

**From:** [REDACTED]  
**Sent:** November-23-14 9:51 AM  
**To:** BoardSec  
**Cc:** Robert Caputo; John Pickernell; Kerry Ford  
**Subject:** Leave to Construct Application EB-2013-0339

Ms. Kirsten Walli,  
Board Secretary,  
Ontario Energy Board,

I am a resident, property owner and tax payer in the Municipality of the County of Prince Edward, in the Province of Ontario and therefore a stakeholder with an interest and voice in the subject Leave to Construct Application EB-2013-0339.

In the matter of EB-2014-0339, Procedural Order No. 6 dated November 14, 2014 wherein the Board has determined that the Board staff and Parties to the proceeding should have opportunity to provide further submissions regarding the documents filed by wpd White Pines on October 23, 2014; and which were not previously filed with the Board or available for public comment, I submit herewith the following comments:

Comment 1:

System Impact Assessment Report (Addendum), page 2, 3. Assessments, Tap Line, Table 1: Impedance of tap line – The impedance calculations are based on an assumption that the 69kV tap line is 28 kilometres in length. Please refer to page 1, 'Section 1. Notification of Condition Approval'; and 'Figure 1: Updated connection arrangement' drawing on page 3 of the System Impact Assessment Report Addendum (SIA) wherein the tap line / underground transmission circuit is identified as being 28 km in length.

In the applicant's Application for Leave to Construct submission dated September 18, 2013, the interconnection line (tap line in the SIA) is identified as being "approximately 28km" in Exhibit B, Tab 1, Schedule 1, line 16. Upon a comprehensive review of the information in the applicant's Leave to Construct submission it must be concluded that the length of the interconnection line is not disclosed or otherwise discussed; but rather is imprecisely specified as being "approximately 28km" in length.

The impedance of the tap line factors into the reactive power compensation calculations and the resulting conclusions in the SIA. The SIA is based upon a precise value of 28km. As noted above, from the information in the applicant's Leave to Construct submission, it is clear that the tap line / interconnection line is not 28km in length; but some other imprecisely specified value noted as "approximately 28km". Since the applicant's tap line / interconnection line is not 28km in length; but rather some other imprecisely described length, the calculations in the SIA cannot be considered to provide an accurate representation of the applicant's proposal. It is respectfully suggested that the System Impact Assessment Report (Addendum) dated July 21,

2014 be rejected on the basis that it does not accurately or adequately address the applicant's proposal.

Comment 2:

As of this date the applicant has not received Renewable Energy Approval (REA) for their proposed project. The tap line / interconnection line, for which the SIA Report (Addendum) has been prepared, forms part of the REA application which is subject to approval by the Ministry of Environment and Climate Change through that Ministry's REA review process. Unless and until a REA is issued for this project, there can be no certainty or guarantee that the tap line / interconnection line will follow the route as currently proposed . Unless and until a route has been confirmed and approved through the REA process, there can be no assurance that the tap line / interconnection line will ultimately be measured at 28km per the assumptions of the System Impact Assessment Report (Addendum) dated July 21, 2014.

In the absence of a REA, the applicant's tap line / interconnection line cannot be confirmed as being 28km in length as assumed in the calculations of the System Impact Assessment Report (Addendum) dated July 21, 2014, therefore it must be concluded that the assumptions and calculations of the SIA cannot be considered to provide an accurate representation of the applicant's proposal. Furthermore, it is not possible for the applicant to provide information of sufficient accuracy to properly complete a SIA in the absence of the route and length being confirmed by a REA. Therefore it is respectfully suggested that not only should the System Impact Assessment Report (Addendum) dated July 21, 2014 be rejected on the basis that it does not accurately or adequately address the applicant's proposal; but that the application be deferred or rejected in its entirety until such time as a REA is issued for the project.

Comment 3:

The System Impact Assessment Report (Addendum) dated July 21, 2014 prepared by ieso and included with the applicant's October 23, 2014 submission appears to contain acts of planning, designing, composing, evaluating, and/or advising that fall within the definition of the "practice of professional engineering" under the *Professional Engineers Act*, R.S.O. 1990, Chapter p.28. This document is not sealed by a professional engineer. Please advise if the OEB and/or proponent considers this document to be an act of the practice of professional engineering.

I await the applicant's response per Article 23.03 of the OEB's Rules of Practice and Procedure.

Please ensure that these comments are added to the record for the consideration of the Board in any hearing on the subject application.

Ray Ford

