy Products Inc.**

- Steve Reynish
- Kris Smith
- Dan Sorochan

**Officers of Suncor Energy Products Inc.**

- Kris Smith, President, Alternative and Renewable Development Division
- Kris Smith, Executive Vice President
- Dan Sorochan, Senior Vice President
- Deborah Gullaher, Vice President
- Howard McIntyre, Vice President
- Steve Reynish, Vice President, Finance
- Anil Shah, Vice President and Treasurer
- Joe Vetrone, Vice President
- Janice Odegaard, Secretary
- Jim Provias, Vice President, Renewable Energy
- George Fraser, Assistant Secretary
- Chris Orr, Assistant Secretary, Alternative and Renewable Development Division
- Shawn Poirier, Assistant Secretary
- Leonard Chow-Wah, Vice President, Taxation
- Ross Walker, Public Officer, Australia

**Directors of Suncor Adelaide Wind GP Inc.**

- Belinda Phillips
- Brad West

**Officers of Suncor Adelaide Wind GP Inc.**

- Brad West, President
- Belinda Phillips, Vice President, Secretary and Treasurer

ATTACHMENT 2

