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December 8, 2014

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**EMAIL AND COURIER**

Ontario Energy Board  
P.O. Box 2319  
27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

Attention: Ms. K. Walli, Board Secretary

Dear Ms. Walli:

**Re: EB-2014-0295 – Interrogatories of Suncor Energy Products Inc. ("Suncor")**

We are counsel to Suncor.

Further to Order 3 of Procedural Order No. 1 in this matter, enclosed, please find Suncor's interrogatories to the Corporation of the Town of Plympton-Wyoming ("**Town**").

Yours truly,

**FOGLER, RUBINOFF LLP**

Albert M. Engel

cc: C. Brett, Suncor  
C. Scott, Suncor  
J. Hood, Suncor

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Sched. B);

**AND IN THE MATTER OF** an application by Suncor Energy Products Inc. ("**Suncor**") for an Order or Orders pursuant to Section 41(9) of the *Electricity Act, 1998* (as amended) establishing the location of the applicant's distribution facilities within certain road allowances owned by the Corporation of the Town of Plympton-Wyoming ("**Town**"), all as set out in this application.

**SUNCOR INTERROGATORIES TO TOWN**

December 8, 2014

**SUNCOR INTERROGATORIES TO TOWN**

1   **1.0    Suncor Interrogatory 1**

2   Reference:

3   Evidence of the Town of Plympton-Wyoming (the "Town") dated November 27, 2014 ("**Town's**  
4   **Evidence**") – paragraph 4

5   Preamble: In paragraph 4 of the Town's Evidence, the Town states that it has "significant concerns  
6   regarding the placement of the distribution facilities in its road allowances and is seeking to address these  
7   concerns with the Applicant".

8   Questions/Requests:

9   1.1    What are the Town's specific concerns with the proposed locations of the distribution facilities?

10  **2.0    Suncor Interrogatory 2**

11  Reference:

12  Town's Evidence – paragraph 7

13  Preamble: In paragraph 7 of the Town's Evidence, the Town requests that "the following condition be  
14  added as a further requirement to the specific requirements noted in the Application at Exhibit B, Tab 2,  
15  Schedule 1, page 2, lines 38-47".

16  Lines 35-37 of Exhibit B, Tab 2, Schedule 1, page 2, provide context to the list of conditions agreed to by  
17  Suncor: "Additionally, on June 6, 2014, at the Town's request, the Applicant committed to the Town to  
18  locating the Distribution System lines in accordance with the following specific requirements:".

19  Lines 38-47 of Exhibit B, Tab 2, Schedule 1, page 2, are the list of requirements that Suncor committed to  
20  following the Town's request ("**June 6 Commitments**"):

21           1) Crossings of municipal road allowances will be installed by directional drilling the lines  
22           underground in conduit at least 1.5m below the invert of the ditch and 2.5m below the centre line  
23           of the travelled portion of the road;

24           2) Crossings of Municipal Drains located within the Municipal road allowances will be installed  
25           by directional drilling the lines in conduit at least 1.5m beneath the invert of the municipal drain;  
26           and

27           3) When locating lines within road allowances, the Applicant shall install the lines within 1m of  
28           the property limit of the right of way, unless unknown obstacles are discovered. In such a case the  
29           location shall be as far from the travelled portion of the road as possible.

30  The Town is requesting, in addition to the June 6 Commitments, the following additional condition (the  
31  "**Requested Condition**"):

32 In all instances, where a line is located within the municipal road allowance, the exterior of the  
33 conduit enclosing the lines must have a minimum of 1.5 m of cover in all planes, vertically and  
34 horizontally, at all locations, at all times.

35 Questions/Requests:

36 2.1 Given that the Ontario Electrical Safety Code requires a minimum of 1 m of cover, what is the  
37 technical basis for the 1.5 m of cover set out in the Requested Condition?