

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 pursuant to Section 92 of the Ontario Energy Board Act, 1998 granting Leave to Construct transmission facilities in Prince Edward County.

SUBMISSIONS OF THE ALLIANCE TO PROTECT PRINCE EDWARD COUNTY (“APPEC”) RE ADDITIONAL EVIDENCE OF wpd WHITE PINES WIND INC.

1. This submission concerns (1) evidence filed by the Applicant on October 23, 2014, (2) the Applicant's response to APPEC interrogatories and (3) letter dated December 1, 2014 from Hydro One to the Applicant, filed by the Applicant on December 3, 2014.
2. In response to APPEC Interrogatory 6 the Applicant claims to have followed the correct procedure which is to notify the IESO of changes: “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.”
3. While APPEC is open to the possibility that this is the correct process to follow for changes to transmission projects it does not seem that the changes the Applicant would be making only involve the transmission project. For example, the Applicant proposes to install a static capacitive compensation device of 3 Mvar at 34.5 kV to satisfy the reactive power requirement based on updated information on the 69 kV cable and the collector system.

4. Also, some changes seem not to involve the transmission project at all. In this regard, two changes identified in Hydro One's December 1, 2014 letter are to “Modify the collector system design to use underground cables” and to “Install three collector feeders instead of two”.
5. Further to this, the Hydro One letter referenced above indicates that Hydro One was informed on November 14, 2013 that the connection applicant would be making four changes to the original proposal. Yet the System Impact Assessment Report (Addendum) that was recently filed by the Applicant indicates that the connection applicant is making five changes. One of the five changes, to “Install a 10 MVar @ 115 kV inductor at LV side of 230/69 kV transformer”, is not included in Hydro One's letter which implies that Hydro One has not been notified about this change.
6. Since the issuance of the CIA in 2011 there have been a number of changes to the project. These include but are not limited to changes in siting wind turbine generators and changes to the collector system design including the four kilometre expansion to accommodate the relocation of the internal substation. These and other changes appear to have gone under the radar. The summary in the CIA is not even correct in stating that “The voltage will be stepped down to 69 kV and connected to the wind farm's collector system about 24 km away.”
7. The Applicant's understanding that Applicants do “not communicate directly with HONI to notify HONI of project changes” does not hold up to scrutiny. Hydro One's role is to assess the implications of the Transmission Facilities for customers of the transmission system in terms of reliability and performance. Indeed the Protection Impact Assessment (PIA) is prepared by HONI. The process is clear in its requirement that Applicants notify the IESO and Hydro One.

K2 Wind Ontario, for example, indicates in its leave to construct application that: “As a result of subsequent changes to the configuration of the Project, K2 Wind applied to the IESO and Hydro One. . .for amendments to the SIA and CIA Reports.”

8. The above is ample evidence that HONI should have been notified of the five changes that were being made to the original proposal at the same time the IESO was notified. Also, both HONI and the IESO should have been notified of other changes since 2011 when the CIA was issued.
9. On the basis of the foregoing APPEC respectfully requests that the Applicant fulfill its responsibility to formally notify HONI of modifications to the White Pines wind generation facility since 2011. The fact that the Applicant misunderstood the process does not absolve the Applicant of its responsibility to notify HONI. The fact that the IESO has notified HONI “of all material changes” or, at least, of the four changes to the original proposal does not make things right. APPEC would also request that the Applicant specifically notify individuals at HONI in Transmission System Development who are accountable for CIAs and Amendments such as Mr. Farooq Queresy, Transmission Planning Manager - Central and Eastern (cc-d in Hydro One's letter).
10. In this formal notification Hydro One should also be informed of the potentially imminent approval of Windlectric's 75 MW wind generation facility on Amherst Island. The Amherst Island Wind Project is in close proximity to the White Pines Wind Project and is at the same stage of the REA approval process. The Amherst Island wind generation facility is not accounted for in the CIA.

11. APPEC also requests that the Applicant notify the IESO of all modifications to the White Pines wind generation facility since 2011. The IESO should also be informed of Windlectric's facility on Amherst Island, especially given the location of the Lennox generating station in relation to both wind generation facilities.
12. In closing, APPEC has grave concerns with the Applicant's response to Interrogatory 2 (b) as follows: "In the event that unforeseen circumstances arise and the Applicant cannot bury the transmission line underground, the Applicant will investigate all available alternatives".
13. The Board has previously stated that if it "decides to approve this application, Board staff suggests that the approval be conditioned on the applicant obtaining the amended SIA from the IESO and abiding by the conditions of the amended SIA and any future amendments to it." APPEC respectfully requests that if approval is granted that it be conditional on the Applicant abiding by the changes to the original proposal.

Date: December 10, 2014

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