

## STIKEMAN ELLIOTT

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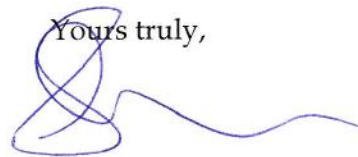
Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
Yonge-Eglinton Centre  
P.O. Box 2319  
2300 Yonge Street, Suite 2700  
Toronto ON M4P 1E4

Dear Ms. Walli:

**Re: wpd White Pines Wind Inc. (the "Applicant")  
EB-2013-0339**

Pursuant to Procedural Order No. 6, enclosed please find two copies of the Applicant's Response to Further Interrogatories from Board Staff and the Alliance to Protect Prince Edward County.

Yours truly,



Ingrid Minott

IM/dl

TORONTO

MONTREAL

OTTAWA

CALGARY

VANCOUVER

NEW YORK

LONDON

SYDNEY

IN THE MATTER of the *Ontario Energy Board Act, 1998*, S.O.  
1998, c. 15, Schedule B, (the “OEB Act”);

AND IN THE MATTER of an Application by wpd White Pines  
Wind Inc. for an Order or Orders granting Leave to Construct  
a new 69 kV transmission line and associated facilities in  
Prince Edward County, Ontario.

**WPD WHITE PINES WIND INC.’s (the “APPLICANT”) FURTHER RESPONSES TO  
INTERROGATORIES**

**1 INTERROGATORIES OF BOARD STAFF**

**2 Interrogatory 1**

3 Please provide an official letter from HONI (signed on HONI letterhead) confirming that an  
4 updated CIA based on the now proposed underground transmission line and the SIA  
5 Addendum dated July 21, 2014 is not required.

**6 Response**

7 An official letter from HONI is attached hereto as Appendix “A”.

**8 INTERROGATORIES OF THE ALLIANCE TO PROTECT PRINCE EDWARD COUNTY  
9 (“APPEC”)**

**10 APPEC Interrogatories re: System Impact Assessment Report Addendum**

**11 Interrogatory 1**

12 (a) What (if any) other changes to the project plans was the IESO informed of  
13 since 2011 when these reports were prepared?

14 (b) On July 24, 2013 or at any time thereafter was the IESO specifically informed  
15 about the change in the transmission line length from 24 km to 28 km that  
16 was made after the 2011 System Impact Assessment and Customer Impact  
17 Assessment?

- 1 (c) Please confirm that one of the changes to the original proposal was to extend  
2 the 69 kV tap line from 24 km to 28 km and that another change was to install  
3 a 69 kV tap line using underground cable instead of overhead line.

4 **Response**

5 (a) In addition to the change to the 69 kV transmission line from an overhead line to an  
6 underground line, the Applicant also advised the IESO of a minor change to the  
7 internal substation. Specifically, the Applicant advised the IESO of a change to the  
8 location of the internal substation to its current location. The change in the location  
9 of the internal substation resulted in a change to the electrical configuration from a  
10 two collector system to a three collector system. To accommodate the relocation of  
11 the internal substation, the 69 kV transmission line was changed to 28 km from 24  
12 km and the IESO was informed of this change at the same time that the Applicant  
13 advised of the change to the transmission line from an aboveground line to an  
14 underground line. It is possible that in preparing the System Impact Assessment  
15 Report Addendum (the "SIA Addendum") dated July 21, 2014, the IESO made  
16 additional ancillary technical changes flowing from the Applicant's changes.

17  
18 (b) As noted in response 1(a) above, the IESO was informed of the change in the length  
19 of the transmission line from 24 km to 28 km at the same time that the Applicant  
20 advised the IESO of the change from an overhead line to an underground  
21 transmission line.

22  
23 (c) The Applicant confirms that the 69 kV transmission line was changed from 24 km to  
24 28 km and that the line was changed from an overhead line to an underground line.

25 **Interrogatory 2**

26 (a) What is wpd White Pines seeking approval for in this leave to construct  
27 application: the 2011 System Impact Assessment Report and conditional

1 approval (for a 24 kilometre overhead line) and the System Impact Assessment  
2 Report Addendum?

3 (b) In the event that during the construction process it is found that the 69 kV  
4 transmission line is unable to be buried is wpd White Pines prepared to make  
5 use of the 2011 Conditional Approval?

6 **Response**

7 (a) The Applicant is seeking approval of a 28 km 69 kV underground transmission line  
8 and ancillary facilities and relies on the SIA Addendum and the Notification of  
9 Addendum of Conditional Approval to Connection Proposal.

10 (b) In the event that unforeseen circumstances arise and the Applicant cannot bury the  
11 transmission line underground, the Applicant will investigate all available  
12 alternatives.

13 **Interrogatory 3**

14 Please explain how wpd White Pines proposes to adhere to the requirements stipulated in both  
15 SIA Reports given the specific nature of the scope and requirements of each.

16 **Response**

17 Given the changes identified in the Applicant's response to interrogatory 1(a), it is the  
18 Applicant's view that the SIA Addendum has completely replaced the 2011 SIA and as such,  
19 the Applicant will only comply with the connection requirements set out in the SIA  
20 Addendum.

21 **Interrogatory 4**

22 Please explain what a "reasonable" connection requirement would mean in the context of  
23 this application. In the event that one or more connection requirements in the amended SIA  
24 are considered unreasonable can wpd White Pines opt to follow 2011 SIA connection  
25 requirements instead?

**Response**

Having received the SIA Addendum, the Applicant is satisfied with the connection requirements contained therein and does not consider any of the connection requirements to be unreasonable.

**APPEC Interrogatories re: email communications between wpd, the IESO, Hyrdo One from August 14, 2013 to October 20, 2014 regarding the Customer Impact Assessment**

**Interrogatory 5**

Please confirm that the report attached to the January 29, 2014 email from the IESO to Hydro One with the subject line: "FW: Transformer parametres and D-VAR model" is the final version of the System Impact Assessment Report Addendum. If this was not the final version but rather a draft please have wpd advise as to the state of its completeness or provide a copy of the draft.

**Response**

The report attached to the January 29, 2014 email was a draft version of the SIA Addendum. All revisions to the draft SIA Addendum have been addressed. The SIA Addendum dated July 21, 2014 and filed with the Board on October 23, 2014 is the final version of the SIA Addendum, and is also referenced in HONI's letter attached hereto as Appendix "A".

**Interrogatory 6**

It is clear from the February 19, 2014 email that Hydro One was aware of some project changes to the White Pines Wind Farm but it is unclear as to what they are. Please provide clarification on this.

**Response**

The Applicant does not communicate directly with HONI to notify HONI of project changes. The process requires the Applicant to inform the IESO of any changes to the transmission project and the IESO then informs HONI of these changes. It is the Applicant's

1 understanding that the IESO informed HONI of all material changes, including the changes  
2 identified in HONI's letter attached hereto as Appendix "A".

3 **Interrogatory 7**

4 Was Quyen Diep at Hydro One informed of the project modification to bury the  
5 transmission line? Was Mr. Diep informed of other significant modifications to the  
6 transmission project which had occurred since 2011?

7 **Response**

8 As noted above in the Applicant's response to interrogatory 7, it is the Applicant's  
9 understanding that the IESO informed HONI, including Quyen Diep, of all material  
10 changes to the transmission project, including the change from an overhead to an  
11 underground transmission line.

## **APPENDIX “A”**

**HONI LETTER DATED DECEMBER 1, 2014**

**Hydro One Networks Inc.**

483 Bay Street  
North Tower, 15<sup>th</sup> Floor  
Toronto, Ontario M5G 2P5  
www.HydroOne.com

Tel: (416) 345-5390  
Email: john.walewski@hydroone.com



John H. Walewski  
Manager, Network Connections  
Network, Connections & Development

December 1, 2014

Mr. Paul Deol  
wpd Canada  
2233 Argentia Road, Suite 102  
Mississauga, ON L5N 2X7

Attention: Paul Deol  
Project Engineer

Dear Paul:

**Re: SIA-CAA ID: 2010-401 Addendum dated July 21, 2014**

The System Impact Assessment for White Pines Wind Farm (CAA ID 2010 - 401) was completed on October 26, 2011. The Independent Electricity System Operator (IESO) notified Hydro One Networks Inc. (HONI), on November 14, 2013, that the connection applicant would be making the following changes to the original proposal:

1. Install 28 km underground cable instead of overhead line for the 69 kV tap line;
2. Modify impedances for two step-up transformers (230/69 kV and 69/34.5 kV).
3. Modify the collector system design to use underground cables;
4. Install three collector feeders instead of two.

HONI informed the IESO on Wednesday February 19, 2014, that the above changes to the application does not significantly impact the results of the CIA and no CIA addendum will be issued.

Yours truly,

**HYDRO ONE NETWORKS INC.**

A handwritten signature in blue ink, appearing to read "J. H. Walewski".

John H. Walewski  
Manager, Network Connections

cc: Farooq Qureshy – Manager Transmission Planning  
cc: Quyen Diep – Network Management Engineer  
cc: J. Brent Currie – Network Management Engineer