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March 26, 2015

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RESS AND COURIER

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

Attention: Ms. K. Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2014-0355 – Response to Board Staff Interrogatories of Suncor Energy Products Inc. ("Suncor")

We are counsel to Suncor.

Further to Order 4 of Procedural Order No. 1 in this matter, enclosed, please find Suncor's complete response to each of the interrogatories on its evidence delivered by Board staff on March 16, 2015.

Yours truly,

FOGLER, RUBINOFF LLP

Albert M. Engel

cc: C. Brett, Suncor
C. Scott, Suncor
J. Hood, Suncor
M.Kozak, 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. 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 streets and highways owned by the Corporation of the County of Lambton, all as set out in this application.

SUNCOR'S RESPONSE TO BOARD STAFF INTERROGATORIES

EB-2014-0355

March 26, 2015

SUNCOR'S RESPONSE TO BOARD STAFF INTERROGATORIES ("RESPONSE")

1 **Board Staff Interrogatory No. 1**

2 i. In accordance with Rule 23.03, has Suncor addressed the issues raised in the letter at reference
3 (a)? If so please submit related evidence.

4 Suncor requests that the response to this interrogatory be considered as fulfilling the
5 document filing requirement of Rule 23.03.

6 Suncor has been in direct contact with Execulink Telecom Inc. ("Execulink") following
7 the receipt of Execulink's Letter of Comment dated February 25, 2015. Execulink
8 provided digital files containing the location of their infrastructure within Lambton
9 County on March 9, 2015. Suncor provided Execulink with a copy of a map overlaying
10 Suncor's infrastructure on Execulink's on March 26, 2015.

11 Suncor has reviewed the information provided to Suncor and has identified that there is a
12 single location where Suncor's infrastructure crosses Execulink's infrastructure that is
13 within a County of Lambton road allowance. This crossing is located within the
14 Townsend Line road allowance near the intersection of Elarton Road and is depicted on
15 Suncor drawing 17309-0300-DD10-LYD-507.011 Rev 2 which was contained in
16 Suncor's Further Evidence filed with the Board on March 6, 2015. Execulink operates a
17 fibre optic cable or bundle of cables located on the north side of the road allowance.
18 Suncor has a 34.5 kV underground cable bundle that crosses the fibre optic cable between
19 station 5+450 and 5+500. Suncor is not anticipating that there will be any interference
20 with the Execulink fibre optic cabling in this area. As per Note 7 on the drawings,
21 Suncor's distribution line construction contractor is required to complete locates and
22 accurately determine the location of existing utilities prior to installation of Suncor's 34.5
23 kV distribution lines.

24 Suncor has provided Execulink with the names of the contractors that Suncor plans on
25 using for this project so that Execulink can take precautionary measures early in the
26 project so as to minimize disruption and cost.

27 **Board Staff Interrogatory No. 2**

28 i. Did Suncor brief the County on the extent, timing and implications of construction, installation,
29 operation, maintenance and future decommissioning of the distribution facilities within the
30 County's road allowances? If so, please submit evidence in support of same.

31 Yes, throughout negotiations of a Road Use Agreement ("RUA") between Suncor and
32 Lambton County Staff ("County Staff"), County Staff has been made fully aware of the
33 extent, timing and implications related to the distribution facilities within County road
34 allowances. Many of these details are a component of the RUA, which is currently
35 available for public review and is posted on the Lambton County website. Suncor first

36 provided County Staff with a draft of Suncor's Plan and Profile drawings dated June 13,
37 2014 ("June 13, 2014 Drawings") on June 17, 2014. As stated at Exhibit B, Tab 4,
38 Schedule 1, Page 1 of 4, Lines 6 to 10 of Suncor's Chronology of Events filed with this
39 Application on November 24, 2014, Suncor has been seeking to enter into a RUA with
40 the County since July 23, 2013.

41 ii. Please provide a complete and detailed update on the status of Suncor's discussion with the
42 County in respect of the proposed Distribution Facilities since November 20, 2014.

43 Negotiations have been held on several occasions since November 20, 2014. A RUA was
44 originally posted on the County's website on January 5, 2015 for a 30-day public review.
45 Suncor determined that four transmission poles required relocation further away from
46 County property into private land due to the existence of existing infrastructure which
47 was recently constructed. Unfortunately this change caused County Committee to halt
48 the public review process of the RUA on January 21, 2015.

49 An updated version of the RUA was posted on the County's website for a 30-day public
50 review on March 23, 2015. Suncor's understanding of the County's process is that after
51 this public review period, the RUA needs to be endorsed by County Committee and then
52 voted on by County Council prior to execution. While Suncor is prepared to continue to
53 pursue execution of the RUA, as detailed in Suncor's response to Board Staff
54 Interrogatory No. 3v. below, Suncor does not anticipate that County Council will vote in
55 favour of executing the RUA.

56 **Board Staff Interrogatory No. 3**

57 i. Can Suncor indicate whether the answers at reference (b) satisfied all of its technical concerns? If
58 so, please submit evidence of same.

59 Suncor is not aware whether its answers in reference (b) (Exhibit B, Tab 3, Schedule of
60 Suncor's Further Evidence filed on March 6, 2015) satisfied all of the County's concerns.
61 The County has served Suncor with interrogatories which Suncor will attempt to respond
62 to in accordance with the OEB's rules on March 26, 2015.

63 ii. In Suncor's view, has the County communicated all known technical concerns to Suncor to elicit
64 potential appropriate solutions?

65 The County communicated concerns in its Intervener Request Letter and March 12, 2015
66 interrogatories. Suncor answered these concerns to the best of its ability in reference (b)
67 (Exhibit B, Tab 3, Schedule of Suncor's Further Evidence filed on March 6, 2015).
68 Suncor submits that concerns communicated by the County in respect of potential future
69 construction issues as beyond the scope of this hearing, and are instead subject to the
70 *Ontario Underground Infrastructure Notification System Act, 2012* S.O. 2012, c.4
71 ("Ontario One Call") and the *ESA and TSSA Guideline for Excavation in the Vicinity of*
72 *Utility Lines* ("ESA and TSSA Guideline"), a copy of which is attached as Appendix A to
73 this Response.

- 74 iii. Please outline all known concerns related to the Distribution Facilities, technical and non-
 75 technical, that the County has communicated. Please file with the Board a detailed response on
 76 Suncor’s planned approach to resolve those concerns.

County's Concerns	Suncor's Planned Approach
Impact on County's ability to install future infrastructure in its streets and highways	County Staff requested Suncor to locate its lines below existing drains, culverts, roads or entrances at sufficient depths to permit repair/replacement. Suncor has indicated that it will directionally drill at 1.5m below the invert of culverts and 3.5m below the centreline of roads in the drawings at Exhibit B, Tab 1, Schedule 1 of Suncor's Further Evidence, filed on March 6, 2015. This limits the potential for future conflicts. Suncor has also attempted to locate its cables near property limits as requested by County Staff to ensure the cables would be out of the way of typical road construction activities.
Ability to Locate Suncor's Infrastructure	Suncor must participate in Ontario One Call and if triggered Suncor will provide a locate of its infrastructure to anyone planning excavations in the road allowance including the County.
Daylighting of existing utilities	County Staff required the inclusion of Note 7 on all drawings as shown in the drawings at Exhibit B, Tab 1, Schedule 1 of Suncor's Further Evidence, filed on March 6, 2015, to ensure that Suncor's contractors would daylight all existing utilities prior to installation.
Increased costs to County due to Suncor’s presence	Within the draft RUA, Suncor has offered compensation for staff time to administer Suncor's project. Suncor has offered payment for invasive species management. Suncor is offering payment per km and per road crossing of cable within the road allowance.

78 iv. If any of the County's technical concerns are not solvable or not within Suncor's responsibilities,
79 please highlight and provide an explanation.

80 Suncor submits that concerns communicated by the County in respect of potential future
81 construction issues as beyond the scope of this hearing, and are instead subject to the
82 *Ontario Underground Infrastructure Notification System Act, 2012 S.O. 2012, c.4*
83 (*"Ontario One Call"*) and the *ESA and TSSA Guideline for Excavation in the Vicinity of*
84 *Utility Lines* (*"ESA and TSSA Guideline"*), a copy of which is attached as Appendix A to
85 this Response.

86 v. To Suncor's knowledge, would resolution of all achievable County technical concerns lead to a
87 mutual agreement and obviate the need for the present proceeding? If not, please explain.

88 Suncor does not believe that a resolution of the County's technical concerns with County
89 Staff would obviate the need for the present proceeding. This is based on County
90 Council declaring itself an "Unwilling Host" and being unwilling to execute an RUA and
91 thus approval of the locations for distribution facilities with other proposed wind facilities
92 within the County. While Suncor may receive approval from County Staff, Suncor does
93 not believe that it will receive approval or agreement from County Council, as was the
94 case in EB-2014-0139 (Exhibit B, Tab 3, Schedule 1, Appendix D of the present
95 application filed on November 24, 2014). On page 5 of EB-2014-0139, the Board noted
96 that the "County acknowledge the existence of multiple County staff reports which
97 endorsed the signing of the RUA, but referred to them as "nothing more than the opinion
98 of certain unelected individuals". Suncor has no reason to believe that County Council
99 would act any differently in the present case.

100 **Board Staff Interrogatory No. 4**

101 i. Please provide a description and summary review of any alternative locations for the Distribution
102 Facilities within the road allowances that Suncor has considered and subsequently rejected in
103 favour of the current configuration and the reasons for having rejected those alternative(s).

104 Suncor's design goal was to attempt to utilize private property routes to connect Project
105 infrastructure so as to minimize infrastructure within County streets and highways. For
106 example, Suncor has reduced the length of cable required on Townsend Line by securing
107 land rights for a private land route. As a result Suncor informed County Staff that Suncor
108 would no longer require cables in a 825 m section of Townsend Line between Elarton
109 Road and Kinnaird Road. As a result, drawings 0507.012 to 0507.014 which were part of
110 Exhibit B, Tab 4, Schedule 1, Appendix U of the Application filed on November 24,
111 2014 are not part of the drawings at Exhibit B, Tab 1, Schedule 1 of Suncor's Further
112 Evidence, filed on March 6, 2015.

113 In the June 13, 2014 Drawings, Suncor proposed the location of cables along Lakeshore
114 Road near Hubbard Line closer to the travelled portion of the road (see drawings
115 0503.001 and 0503.002 attached as Appendix B to this Response) then depicted in
116 drawings 0503.011 and 0503.002 at Exhibit B, Tab 1, Schedule 1 of Suncor's Further

117 Evidence, filed on March 6, 2015. The County owns a significant right of way in this
118 area and Suncor relocated its cables to 1 m from the property line in this area in response
119 to a request from County Staff.

120 Suncor's engineering firm indicated their desire to design the collection trench to be
121 located within the shoulder of the road between the travelled portion of the road and the
122 ditch. This was not presented to County Staff since County Staff indicated their desire
123 that the distribution lines be as far from the travelled portion of the road as possible.

124 ii. Please provide the rationale for the final proposed locations and any supporting documentation,
125 including technical constraints.

126 The rationale for the final proposed locations in Lambton County streets and highways is
127 minimization of the use of County streets and highways as much as a possible based on
128 access to private land and existing utilities as set out in the Plan and Profile Drawings
129 located at Exhibit B, Tab 1, Schedule 1 of Suncor's Further Evidence filed March 6,
130 2015. Suncor is working with utilities to ensure existing utilities are not impacted by
131 Suncor's proposed distribution infrastructure. When considering which side of the road to
132 use Suncor reviewed existing tree locations and utility locations. Suncor also will be
133 directionally drilling beneath all existing municipal drains and existing private entrances
134 within the road allowance to minimize disruption. As stated in the Application, the
135 proposed locations reflect the best balance of environmental, social, technical and
136 economic considerations.

137 **Board Staff Interrogatory No. 5**

138 i. Did the County provide any comments on the drawings filed in Suncor's supplemental evidence?
139 If so, please submit a copy of these comments, and if applicable, please submit evidence showing
140 how any concerns have been addressed by Suncor.

141 Suncor has not received any comments on the drawings filed in Suncor's supplemental
142 evidence (Plan and Profile Drawings located at Exhibit B, Tab 1, Schedule 1 of Suncor's
143 Further Evidence filed March 6, 2015).

144 ii. Has the County proposed locations for the distribution facilities within the road allowances? If so,
145 please provide such proposals and indicate whether Suncor accepted, rejected or altered the
146 proposal and all supporting rationale.

147 Other than as described in the answer to Board Staff Interrogatory No. 4i., the County has
148 not proposed locations for the distribution facilities.

149 iii. If any agreement on individual locations related to drawings at reference (a) has been reached,
150 please submit this information to the Board.

151 While Suncor has worked with County Staff to determine mutually agreeable locations of
152 the distribution facilities, the locations have not been agreed upon by resolution of
153 County Committee or the full County Council.

APPENDIX A



**Electrical
Safety
Authority**



Guideline for Excavation in the Vicinity of Utility Lines

Ontario Regulation 210/01 Oil and Gas Pipeline Systems

Ontario Regulation 22/04 Electrical Distribution Safety

December 2008

Legal Disclaimer.

This document contains GUIDELINES ONLY to assist members of the industry in interpreting:

- Ontario Regulation 22/04 - Electrical Distribution Safety - made under subsection 113(1) of Part VIII of the Electricity Act, 1998
- Ontario Regulation 210/01 – Oil And Gas Pipeline Systems – made under the Technical Standards and Safety Act, 2000

These guidelines do not have the force of law. Where there is a conflict between these guidelines and any legislation or regulation which may apply, the relevant law prevails.

Retention Periods stated in the guidelines set out the minimum period for which referenced documents are to be retained. Each distributor needs to make its own assessment of the appropriate retention period for specific documents based on its assessment of risk factors and potential liability.

Definitions

Abandoned utility lines means those *utility lines* that have been identified by the *utility* in the *locate* as abandoned.

Blanket Locate or Alternate Locate Agreement means permission to excavate, subject to the terms and conditions outlined by a written agreement between the *Contractor* or *Excavator* and the *utility*.

Boundary Limits means the volume of soil contained by vertical planes placed 1.0 metre each side of the centre line of the marked *utility line* or 1.0 metre on either side of the marked limits of the underground structure.

Contractor or Excavator means the individual, partnership, corporation, public agency, or other entity that digs, bores, trenches, grades, excavates or breaks ground with mechanical equipment or explosives in the vicinity of a *utility line*.

Hand dig means to excavate using a shovel with a wooden or insulated handle, not including picks, bars, stakes or other earth piercing devices. Please note that Regulations requiring a *locate* include hand digging applications.

Hydrovac means the use of pressurized water or compressed air to loosen soil and a vacuum system to remove it.

Live means:

- a) electrically connected to a source of voltage difference or electrically charged so as to have a voltage different from that of the earth,
- b) connected to a source of fuel under the *Technical Standards and Safety Act, 2000*.

Locate means identification on the ground of the position of the *utility line(s)* based on records or electronic locating equipment and includes provision of necessary documentation such as a locate sheet.

Mechanical Excavation means boring or open cut excavation by means of mechanical excavating equipment such as powered excavator, earth mover, earth piercing equipment including hand held augers, picks, bars, stakes or any other device that may damage the *utility line*. Please note that Regulations requiring a locate include hand digging applications.

Utility means the individual, partnership, corporation, public agency, or other entity that is licensed to operate an electric distribution system under the *Ontario Energy Board Act* or a pipeline under the *Technical Standards and Safety Act, 2000*.

Utility line means those facilities operated by a *utility* through which gas or electric energy is conveyed and includes pipe, cables, and other directly related equipment and components such as switches, valves, meters and supporting structures.

1.0 General Conditions

- 1.1 All work shall be carried out in accordance with:
- (a) The *Occupational Health and Safety Act* (OH&S) and Regulations which apply under this Act including Regulations for Construction Projects; and
 - (b) as appropriate,
 - (i) the *Technical Standards and Safety Act, 2000* and Ontario Regulation 210/01 Oil and Gas Pipeline System and other regulations which apply under this Act; and / or
 - (ii) the *Electricity Act, 1998* and the Ontario Regulation 22/04 Electrical Distribution Safety Regulation and other regulations which apply under this Act.
- 1.2 The guidelines, procedures and requirements described herein are prepared in the interest of safety to the general public, the workers carrying out the excavation, and the prevention of damage to *utility lines* and property.
- 1.3 The *Excavator* shall assume that all *utility lines* are *live* unless otherwise expressly identified by the *utility* on the *locate*.

2.0 Locate Request

- 2.1 Prior to excavation the person responsible for the work shall contact “Ontario One Call” at the telephone or facsimile numbers listed in Table 1 below, or the *utility*, and request a *locate* of *utility lines* in the areas where excavation will be taking place. The *Excavator* must receive the *locate* as described in Section 3.0 prior to commencing any excavation.

Table 1:

Ontario One Call	
Telephone	1-800-400-2255
Fax	1-800-400-8876

Note: Not all *utilities* belong to Ontario One Call. If you are planning to excavate in an area not serviced by Ontario One Call please contact the local municipality for information on *utilities* in that area and contact the *utility* directly for *locate* requests.

- 2.2 Subject to entering into an agreement with an *Excavator*, the *utility* may provide that *Excavator* with a *blanket locate*.
- 2.3 If removing asphalt but not road base or underlying structure a *locate* is not required.
Note: *Locates* are required for sidewalk removal.
- 2.4 The *Excavator*, when requesting a locate, shall provide the *utility* with relevant information describing the location where the work will take place, the expected time when the work will begin, the scope of the work, the nature of the work, the expected duration, the name address and telephone number of the *Excavator*, and the name of the *Excavator's* site representative.
- 2.5 Except in emergency situations, requests for stakeouts or *locate* information should be made as early as possible, and at least 5 working days in advance.
- 2.6 Except in cases of emergency, or where the response for the *locate* request has been agreed with the *Excavator*, the *utility* shall make every reasonable effort to respond to notification requests and provide *locates* within 4 working days of receiving the notification, and 5 working days during peak times.
- 2.7 In emergency situations, requests for *locate* information shall be provided by the *utility* as soon as possible.

3.0 Locates

- 3.1 The *utility* shall provide information using labeled stakes, flags, and/or highly visible paint marks (See section 11.0 for colour code) continuously or at regular intervals on the surface of the ground. The markings should clearly indicate the centre line of the *utility line* and the limits of underground structures, where applicable, in the defined area of the proposed excavation.
- 3.2 The *utility* shall also provide a diagram describing the *locate* information to the person who requested the *locate* or when requested to the *Contractor's* site representative at the time of the *locate*. The diagram should indicate in clear legible terms the *locate* information including additional clarifications, dimensions from fixed objects, orientation, and any unusual depths, if known.
- 3.3 When requested by either party, the *utility* and the *Excavator* shall meet on site to confirm details of the excavation and the location of the *utility line*.
- 3.4 Where there are no *utility lines* in the defined area of the proposed excavation the *utility* may provide verbal confirmation to the *Excavator*. Written confirmation will be provided on request.

4.0 Locate Boundaries and Accuracy

- 4.1 The *Excavator* shall not excavate outside the area covered by the *locate* request without first obtaining a further *locate*.
- 4.2 *Locate* accuracy shall be considered to be 1 metre on either side of the surface centre line *locate* or 1 metre on either side of the marked limits of the underground structure, unless the *locate* instructions specifically indicate other *boundary limits*.
- 4.3 Irrespective of the depth of the *utility line*, the *Excavator* must not use mechanical excavating equipment to dig within the *boundary limits* to expose the *utility line*.

5.0 Duration

- 5.1 The *utility* shall indicate the expiry date (normally 30 days) on the *locate* form or diagram and the *utility* contact phone number.
- 5.2 Stakes or markings may disappear or be displaced. *Excavators* shall not rely on expired *locates*. Where delays occur beyond the period specified in 5.1 or where the *locate* markings become unclear, a new *locate* must be requested by the *Excavator*.
- 5.3 Where the *utility* has ascertained that no changes have taken place since releasing the *locate* information and the *locate* markings are still clear, the *utility* may provide a new expiry date in writing.

6.0 Hydrovac Excavation

- 6.1 With prior agreement of the *utility*, *hydrovac* may be used as an alternative to *hand digging*.
- 6.2 For detailed procedures for using *hydrovac* excavation in the vicinity of pipelines see Appendix 5.
- 6.3 For detailed procedures for using *hydrovac* excavation in the vicinity of electric distribution lines see the E&USA Safe Practice Guide “*Excavating with Hydrovacs in the Vicinity of Underground Electrical Plant*”

7.0 Initial Exposure

- 7.1 At no time, with the exception of 2.3, should an *Excavator* use *mechanical excavation* within the *boundary limits* of the *locate* without first *hand digging* test holes to determine the exact centre line and depth of cover of the *utility line*.
- 7.2 Where the proposed excavation is to be parallel and within the *boundary limits* of a *utility line*, the *Excavator* shall expose the *utility line* by *hand digging* a series of test holes along the entire route at regular intervals. The separation between test holes shall not exceed 4.5 metres.
- 7.3 Test holes may be excavated by one of the following methods:
- (a) *mechanical excavation* may be used to dig test holes immediately outside of the *boundary limits* and then *hand digging* used laterally until the *utility line* is found; or
 - (b) A combination of *hand digging* and *mechanical excavation* as follows:
 - (i) *hand digging* between the *boundary limits* of the *locate* in cuts of at least 0.3 metre (1 foot) in depth,
 - (ii) *mechanical excavation* could then be used to widen the hand dug trench to within 0.3 metre (1 foot) of the depth of the *hand digging*,
 - (iii) repeat step (i) and (ii) until the *utility line* is located.
- 7.4
- (a) Concrete saws, jackhammers, hand tools or other similar equipment may be used to break concrete or asphalt on a road or sidewalk surface.
 - (b) With the exception of 2.3 and 7.3, mechanical excavating equipment should only be used to remove broken asphalt or concrete.
 - (c) Concrete below the road and sidewalk surface layers may have *utility lines* encased therein and should not be removed without consultation with the *utility*.
- 7.5 The *Excavator* shall dig additional test holes where the *utility* has identified changes in alignment or in elevation.
- 7.6 Where the *utility line* cannot be located following the procedures described above, the *Excavator* shall contact the *utility* for assistance with the *locate*.

8.0 Excavating After Test Holes Are Completed

- 8.1 Where test holes in an area have been completed and the *utility line* located, *mechanical excavation* may take place provided the following procedures are used:
- (a) wherever possible, mechanical excavating equipment should be operated parallel to the direction of the *utility line* when the excavation is within 1 metre of the *utility line*; and
 - (b) *mechanical excavation* must not be used closer than 0.3 metre (1 foot) in any direction to the *utility line*;
 - (c) excavation within 0.3 metre (1 foot) in any direction of the *utility line* must be carried out by *hand digging*;
- 8.2 Prior to initiating any blasting activities in proximity of *utility lines* *Excavators* must obtain specific guidelines from the *utilities*.
- 8.3 Specific instructions for *utility lines* needing support must be obtained from the *utilities*. The *Excavator* will install temporary support acceptable to the *utilities* that is adequate to prevent any deflection or damage to the *utility line*. (for an electric utility sample see Appendix 4).
- 8.4 Temporary support shall remain in place until the backfill material underneath the structure has cured or it has been compacted adequately to restore support.
- 8.5 Under no circumstances shall an *Excavator* attempt to move *utility lines*. Where such a need arises during excavation, the *Excavator* shall contact the *utilities* to make the necessary arrangements.

9.0 Backfilling Trenches

- 9.1 Where trenches are to be backfilled, the following requirements should be followed:
- (a) backfilling should be performed in such a manner as to provide firm support under the *utility lines*; and
 - (b) the trench must be backfilled with clean fill or granular material free of material injurious to the *utility lines*
 - (c) where flooding of gas *utility* trenches is done to consolidate the backfill, care must be exercised so that the gas line is not floated from its firm bearing on the ditch bottom.
 - (d) backfilling should be performed without using tamping equipment directly on exposed *utility lines* and using extra caution around electric cable splices.









10.0 Unidentified and Abandoned Distribution Lines

- 10.1 Where a *utility line* is found during excavation that was not identified by the *utility*, but within the area covered by the *locate*, the *Excavator* shall never assume the line is an abandoned *utility line*. The *Excavator* shall immediately contact the *utility* as appropriate, to determine if the line is abandoned or *live*.
- 10.2 Excavations in the vicinity of *abandoned utility lines* shall not be subject to the guidelines in Section 8.0.

Note: In circumstances where a *locate* shows an abandoned utility line the *utility* should clearly state on the *locate* form that the *utility line* is abandoned.

11.0 Colour Coding

Markings on stakes, streets and sidewalks must be “Safety Yellow” for gas lines and highly visible “Safety Red” paint for electric distribution lines

COLOUR		TYPE OF FACILITY/INDICATOR	MUNSELL NOTATIONS
Red		Electric - Powerlines, Cables, Conduit & Lighting cables	(Safety Red 7.5R 4.0/14)
Yellow		Gas, Oil, Steam, Petroleum, Compressed air, Gases and other hazardous liquid or gaseous materials	(Safety Yellow 5.0Y 8.0/12)
Blue		Potable water	(Safety Blue 2.5PB 3.5/10)
Orange		Communications - Alarm, Cable TV, Signal lines, Cables & Conduit	(Safety Orange 5.0YR 6.0/15)
Green		Sewers & Drain lines	(Safety Green 7.5G 4.0/9)
Purple		Reclaimed/treated water, Irrigation & Slurry lines	
Pink		Temporary survey markers	
White		Proposed excavation	

12.0 Procedure When Damage Occurs

- 12.1 If damage to the *utility line* occurs, including damage to the coating, the *Excavator* shall leave the *utility line* exposed, barricade the area and contact the *utility* immediately.
- 12.2 If gas is escaping from a gas pipeline, shut off vehicles or equipment, remove or extinguish all ignition sources, barricade the area off, and keep public and workers away. Call 911 and the Gas *utility* immediately. No attempt should be made to control the escaping gas.
- 12.3 If there are any flames or sparks originating from the exposed electric distribution line or other works, barricade the area off, and keep public and workers away. Call 911 and the Local Electric Distribution *utility* immediately.

Note: In no case shall the *Excavator* attempt to control or make repairs to the damaged *utility line* or equipment.

13.0 Acts and Regulations

A copy of the relevant sections of Acts and Regulations are attached as appendices.

Appendix 1: The *Technical Standards and Safety Act, 2000* and the *Ontario Regulation 210/01 Oil and Gas Pipeline Systems*.

Appendix 2: The *Ontario Energy Board Act*

Appendix 3: *Ontario Regulation 22/04 "Electrical Distribution Safety"*.

Appendix 4: Guideline for Temporary Support of Electric Distribution Lines across the Trench

Appendix 5: Procedures for using hydro-excavation machines in the vicinity of Pipelines.

Appendix 1

Sections of the *Technical Standards and Safety Act*:

Offences

37. (1) Every person who,
- (a) contravenes or fails to comply with any provision of this Act, the regulations or a Minister's order;
 - (b) knowingly makes a false statement or furnishes false information under this Act, the regulations or a Minister's order;
 - (c) contravenes or fails to comply with a term or condition of an authorization;
 - (d) contravenes or fails to comply with an order or requirement of an inspector or obstructs an inspector,

is guilty of an offence and on conviction is liable to a fine of not more than \$50,000 or to imprisonment for a term of not more than one year, or to both, or, if the person is a body corporate, to a fine of not more than \$1,000,000. 2000, c. 16, s. 37 (1).

Duty of director or officer

- (2) Every director or officer of a body corporate has a duty to take all reasonable care to prevent the body corporate from committing an offence under subsection (1). 2000, c. 16, s. 37 (2).

Offence

- (3) Every director or officer of the body corporate who has a duty under subsection (2) and who fails to carry out that duty is guilty of an offence and on conviction is liable to a fine of not more than \$50,000 or to imprisonment for a term of not more than one year, or to both. 2000, c. 16, s. 37 (3).

Separate offence

- (4) Where a person contravenes any of the provisions of this Act, the regulations, a Minister's order or any notice or order made under them on more than one day, the continuance of the contravention on each day shall be deemed to constitute a separate offence. 2000, c. 16, s. 37 (4).

Administrative penalty

- (5) A person against whom an administrative penalty has been levied by a designated administrative authority or, in the absence of such authority, by the Minister does not preclude a person from being charged with, and convicted of, an offence under this Act for the same matter. 2000, c. 16, s. 37 (5).

Time limit

- (6) No proceeding in respect of an alleged offence under this Act may be commenced after two years following the date on which the facts that gave rise to the alleged offence were discovered. 2000, c. 16, s. 37 (6).
- 41.** Every contractor and employer shall take all reasonable precautions to ensure that they and their agents and employees comply with this Act, the regulations or a Minister's order.

Sections of the Oil and Gas Pipeline Systems Regulation:

Ascertaining pipeline locations

- 9.** (1) No person shall dig, bore, trench, grade, excavate or break ground with mechanical equipment or explosives without first ascertaining from the licence holder the location of any pipeline that may be interfered with.
- (2) The licence holder shall provide as accurate information as possible on the location of any pipeline within a reasonable time in all the circumstances.

No interference with pipeline

- 10.** No person shall interfere with or damage any pipeline without authority to do so.

Appendix 2

Ontario Energy Board Act, Section V

Requirement to hold licence

57. Neither the OPA nor the Smart Metering Entity shall exercise their powers or perform their duties under the Electricity Act, 1998 unless licensed to do so under this Part and no other person shall, unless licensed to do so under this Part,

- (a) own or operate a distribution system;
- (b) own or operate a transmission system;
- (c) generate electricity or provide ancillary services for sale through the IESO-administered markets or directly to another person;
- (d) retail electricity;
- (e) purchase electricity or ancillary services in the IESO-administered markets or directly from a generator;
- (f) sell electricity or ancillary services through the IESO-administered markets or directly to another person, other than a consumer;
- (g) direct the operation of transmission systems in Ontario;
- (h) operate the market established by the market rules; or
- (i) engage in an activity prescribed by the regulations that relates to electricity. 1998, c. 15, Sched. B, s. 57; 2002, c. 1, Sched. B, s. 6; 2004, c. 23, Sched. B, s. 10; 2006, c. 3, Sched. C, s. 4.

Emergency

59. (1) Despite this Act, the Board may issue an interim licence authorizing a person to undertake any of the activities described in section 57 if the Board considers it necessary to do so to ensure the reliable supply of electricity to consumers. 1998, c. 15, Sched. B, s. 59 (1).

Appendix 3

Ontario Regulation 22/04, “Electrical Distribution Safety”

Section 10 Proximity to Distribution Lines

- (1) Despite section 4 of CSA Standard C22.3, No. 1-01 Overhead Systems, a person may place an object closer to an energized conductor forming part of a system of overhead distribution lines than the required minimum separations from energized conductors forming part of such a system if the person first obtains an authorization from the distributor responsible for the energized conductor. O. Reg. 22/04, s. 10 (1).
- (2) Despite sections 4 and 5 of CSA Standard C22.3, No. 7-94 Underground Systems (Reaffirmed 1999), a person may place an object closer to an energized conductor forming part of a system of distribution lines than the required minimum separations from energized conductors forming part of such system if the person first obtains an authorization from the distributor responsible for the energized conductor. O. Reg. 22/04, s. 10 (2).
- (3) Before digging, boring, trenching, grading, excavating or breaking ground with tools, mechanical equipment or explosives, a Excavator, owner or occupant of land, buildings or premises shall, in the interests of safety, ascertain from the distributor responsible for the distribution of electricity to the land, building or premises the location of any distribution line that may be interfered with in the course of such activities. O. Reg. 22/04, s. 10 (3).
- (4) The distributor shall provide reasonable information with respect to the location of its distribution lines and associated plant within a reasonable time. O. Reg. 22/04, s. 10 (4).

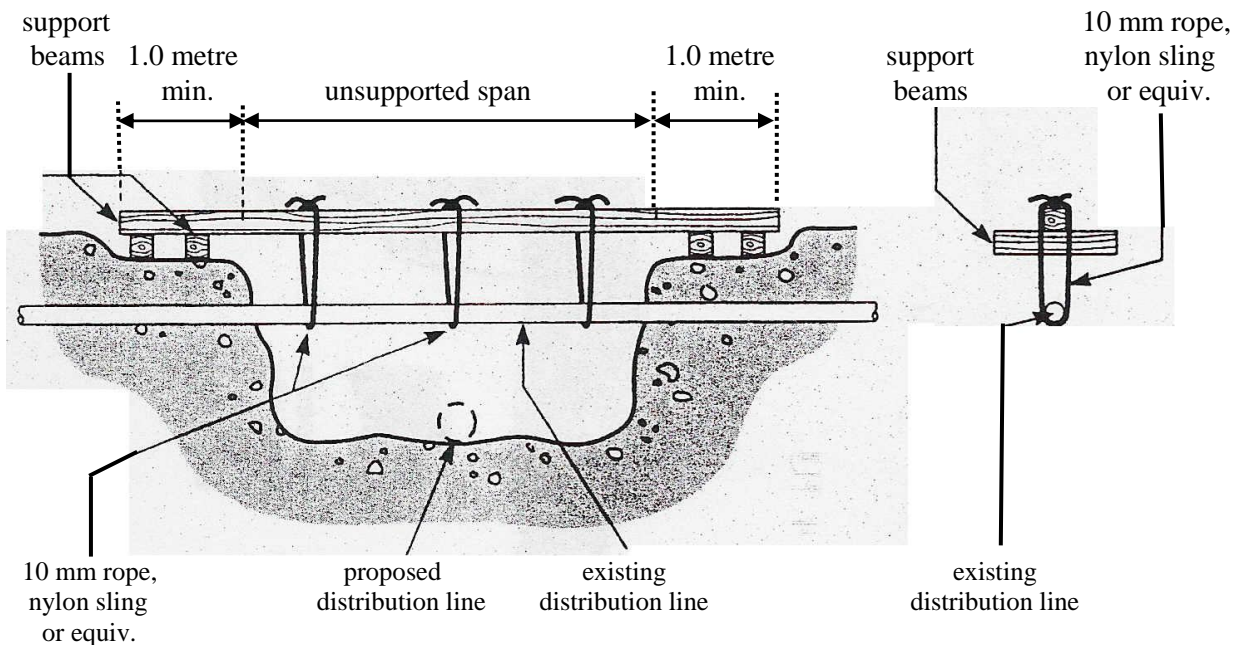
Note: Section 10 came into force on November 11, 2004.

Appendix 4

Guideline for Temporary Support of Electric Distribution Lines across the Trench

1. When trenching beneath underground conduit systems a temporary support may be required to prevent deflection and damage to the electric distribution line.
2. Prior to trenching beneath the electric distribution line the Excavator is to install a temporary support if the unsupported span of conduit in the trench exceeds 1.0 meter in length. However, a support with closer spacing intervals may be required as identified below.

TYPICAL TEMPORARY SUPPORT OF EXISTING ELECTRIC DISTRIBUTION LINE CROSSING EXCAVATION



From EUSA Handbook for Excavation near Electrical Cables

3. **Concrete Encased PVC, Transite, or Fibre Conduit** must not be underexposed without adequate support. When temporary support is required, support beams and posts shall be placed in a manner that will prevent damage to the conduit and eliminate sag. The maximum span that the conduit is permitted to be supported in this manner is 2.0 metres and the spacing between supports shall not exceed 1.0 metre. The Excavator is to contact the distributor for special instructions if the distribution line is to be underexposed by more than 2.0 metres or if the conduit cross-section dimensions exceed 1.5 metres by 1.5 metres.

4. **Concrete Encased Clay Tile Conduit** must be supported at short-spaced intervals. Since the conduit can be damaged very easily, exposed conduit should be inspected by the distributor's representative when uncovered and again before backfilling. The maximum span that the conduit is permitted to be supported in this manner is 2.0 metres and the spacing between supports shall not exceed 0.6 metres. The Excavator is to contact the distributor for special instructions if the distribution line is to be underexposed by more than 2.0 metres or if the conduit cross-section dimensions exceed 1.5 metres by 1.5 metres.
5. **High Density Polyethylene (HDPE) and Direct Buried PVC Duct** are very flexible and must be continually supported with a set of pressure treated timbers consisting of 50 mm x 150 mm planks nailed together in a "V" formation. These timbers shall be placed under the cable and supported every 2.0 metres with vertical 100 mm x 100 mm timbers with a "V" notch at the top to hold the 50 mm x 150 mm planks in place. The conduit bundles must not be separated or displaced.
6. Support is required when a trench is parallel to a distribution line and soil rupture or lateral movement of the soil may undermine the distribution line.
7. Table #1 shows the maximum allowed horizontal distances from the edge of the trench to the distribution line affected by the excavation. Shoring may be already in place if workers are to enter a trench excavation that is deeper than 1.2 metres.
8. In case the distributor's structure is closer than the maximum allowed distances given in Table 1, then the excavation shall be suitably shored to prevent movement of the conduit structure. The shoring shall remain in place until the backfill material has restored support. A sliding trench box does not provide adequate support.
9. Where the trench bottom is below the water table, the trench shall be suitably shored with close sheathing.

TABLE #1
Maximum Allowed Horizontal Distances from
Distribution Line to Edge of Unshored Excavation

Proposed Trench Depth (m)	Horizontal Distance Type 1 and 2 Soils Hard, Dry, Stiff (m)	Horizontal Distance Type 3 and 4 Soils Wet, Soft, Clay, or Sand (m)
Up to 1.2	0.6	0.6
Up to 2.4	1.0	1.0
Up to 3.6	1.0	2.0
Up to 4.5	1.5	3.0
Over 4.5	2.0	4.0

Appendix 5

Procedures for using hydro-excavation machines to locate and expose pipelines as an alternative to hand digging.

Please note that this applies to pipelines only.

For hydrovac excavation in the vicinity of electric distribution lines see the E&USA Safe Practice Guide “*Excavating with Hydrovacs in the Vicinity of Underground Electrical Plant*”

The following procedures shall be followed at all times when excavating with hydro-excavation technology within 1 m of gas plants.

1. Obtain locates prior to commencement of work. Only a competent, qualified worker shall operate hydro-excavation equipment.
2. The maximum water pressure to be used at any time with a straight tip nozzle¹ during excavation in public roads or easements shall be 17250 kPa (2500 psi). Below a depth of 45 cm (18”) the water pressure to be used at any time with a straight tip nozzle¹ during excavation shall be reduced to a maximum of 10350 kPa (1500 psi). All pressure measurements are to be taken at the hydro-excavation machine (truck, pump).
3. The maximum water pressure to be used at any time with a spinning tip nozzle² during excavation shall be 20684 kPa (3000 psi). When a spinning tip nozzle² is used, pressure measurements are to be permanently monitored using a calibrated device mounted on either the hydro-excavation machine (truck, pump) or the wand.
4. The wand shall never remain motionless during excavation. Aiming directly at the plant shall be avoided at all times.
5. A distance of 20 cm (8”) shall be maintained between the end of the pressure wand nozzle and the plant and / or subsoil. The nozzle shall never be inserted into the subsoil while excavating above the plant.
6. Only use hydro-excavation equipment and nozzles that have been specifically designed for use above buried gas lines or other reasonably expected underground gas plant.
7. A device capable of stopping the excavation on demand, such as a dead man trigger or valve, shall be installed on the wand.

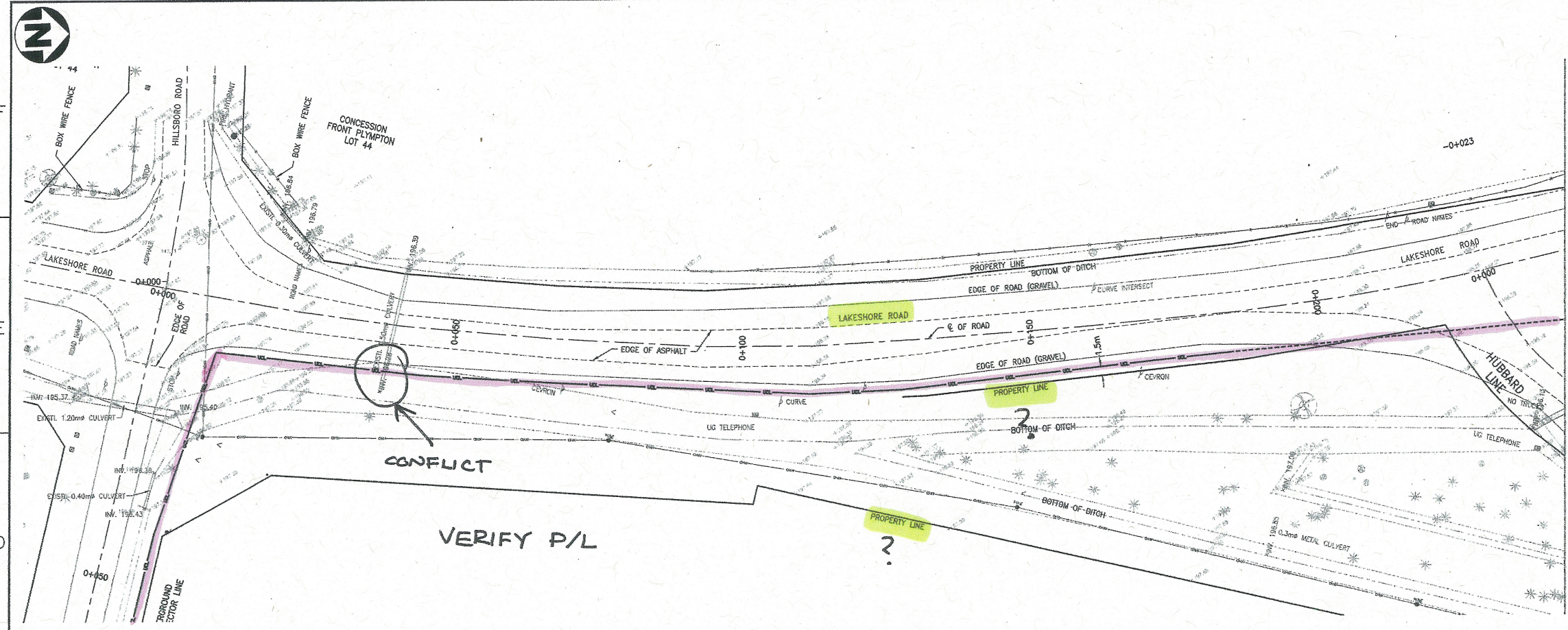
8. If heated water is used during excavation, the temperature and pressure of the water shall never exceed 115 oF (45 oC) and 17250 kPa (2500 psi) respectively.
9. If damage to gas plant occurs while using hydro-excavation technology or any other method of excavation, the excavator shall contact the gas utility.

Notes:

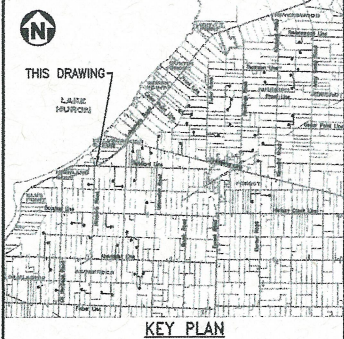
1) Straight Tip Nozzle – A straight tip nozzle is a single orifice fitting that can be inserted into the end of the wand used with a hydro-excavation machine such that there is a single concentrated jet of water exiting from the tip of the nozzle.

2) Spinning Tip Nozzles – A spinning tip nozzle consists of a conically shaped housing that contains a single exit port (to facilitate the flow of liquid) as well as a rotor insert. The rotor insert has a series of blades such that when liquid is flowing through the nozzle, the rotor is forced to spin around the longitudinal axis of the the nozzle. The rotor insert also contains three or more channels that force liquid to flow in different pathways through the rotor insert to the tip of the rotor which, as a result of the high pressure liquid is forced into contact with the nozzle housing. The liquid flowing through the nozzle is dispersed through the tip of the nozzle housing in a conical shape, having an angle of not less than 20o.

APPENDIX B



UNDERGROUND COLLECTOR LINE - PLAN
SCALE: 1:400

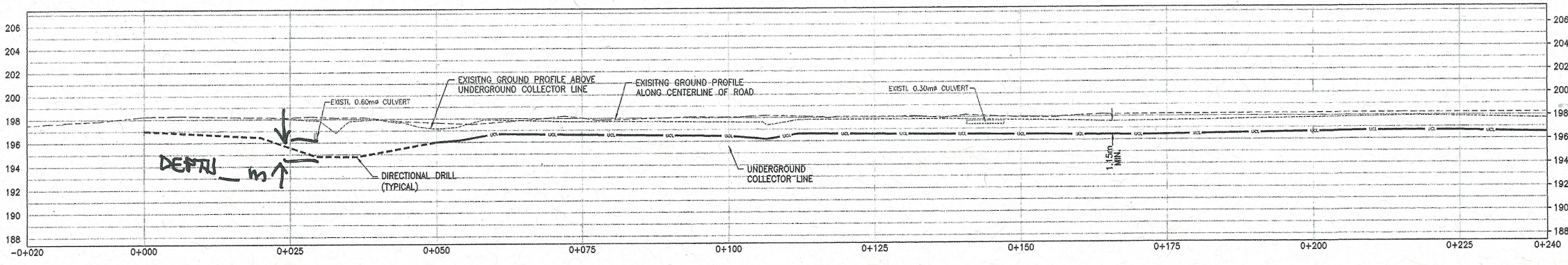


- NOTES**
- COORDINATES SHOWN ON THIS DRAWING ARE BASED ON UTM NAD 83, ZONE 17.
 - ALL COORDINATES, DIMENSIONS, AND ELEVATIONS ARE IN METRES, UNLESS NOTED OTHERWISE.
 - FOR COVER PAGE AND LIST OF DRAWINGS, SEE DRAWING 173709-0300-DD10-LYD-0500.001.
 - FOR GENERAL NOTES AND DETAILS, SEE DRAWING 173709-0300-DD10-DTL-0207.001.
 - FOR UNDERGROUND COLLECTOR LINE LAYOUT AND TRENCH DETAILS, SEE DRAWINGS 173709-0300-DF00-LYD-XXXX.001 AND 173709-0300-DF00-DTL-XXXX.001.
 - THE POSITION OF POLE LINES, CONDUITS, WATERMAIN, SEWERS AND OTHER UNDERGROUND AND ABOVEGROUND UTILITIES AND STRUCTURES ARE NOT NECESSARILY SHOWN ON THE CONTRACT DRAWINGS, AND WHERE SHOWN, THE ACCURACY OF THE POSITION OF SUCH UTILITIES AND STRUCTURES IS NOT GUARANTEED.
 - BEFORE STARTING WORK, THE CONTRACTOR SHALL CONFIRM THE EXACT LOCATION OF ALL UTILITIES AND STRUCTURES AND SHALL ASSUME ALL LIABILITY FOR DAMAGES TO THEM.

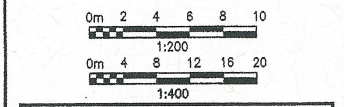
LEGEND

---	GAS LINE	---	OVERHEAD HYDRO LINE
---	SANITARY SEWER	---	WATERMETER
---	STORM SEWER	---	BELL LINE
---	WATERMETER	---	UNDERGROUND COLLECTOR LINE IN PRIVATE PROPERTY
---	BELL LINE	---	UNDERGROUND COLLECTOR LINE IN MUNICIPAL ROW
---	UNDERGROUND COLLECTOR LINE IN PRIVATE PROPERTY	---	DIRECTIONAL DRILL PATH
---	UNDERGROUND COLLECTOR LINE IN MUNICIPAL ROW		
---	DIRECTIONAL DRILL PATH		

(CB)	CATCH BASIN	(WS)	WATER SHUT OFF
(CO)	CLEAN OUT	(GM)	GAS METER
(WSO)	WATER SHUTOFF	(GV)	GAS VALVE
(F/C)	FACE OF CURB	(HM)	HYDRO METER
(T/C)	TOP OF CURB	(TP)	TELEPHONE PEDESTAL
(M)	MANHOLE	(S)	SIGN
(MH)	MANHOLE	(TM)	TESTHOLE
(EH)	ELECTRICAL HANDHOLE	(BM)	BENCH MARK
(CB)	CATCH BASIN	(TM)	TRAFFIC MANHOLE
(IB)	IRON BAR	(WM)	WATER MANHOLE
(G)	GAS	(WP)	WATER METER
(OP)	GUARD POST	(W)	WATER MANHOLE
(OPE)	OVERHEAD ELECTRICAL	(W)	WATER MANHOLE
(V)	WATER METER	(EP)	EXISTING POLE
(PA)	POLE ANCHOR	(GW)	GUY WIRE
(FH)	FIRE HYDRANT	(G)	GUARD POST
(CL)	CENTER LINE	(I)	INVERT
(EG)	EDGE OF GRAVEL	(B)	BOTTOM OF CURB
(EC)	EXISTING CULVERT	(W)	WATER METER
(HM)	HYDRO MANHOLE		
(SM)	SEWER MANHOLE		
X 250.00	EXISTING GROUND ELEVATION		



UNDERGROUND COLLECTOR LINE - PROFILE
SCALE: 1:400 (HORIZONTAL), 1:200 (VERTICAL)

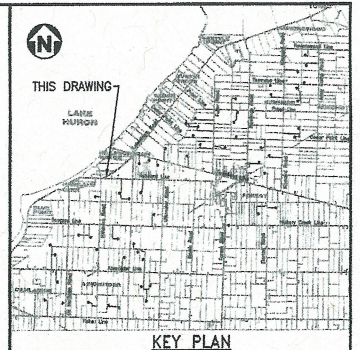
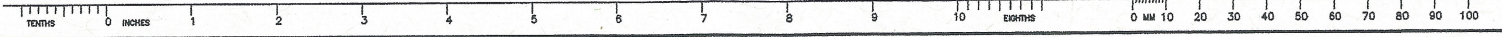


NOT TO BE USED FOR CONSTRUCTION

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CLIENT DWG. NO.			
DRAWING NO.	173709-0300-DD10-LYD-0503.001	REV.	C

REV	DDMMYY	REVISION / ISSUE DESCRIPTION	DRN	CHK	APP	APP	APP	APP	APP	APP	REV	DDMMYY	REVISION / ISSUE DESCRIPTION	DRN	CHK	APP	APP	APP	APP	APP	APP	REFERENCES
C	13JUN2014	ISSUED FOR BID	MG	MH	PP	GA																
B	11JUN2014	ISSUED FOR SOUND CHECK	MG	MH	PP	GA																
A	28APR2014	ISSUED FOR INFORMATION	MG	MH	PP	GA																

STAMP/SEAL			APPROVED FOR		
			CLIENT PROJECT MGR.	DEPARTMENT MGR.	PROJECT MGR.
			PROJECT PHASE		
PROJECT NO.	ACTIVITY NO.	BY	DDMMYY	SUBJECT	
173709		DES	PP	03FEB2014	UNDERGROUND COLLECTOR LINE LAYOUT PLAN
SCALE	PACKAGE CODE	DRN	MG	03FEB2014	LAKESHORE ROAD
AS SHOWN		CHK	MH	03FEB2014	STATION 0+000.0 TO 0+245.0
		APP	MU	03FEB2014	



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 - SANITARY SEWER
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 - UNDERGROUND COLLECTOR LINE IN PRIVATE PROPERTY
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 - - - DIRECTIONAL DRILL PATH
 - (CB) CATCH BASIN
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 - (WSO) WATER SHUTOFF
 - (F/C) FACE OF CURB
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 - (M) MANHOLE
 - (MH) MANHOLE
 - (EH) ELECTRICAL HANDHOLE
 - (CATCH) CATCH BASIN
 - (IB) IRON BAR
 - (G) GAS
 - (GP) GUARD POST
 - (OP) OVERHEAD ELECTRICAL
 - (V) WATER METER
 - (F) FIRE HYDRANT
 - (CL) CENTER LINE
 - (EG) EDGE OF GRAVEL
 - (EXIST) EXISTING CULVERT
 - (HY) HYDRO MANHOLE
 - (S) SEWER MANHOLE
 - (X) EXISTING GROUND ELEVATION
 - 800 WATER SHUT OFF
 - (G) GAS METER
 - (G) GAS VALVE
 - (H) HYDRO METER
 - (P) TELEPHONE PEDESTAL
 - (S) SIGN
 - (T) TESTHOLE
 - (B) BENCH MARK
 - (T) TELEPHONE MANHOLE
 - (W) WATER MANHOLE
 - (P) POLE EXISTING POLE
 - (G) GUARD POST
 - (I) INVERT
 - (B) BOTTOM OF CURB
 - (W) WATER METER

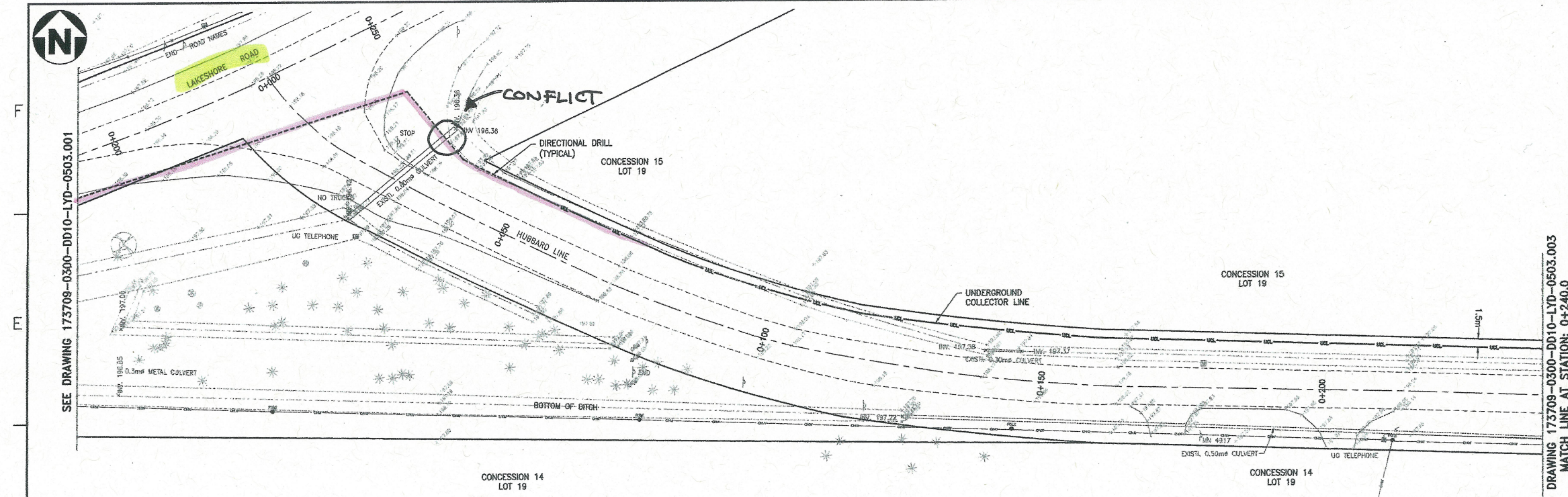
NOT TO BE USED FOR CONSTRUCTION

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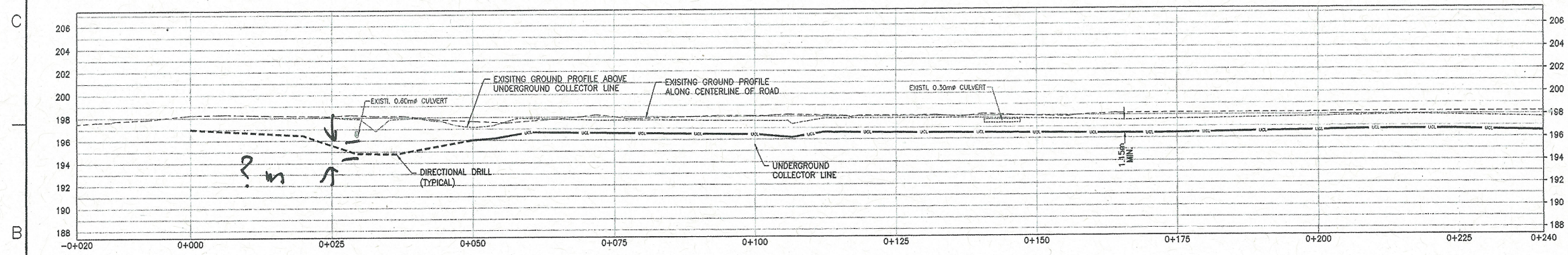
SUNCOR ENERGY

AREA 0300
SUNCOR ENERGY CEDAR POINT II WIND POWER PROJECT

CLIENT DWG. NO.
DRAWING NO. 173709-0300-DD10-LYD-0503.002



UNDERGROUND COLLECTOR LINE - PLAN
SCALE : 1:400



UNDERGROUND COLLECTOR LINE - PROFILE
SCALE : 1:400 (HORIZONTAL), 1:200 (VERTICAL)

REV	DATE	DESCRIPTION	DRN	CHK	APP	APP	APP	APP	APP
C	13/08/2014	ISSUED FOR BID	MC	MI	PP	GA			
B	31/08/2014	ISSUED FOR SOUND CHECK	MC	MI	PP	GA			
A	28/09/2014	ISSUED FOR INFORMATION	MC	MI	PP	GA			

REV	DATE	DESCRIPTION	DRN	CHK	APP	APP	APP	APP	APP

STAMP/SEAL

PRELIMINARY

APPROVED FOR

CLIENT PROJECT MGR.	DEPARTMENT MGR.	PROJECT MGR.
PROJECT PHASE		

PROJECT NO.	ACTIVITY NO.	BY	DATE
173709		PP	03/08/2014
SCALE	PACKAGE CODE	CHK	DATE
AS SHOWN		MI	03/08/2014
		MU	03/08/2014

SUBJECT
UNDERGROUND COLLECTOR LINE LAYOUT PLAN & PROFILE HUBBARD LINE STATION 0+000.0 TO 0+240.0