

Santo Giorno

[REDACTED]  
[REDACTED]  
[REDACTED]

Phone: [REDACTED]

Email: [REDACTED]

December 8, 2014

Re: EB-2014-0295

Ms Kirsten Walli  
Secretary, Ontario Energy Board  
Box 2319, 27th Floor  
2300 Yonge Street  
Toronto M4P 1E4  
[boardsec@ontarioenergyboard.ca](mailto:boardsec@ontarioenergyboard.ca)

Dear Ms. Walli:

As described in Section 23 of the OEB's *Rules of Practice and Procedures*, please accept this document as a summary of my comments and concerns on Suncor's Application to construct distribution infrastructure for their Cedar Point wind project on the Town of Plympton-Wyoming's road allowances.

As a homeowner, property taxpayer and resident in the Town of Plympton-Wyoming, my interests are to verify that this project's distribution infrastructure has been designed with due diligence to minimize any negative impact on the Town, the safety of the roads that I and my family travel on, and on the cost impact that this project may have on my property taxes.

I understand that I do not have the same status as an intervenor, but I ask that Suncor address my concerns as required in Section 23.03 of the OEB's *Rules*.

Yours truly

Original signed by:  
Santo Giorno

**IN THE MATTER OF** the *Electricity Act, 1998*, S.O. 1998, c. 15, Schedule A;

**AND IN THE MATTER OF** an application by Suncor Energy Products Inc. to  
determine the location of electricity distribution facilities within road allowances  
owned by the Town of Plympton-Wyoming.

EB-2014-0295

**Preamble:**

I am aware of the Board's mandate in this hearing. From the Board's Procedural Order 1: the scope of the Board's mandate is defined as:

“The Board’s jurisdiction in this matter is strictly limited to determining the location of the distribution facilities within the road allowances where there is disagreement. The question for this case is therefore not whether Suncor may locate its distribution facilities within the road allowances, but rather, where specifically within the road allowances the distribution facilities will be located.”

**1. Location of the distribution facilities:**

From Suncor's application, Exhibit B, Tab 2, Schedule 1, pages 2 – 3:

48 The Applicant has secured rights in certain privately owned lots on which certain segments of  
49 the Distribution System will be situated. The Distribution System will also occupy  
50 approximately 22.615 km of streets and highways ("Road Allowances") that are owned by the  
51 Town, as more particularly described in Exhibit B, Tab 5, Schedule 1 (the "Road Allowances").  
52 A Maps illustrating the proposed location of the entire Distribution System are provided in  
53 Appendix A of this Exhibit B, Tab 2, Schedule 1 and in Appendix L of Exhibit B, Tab 4,  
54 Schedule 1.

I submit that the proposed location of Suncor's distribution facilities is not clearly defined.

There are significant discrepancies in the location of the distribution facilities between Suncor's Notice of Application, as shown on the map, page 2, and the map in Appendix A of this Exhibit B, Tab 2, Schedule 1 and in Appendix L of Exhibit B, Tab 4, Schedule 1

Note: The Notice, and the map in Appendix A of the Application are attached to this document for the convenience of the parties to this hearing.

In addition; there are nine (9) alternate sites in Suncor's proposed Cedar Point project. It is my understanding that several alternate sites are within the Town limits. Since these sites will not be developed, this will have a significant impact on the required distribution facilities and on the location of those facilities. I would point out that the final 55 sites, including the 9 alternates, were identified as far back as May 2013, when they were displayed at Suncor's open houses as exhibits. To claim that the final sites have not yet been selected, nearly 18 months later, would suggest that this Application is premature.

In order for me, (or the Board, or the Town of Plympton-Wyoming) to properly assess Suncor's application and respond accordingly, the specific, and final, locations on the Town's roads must be identified.

Due to Suncor's incomplete application, I respectfully suggest that the Board require Suncor to identify the final turbine sites, as they are currently planned, and clearly identify the proposed distribution facilities required for the final sites.

### **Concern 1\_S Giorno\_1:**

1.1: Suncor has not confirmed that the diagram in their Application is the correct version and that the diagram in their Notice is no longer accurate.

1.2: Suncor has not identified the current final and alternate sites, nor have they indicated which portions of the distribution facility would NOT be required due to the removal of the alternate sites from the project plan.

1.3: Suncor has not confirmed that there will be NO distribution facilities installed and left on any portion of the Town's road allowances that are not required for the final 46 turbine sites.

## **2. Modification Report**

In its Modification document, Modification 1, page 1.1; Suncor indicated that an additional segment of distribution facilities along Douglas Line and another segment along Uttoxeter Road, from Douglas Line to Hubbard Line was added because it "provides Suncor with greater design flexibility and minimizes pinch points with respect to connecting Project turbines with the substation."

I find Suncor's rationale to be vague and without substance, especially in light of Suncor's earlier project plan that did not include this section of distribution line. I would also point out that this increased "flexibility" would result in an additional 2725 meters of distribution line on the Town's road allowance.

### **Concern 2\_S Giorno\_2:**

2.1: Suncor has not provided a detailed technical explanation as to why the original distribution route in the road allowance along Blue Heron Road is unacceptable, and why an additional 2725 meters of distribution line in the road allowance of Uttoxeter Road is required.

## **3. Obstacles**

From Suncor's application, Exhibit B, Tab 2, Schedule 1, pages 2 – 3:

31 installed underneath watercourses, woodlots or roads, by means of directional drilling. There  
32 may be occasional locations where the collection lines are placed above ground on wood,  
33 concrete or steel poles in the event that a physical obstruction is discovered during construction.

And,

44 3) When locating lines within road allowances, the Applicant shall install the lines  
45 within 1m of the property limit of the right of way, unless unknown obstacles are

46 discovered. In such a case the location shall be as far from the travelled portion of the 47 road as possible.

### **Concern 3\_S Giorno\_3:**

3.1: Suncor has not identified any obstacles that they may already be aware of that would require a deviation from the setback of 1m from the property limits

3.2: If there are known obstacles, Suncor has not identified the location of each obstacle, the change in setback that will be required, and detailed drawings showing the changes.

3.3: If above ground sections are required, Suncor has not provided detailed drawings of the above ground locations, specifically, the locations of any poles that will be installed on the Town's road allowances.

3.4: If above ground sections are required, Suncor has not provided detailed engineering drawings and specifications for the types of poles to be used.

3.4: In the event that Suncor plans to use existing Hydro One poles for some above ground segments, Suncor has not confirmed that an agreement has been negotiated with Hydro One.

## **4. Natural Gas Line along Douglas Line**

Exhibit B, Tab 5, Schedule 1. There are four segments (25, 29, 31, and 35) in the road allowances along Douglas Line for a total of 3657 meters.

Union Gas has a natural gas line along portions of Douglas Line.

### **Concern 4\_S Giorno\_4:**

4.1: Suncor has not confirmed that they have an agreement with Union Gas with respect to the location of that portion of the distribution line that will be on the same side of Douglas Line and adjacent to the Union Gas line.

4.2: Suncor has not provided detailed drawings showing their distribution line and the Union gas line in that portion of the road allowance where both lines are on the same side of the road.

## ONTARIO ENERGY BOARD NOTICE (Revised October 30, 2014)

### **Suncor Energy Products Inc. has applied to the Ontario Energy Board to determine the location of electricity distribution facilities within road allowances owned by the Town of Plympton-Wyoming. Learn More.**

Suncor Energy Products Inc. plans to own and operate the generation and distribution assets associated with the Suncor Cedar Point II Wind Energy Project in the Municipality of Lambton Shores, the Township of Warwick and the Town of Plympton-Wyoming, in Lambton County. To convey the electricity from the wind generation to the provincial electricity grid, Suncor Energy Products Inc. proposes to construct and operate a distribution system including 22.615 km of distribution line which it plans to locate within certain road allowances owned by the Town of Plympton-Wyoming. Because Suncor Energy Products Inc. and the Town of Plympton-Wyoming have not been able to reach agreement regarding the location of the distribution facilities, Suncor Energy Products Inc. is asking that the Ontario Energy Board determine the location of the distribution facilities within the municipal road allowances.

**A map showing the potentially affected road allowances is appended to this Notice.**

#### **THE ONTARIO ENERGY BOARD IS HOLDING A PUBLIC HEARING**

The OEB is an independent and impartial public agency. It will hold a public hearing to consider Suncor Energy Products Inc.'s request. During this hearing, the OEB will consider evidence and arguments by Suncor Energy Products Inc., the Town of Plympton-Wyoming and others whose interests would be affected.

***The OEB hearing will consider specific issues determined by law. The Electricity Act, 1998 specifies that the OEB is strictly limited to determining the location of the distribution facilities within the road allowances in question. The OEB will not consider alternative locations for the distribution facilities outside of the road allowances or any aspect of the wind generation project in this case.***

#### **BE INFORMED**

You have the right to information regarding Suncor Energy Products Inc.'s application. You can read the application on the OEB's website (See below under "Learn More").

#### **HAVE YOUR SAY**

If you would be affected by the location of the distribution facilities within the road allowances owned by the Town of Plympton-Wyoming, you may want to take a more active role in the hearing. You can:

- Send the OEB a letter with your comments within 60 calendar days from the date this Notice is posted on applicant's website, which will be considered during the hearing; or
- Ask the OEB for permission to be an active participant in the hearing (an intervenor). Intervenors can provide evidence, argue their positions and submit relevant questions to be answered by Suncor Energy Products Inc. (interrogatories). To be an intervenor, a party must be affected by the location of the facilities in a way that relates directly to the issues the OEB will consider. If you wish to be an intervenor, the OEB must receive your request by **[insert actual date 10 calendar days from the date the Revised Notice is posted on applicant's website]**.

#### **LEARN MORE**

Our file number for this case is **EB-2014-0295**. To learn more about how to participate in this hearing, including how to file a letter with your comments or how to become an intervenor, go to [www.ontarioenergyboard.ca/participate](http://www.ontarioenergyboard.ca/participate). From that OEB web page you can also enter the file number **EB-2014-0295** to see all the documents related to this case. You can also phone our Consumer Relations Centre at 1-877-632-2727 with any questions.

#### **ORAL AND WRITTEN HEARINGS**

There are two types of OEB hearings – oral and written. Suncor Energy Products Inc. has applied for a written hearing. If you think an oral hearing is needed, you can write to the OEB to explain why.

#### **PRIVACY**

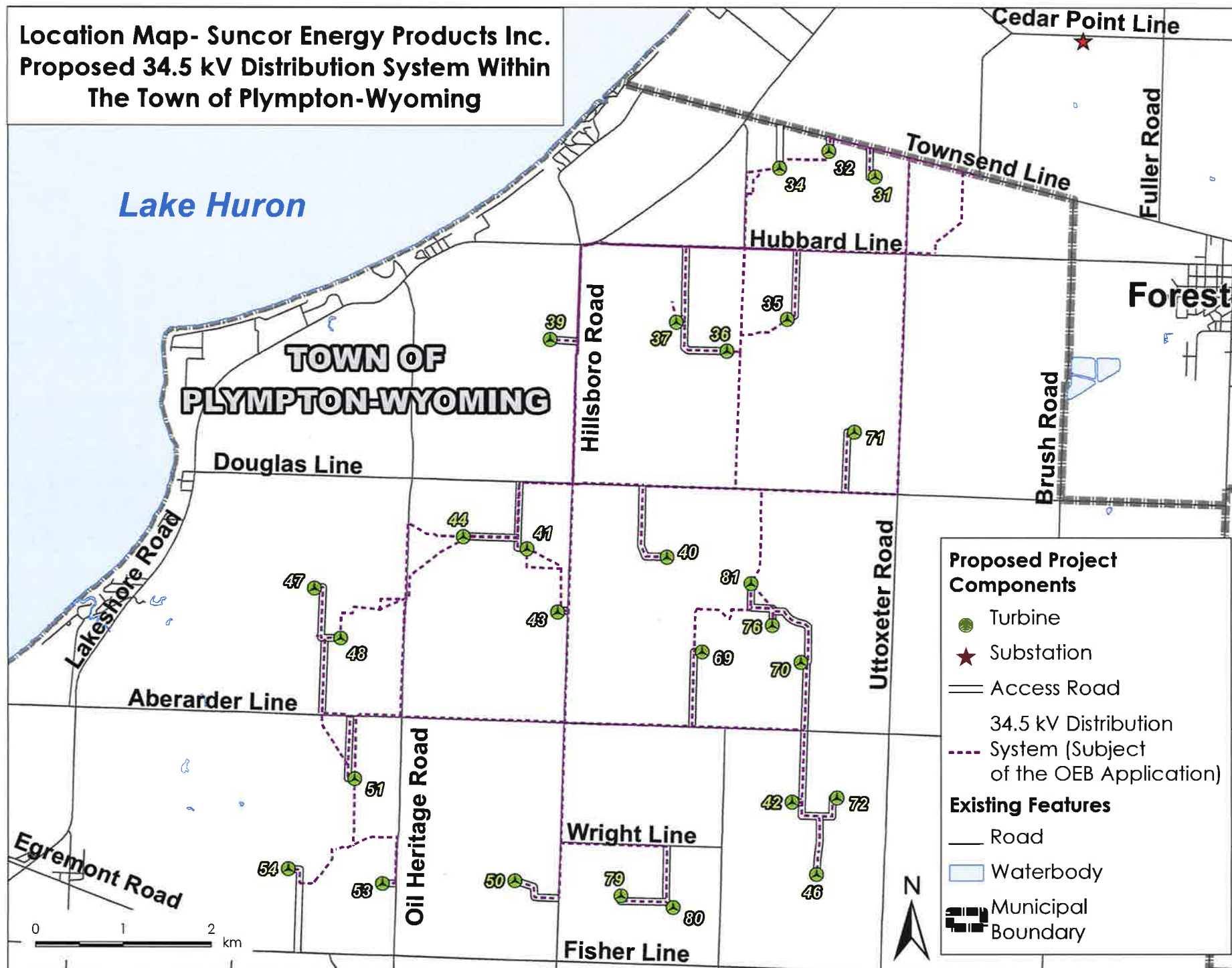
If you write a letter with your comments, your name and the content of your letter will be put on the OEB's public record and the OEB website. However, your personal telephone number, address and email address will be removed. If you are a business, all your information will be public. If you apply to become an intervenor, all your information will be public.

This application was filed under section 41(9) of the *Electricity Act, 1998 S.O. 1998, c. 15, Schedule A*.

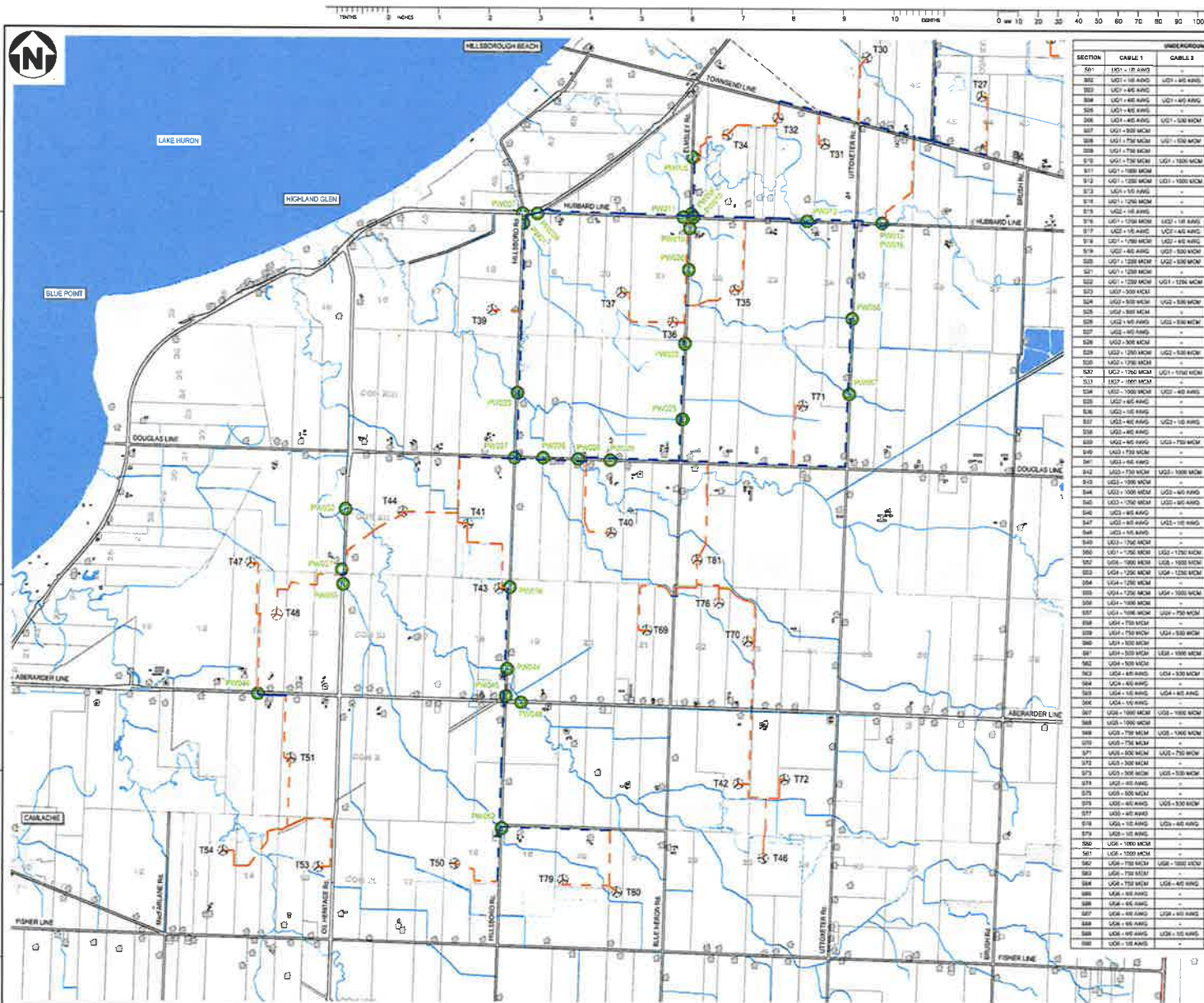


Ontario  
Ontario Energy Board  
L'Ontario  
Le Conseil de l'énergie  
du Québec

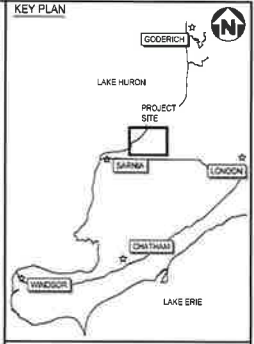
**Location Map- Suncor Energy Products Inc.  
Proposed 34.5 kV Distribution System Within  
The Town of Plympton-Wyoming**







SECTION	CABLE 1	CABLE 2	CABLE 3	CABLE 4	TRUNK	DRILLING
501	UG1 - 18 AWG	-	-	-	DETAIL 1	DETAIL 1
502	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 2	DETAIL 2
503	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 3	DETAIL 3
504	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 4	DETAIL 4
505	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 5	DETAIL 5
506	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 6	DETAIL 6
507	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 7	DETAIL 7
508	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 8	DETAIL 8
509	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 9	DETAIL 9
510	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 10	DETAIL 10
511	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 11	DETAIL 11
512	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 12	DETAIL 12
513	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 13	DETAIL 13
514	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 14	DETAIL 14
515	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 15	DETAIL 15
516	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 16	DETAIL 16
517	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 17	DETAIL 17
518	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 18	DETAIL 18
519	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 19	DETAIL 19
520	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 20	DETAIL 20
521	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 21	DETAIL 21
522	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 22	DETAIL 22
523	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 23	DETAIL 23
524	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 24	DETAIL 24
525	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 25	DETAIL 25
526	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 26	DETAIL 26
527	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 27	DETAIL 27
528	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 28	DETAIL 28
529	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 29	DETAIL 29
530	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 30	DETAIL 30
531	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 31	DETAIL 31
532	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 32	DETAIL 32
533	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 33	DETAIL 33
534	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 34	DETAIL 34
535	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 35	DETAIL 35
536	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 36	DETAIL 36
537	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 37	DETAIL 37
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539	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 39	DETAIL 39
540	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 40	DETAIL 40
541	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 41	DETAIL 41
542	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 42	DETAIL 42
543	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 43	DETAIL 43
544	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 44	DETAIL 44
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547	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 47	DETAIL 47
548	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 48	DETAIL 48
549	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 49	DETAIL 49
550	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 50	DETAIL 50
551	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 51	DETAIL 51
552	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 52	DETAIL 52
553	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 53	DETAIL 53
554	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 54	DETAIL 54
555	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 55	DETAIL 55
556	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 56	DETAIL 56
557	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 57	DETAIL 57
558	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 58	DETAIL 58
559	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 59	DETAIL 59
560	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 60	DETAIL 60
561	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 61	DETAIL 61
562	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 62	DETAIL 62
563	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 63	DETAIL 63
564	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 64	DETAIL 64
565	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 65	DETAIL 65
566	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 66	DETAIL 66
567	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 67	DETAIL 67
568	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 68	DETAIL 68
569	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 69	DETAIL 69
570	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 70	DETAIL 70
571	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 71	DETAIL 71
572	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 72	DETAIL 72
573	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 73	DETAIL 73
574	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 74	DETAIL 74
575	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 75	DETAIL 75
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577	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 77	DETAIL 77
578	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 78	DETAIL 78
579	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 79	DETAIL 79
580	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 80	DETAIL 80
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584	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 84	DETAIL 84
585	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 85	DETAIL 85
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587	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 87	DETAIL 87
588	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 88	DETAIL 88
589	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 89	DETAIL 89
590	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 90	DETAIL 90
591	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 91	DETAIL 91
592	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 92	DETAIL 92
593	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 93	DETAIL 93
594	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 94	DETAIL 94
595	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 95	DETAIL 95
596	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 96	DETAIL 96
597	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 97	DETAIL 97
598	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 98	DETAIL 98
599	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 99	DETAIL 99
600	UG1 - 18 AWG	UG1 - 18 AWG	-	-	DETAIL 100	DETAIL 100



- LEGEND**
- 1100 TURBINE LOCATION & TURBINE NAME
  - WOODED AREA
  - FARM BUILDING
  - EXISTING RECEPTOR
  - SUNCOR PROPOSED COLLECTOR ROUTE ON PRIVATE PROPERTY
  - SUNCOR PROPOSED COLLECTOR ROUTE WITHIN THE MUNICIPAL RIGHT OF WAY LIMIT
  - MUNICIPAL DRAIN CROSSING LOCATION WITHIN MUNICIPAL RIGHT OF WAY LIMIT

- NOTES**
- COORDINATES SHOWN ON THIS DRAWING ARE BASED ON NAD 83, ZONE 17.
  - SUNCOR TO DIRECTIONALLY DRILL BENEATH ALL EXISTING ENTRANCES WITHIN THE MUNICIPAL RIGHT OF WAY LIMIT.



**NOT TO BE USED FOR CONSTRUCTION**

<p>PROJECT NO. 173709</p> <p>ACTIVITY NO. NTS</p>		<p>BY: J. MALL, MAY '14</p> <p>CHK: M. HALL, MAY '14</p> <p>APP: J. MALL, MAY '14</p>		<p>SUBJECT: 34.5KV COLLECTOR SYSTEM LAYOUT TOWN OF PLYMPTON-WYOMING - PLAN -</p>		<p>AREA: CEDAR POINT WIND POWER PROJECT</p> <p>CLIENT: SUNCOR ENERGY</p> <p>ISSUING NO: 173709-0300-DF00-SKT-0906.001</p>	
<p>DATE: 10-APR-14 4:37 PM</p> <p>SCALE: 1"=100'</p>		<p>DATE: 10-APR-14 4:37 PM</p> <p>SCALE: 1"=100'</p>		<p>DATE: 10-APR-14 4:37 PM</p> <p>SCALE: 1"=100'</p>		<p>DATE: 10-APR-14 4:37 PM</p> <p>SCALE: 1"=100'</p>	