

**SUNCOR'S RESPONSES TO RON CORNELIS' LETTER COMMENTS DATED**  
**NOVEMBER 30, 2014**

**Question No. 1**

1a. Please provide an expanded table listing of the Road Allowances with additional columns to specify the following:

- corridor positioning of the underground distribution within the road allowance, within a 2m range e.g., "1-3 m from the north edge of the roadway";
- where changes, if any, have been made from preliminary drawings;
- construction type - overhead or underground for each segment and crossing.

Suncor filed additional evidence with the Board on November 27, 2014, which included detailed plan and profile drawings of the proposed underground distribution infrastructure. These drawings clearly indicate the side of the road the cable is proposed, including the positioning from the edge of the adjacent property lines.

In Suncor's responses to the Board Staff Interrogatories filed on December 19, 2014, Suncor provided a figure which shows the alternative locations for the distribution facilities that Suncor has considered and subsequently rejected in favour of the current configuration. The yellow lines on the figure indicate these alternative locations which have now been rejected.

As currently proposed, all infrastructure is proposed to be located underground.

1b. Has Suncor located utilities and other obstacles which have to be avoided? For example, location of anticipated obstructions and the possible location of any proposed above ground location of poles as well as any and all other relevant locational information such as the location of other utility infrastructure (for example, Bell, HONI, Union Gas).

Yes. Surveys have been conducted to identify the locations of utilities and other potential obstacles, and these obstacles have been taken into consideration in the existing design.

Suncor's contractor will also confirm the exact location before starting work. As noted on each plan and profile drawing, Note 7 states "before starting work, the contractor shall confirm the exact location of all utilities and structures and shall assume all liability for damages to them".

1c. How does Suncor propose to ensure the integrity of other utilities in the road allowances are not affected?

Please see the above response to Question 1b.

- 1d. Where HONI distribution poles are located in the road allowances proposed for the distribution facility, has Suncor determined whether it will locate its distribution facility using that existing infrastructure? If not, please provide the rationale.

The location of HONI infrastructure has been identified on each plan and profile drawing and has been considered in Suncor's design. In most cases, Suncor infrastructure is placed on the opposite side of the road of HONI infrastructure. Suncor infrastructure is proposed to be located underground and will not be co-locating utilities on HONI's above ground infrastructure.

**Question No. 2**

2. Please provide Suncor's position regarding implementing as a general principle the installation of distribution lines within 1 m of the property limit of the right of way.

In consultation with the Town Staff, Staff have specifically requested Suncor to, where possible, locate infrastructure within road allowances 1m from the property limit so as to locate infrastructure as far from the travelled portion of the road as possible. Suncor agrees with this request.

**Question No. 3**

3. Has Suncor received an alternative or preferred location from the Town of Plympton-Wyoming? If yes, please provide the details of that alternative and Suncor's response.

The Town of Plympton-Wyoming has not provided alternative or preferred routing options for Suncor's proposed infrastructure, nor has the Town objected to the current design provided. The Town has provided technical requests, such as the location of infrastructure at 1m from the property limit where possible, as well as commitments to be below the invert of drains at a certain depth, to which Suncor has agreed.

**Question No. 4**

- 4.1. Is this REA currently under appeal?

Yes. The REA is currently subject to an appeal to the Environmental Review Tribunal.

- 4.2. Does Suncor anticipate that a successful appeal may impact the location of its distribution facilities? If yes, please explain the potential impact.

The REA gives Suncor the right to construct the project. The construction of the distribution facilities within the Town's streets and highways requires Town agreement or OEB approval. If the REA is amended or revoked as a result of the appeal and the amendment or revocation is upheld on further appeal, then construction of some or all of the distribution facilities within Town streets and highways may no longer be required.

- 4.3. Has Suncor determined that it will begin construction of the distribution facilities before an ERT Appeal Decision and Order, if relevant, occurs? If yes, please explain the rationale for such an approach.

Suncor's distribution facilities are the subject of this application and as such, Suncor cannot proceed with distribution facility construction within Town of Plympton-Wyoming road allowances prior to the execution of a Road Use Agreement with the Town of Plympton-Wyoming or a decision of the Board approving the locations proposed, whichever is sooner.

**Question No. 5**

5. Please provide Suncor's current position on the following commitments.

- (a) Crossings of Municipal Road allowances will be installed by directional drilling the cables beneath in conduit at least 1.5m below the invert of the ditch and 2.5 m below the centre line of the travelled portion of the road;
- (b) Crossing of Municipal Drains located within the Municipal road allowances will be installed by directional drilling the cables in conduit at least 1.5m beneath the invert of the municipal drain.
- (c) When locating cables within the road allowance, Suncor shall install the cables within 1 m of the property limit of the right of way, unless unknown obstacles are discovered. In such a case, the location shall be as far from the travelled portion of the road as possible.

Suncor's current position is to honour commitments made on June 6, 2014, unless otherwise revised in negotiations with Town Staff.