

March 30, 2015

RESS, EMAIL & 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: Hydro One Networks Inc. Application for Leave to Construct Transmission Facilities in the Windsor-Essex Region (EB-2013-0421) - Submissions of Comber Wind LP

We are counsel to Comber Wind LP ("Comber"), intervenor in the above-referenced proceeding. In accordance with Procedural Order No. 3, please find attached two copies of Comber's submissions. These submissions have been filed on RESS and served on all parties.

Yours truly,



Jonathan Myers

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

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

AND IN THE MATTER OF an application by Hydro One Networks Inc. for an order or orders pursuant to section 92 of the *Ontario Energy Board Act, 1998* (as amended) granting leave to construct transmission line facilities in the Windsor- Essex Region, Ontario.

SUBMISSION OF COMBER WIND LP

These are the submissions of Comber Wind LP (“Comber”) in respect of the application by Hydro One Networks Inc. (“Hydro One”) to the Ontario Energy Board (the “Board”) for leave to construct new transmission facilities in the Windsor-Essex Region of southwestern Ontario, namely Hydro One’s Supply to Essex County Transmission Reinforcement Project. In particular, these submissions are in respect of Phase 1 of the hearing, as described in Procedural Order No. 3.

Comber owns and operates a 166 MW wind energy generation facility in Essex County. The facility includes a 34.5 kV overhead collection system that conveys power from each of the turbines to a project substation, which is in turn connected to the IESO-controlled grid. Portions of Comber’s collection system run along existing Hydro One distribution poles pursuant to joint use arrangements. As indicated in Hydro One’s response to Comber Interrogatory #1(b), Hydro One’s proposed transmission line route will cross Comber’s existing collection system in two locations - along South Middle Road and at a point approximately 1.4 km north of Highway 77.¹

Although Hydro One’s pre-filed evidence does not describe the particulars of its transmission facility design in the vicinity of these crossings and the dimensions shown on the proposed tower design filed at Exhibit B, Tab 2, Schedule 4 do not appear to provide for sufficient clearances from existing facilities, in response to Comber Interrogatory No. 1 Hydro One has clarified:

- that the heights of poles and conductors will be determined at the detailed design stage based on a survey of existing poles and conductors along the transmission line route;

¹ In fact, the relevant point is approximately 1.4 km north of County Road 8. Highway 77 does not run along County Road 8 west of the Town of Staples.

- that the proposed transmission line will be designed to maintain Hydro One's standard clearances between the lowest hanging wire on the proposed line and the distribution/collection poles and conductors, which standards are generally more stringent than CSA 22.3;
- that Hydro One will inform affected parties of any planned transmission tower design changes;
- that Hydro One does not foresee the need for any modifications to existing distribution facilities at this time;
- that if any modifications to existing distribution/collection facilities are required, Hydro One as the proponent of the transmission line construction project would be responsible for the relevant costs consistent with the Board's decision in EB-2014-0022; and
- that any distribution/collection line outages that may be needed for purposes of constructing the proposed transmission facilities will be determined in conjunction with the owner and/or operator of the relevant facilities and will be planned and staged so as to minimize the impacts of the outages to the affected parties.

In its Argument-in-Chief, Hydro One reiterated its intention to consult with interested parties during the design and construction phases and to apply its standard clearances.

Based on the commitments made by Hydro One through its interrogatory responses and Argument-in-Chief, as summarized herein, Comber is satisfied that its concerns with respect to the potential impacts of the proposed transmission facilities on Comber's generation facilities, including its collection system, have been and will continue to be appropriately considered and addressed by Hydro One. Comber therefore requests that the Board's Order expressly require Hydro One to fulfill the commitments it has made with respect to the matters herein described.

All of which is respectfully submitted this 30th day of March, 2015.

COMBER WIND LP

By its counsel
Torys LLP



Jonathan Myers