

March 2, 2015

RESS, EMAIL & COURIER

Ontario Energy Board
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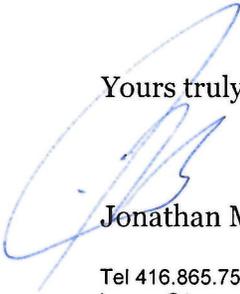
Attention: Ms. K. Walli, Board Secretary

Dear Ms. Walli:

Re: Hydro One Networks Inc. Application for Leave to Construct Transmission Facilities in the Windsor-Essex Region (EB-2013-0421) - Interrogatories from Comber Wind LP

We are counsel to Comber Wind LP ("Comber"), intervenor in the above-referenced proceeding. Further to Procedural Order #3 issued by the Board on January 28, 2015 and amended January 30, 2015, please find enclosed Comber's interrogatories on the amended application and pre-filed evidence filed by Hydro One Networks Inc. ("HONI") on February 12, 2015. These interrogatories have been filed on RESS and served on all parties.

Yours truly,



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cc: David Hurd, Brookfield Renewable Power
David Bono, Brookfield Renewable Energy Group
Charles Keizer, Torys LLP
All Parties

COMBER WIND INTERROGATORIES TO HYDRO ONE

Interrogatory #1

Reference

- (1) Exhibit B, Tab 2, Schedule 2 - Map of Proposed Facilities
- (2) Exhibit B, Tab 2, Schedule 4 - Cross Section of the Tower Types - Existing and Proposed
- (3) Exhibit B, Tab 6, Schedule 7 - Land Matters
- (4) OEB, Decision and Order dated February 26, 2015 in Application by Suncor Energy Products Inc. for leave to construct (EB-2014-0022)

Preamble

Reference (1) shows the location of the proposed transmission line as extending north from the proposed Leamington TS to the proposed Leamington JCT. The map shows two road crossings, at County Road 14 and at County Road 8.

Reference (3) states that the proposed transmission line will cross eight municipal road allowances.

Reference (2) provides an illustration of a steel lattice tower design with a total height of 121 feet and clearance from the ground to the lowest wire of 51 feet.

Questions/Requests

- (a) Please identify all municipal roads that will be crossed by the proposed transmission line.
- (b) Please identify all existing electricity distribution lines that will be crossed by the proposed transmission line, including along the municipal roads referred to in (a), above, or otherwise, as well as the name of the owner of the line that is being crossed and any other party that has facilities attached to or running along such line pursuant to joint use arrangements.
- (c) For each existing distribution line (including attachments such as low voltage collection lines associated with renewable energy generation facilities) that will be crossed by the proposed transmission line, please identify (i) the height of the existing poles and/or conductors on the line, and (ii) the clearance between such existing poles/conductors and the lowest hanging wires on the proposed transmission line.
- (d) If Hydro One plans to use a tower design other than that provided in Reference (2) at the location of any crossing of existing distribution facilities, please provide illustrations of the relevant tower designs with relevant dimensions.

- (e) Please confirm that Hydro One's use of the tower design illustrated in Reference (2), or as otherwise indicated in response to (d), above, will result in clearances at the locations of any crossing of existing distribution facilities that are sufficient to comply with all applicable technical and safety standards, as well as to avoid adverse impacts on the distribution facilities that are being crossed. Please include references to the relevant standards in the response. Please also confirm whether the relevant standards are the same as those with which Suncor is required to comply pursuant to the Board's February 26, 2015 decision granting leave to construct in EB-2014-0022 and, if not, explain.
- (f) During construction of the proposed transmission line, will Hydro One require outages on any distribution lines that its proposed transmission line will cross? If so, what are the expected durations of such outages?
- (g) What are Hydro One's plans for scheduling and coordinating any outages referred to in (f) with directly affected parties?
- (h) Please clarify whether Hydro One will require any modifications to be made to any of the existing distribution facilities that will be crossed by the proposed transmission facilities. If so, please describe what modifications would be required.
- (i) Please explain Hydro One's position with respect to cost responsibility for the necessary modifications to existing distribution facilities referred to in (h), if any.