

Hydro One Networks Inc.

7th Floor, South Tower
483 Bay Street
Toronto, Ontario M5G 2P5
www.HydroOne.com

Tel: (416) 345-5393
Fax: (416) 345-6833
Joanne.Richardson@HydroOne.com

Joanne Richardson

Director – Major Projects and Partnerships
Regulatory Affairs



BY COURIER

April 2, 2015

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Suite 2700, 2300 Yonge Street
P.O. Box 2319
Toronto, ON
M4P 1E4

Dear Ms. Walli:

EB-2013-0421 – Hydro One Networks' Section 92 Phase 1 – Supply to Essex County Transmission Reinforcement Project – Reply Argument

In accordance with Procedural Order 3 in this proceeding dated January 28, 2015 and in response to the submissions of Board Staff and Comber Wind LP, please find attached two paper copies of Hydro One Networks Inc.'s Reply Argument related to Phase 1 of this Application.

An electronic copy of this Reply Argument has been filed using the Board's Regulatory Electronic Submission System (RESS) and the proof of successful submission is attached.

Sincerely,

ORIGINAL SIGNED BY JOANNE RICHARDSON

Joanne Richardson

c/ EB-2013-0421 Phase 1 Intervenors (electronic only)

ONTARIO ENERGY BOARD

IN THE MATTER OF *the Ontario Energy Board Act, 1998*;

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 granting leave to construct transmission line facilities

**REPLY OF HYDRO ONE NETWORKS INC. TO THE SUBMISSIONS
OF BOARD STAFF AND COMBER WIND LP.**

Hydro One Networks Inc. (“Hydro One”) makes these reply submissions in accordance with the Board’s Procedural Order No. 3 dated January 28, 2015. Hydro One received written submissions from Board Staff and from Comber Wind LP (dated March 30, 2015).

REPLY TO BOARD STAFF SUBMISSION

Board Staff’s submission addressed the elements of Hydro One’s application. Hydro One has no concerns with Board Staff’s submission except for the proposed condition on land matters. Hydro One rejects Board Staff’s recommendation that the OEB’s approval should be conditional upon Hydro One obtaining all permanent and temporary land rights and easements¹.

Hydro One submits, in accordance with the Filing Requirements for Electricity Transmission Applications² and with Section 97 of the *Ontario Energy Board Act, 1998*, that Hydro One has provided the Board with the land-related forms³ that Hydro One has offered, or will offer, to each owner of land affected by the Project.

¹ EB-2013-0421, Board Staff Submission, Page 6, March 30, 2015

² Filing Requirements for Transmission Applications, Chapter 4, Section 4.4.5.5, Page 25, July 31, 2014

³ EB-2013-0421, Hydro One Pre-filed Evidence, Exhibit B, Tab 6, Schedule 7, Attachments 1-4

In practice, Hydro One does not enter lands nor conducts any preliminary examinations of the lands that are necessary for fixing the site for the proposed Project until leave of the Board has been granted. Applying such a condition would limit Hydro One's ability to appropriately plan, commence, and segment project work as may be necessary to ensure an appropriate in-service date is achieved for the Project. As such, Hydro One submits that making leave of the Board conditional on Hydro One obtaining all permanent and temporary land rights and easements is impractical and contrary to Board Filing Requirements and earlier Board Decisions.

To satisfy the concerns of Board Staff, Hydro One proposes that it will, as it has in accordance with similar previous Board Decisions⁴, obtain and comply with all necessary approvals, permits, licences, certificates and easement rights required to construct, operate and maintain the Project, and will provide copies of all such written approvals, permits, licences and certificates upon the Board's request.

REPLY TO COMBER WIND LP

Hydro One has no objections to the comments submitted by Comber Wind LP.

Conclusion

Hydro One submits that Hydro One and the OPA (now IESO) have provided clear and substantial evidence establishing the need for the Project and demonstrating that the SECTR Project is the preferred solution for addressing these needs. Hydro One believes that the SECTR Project is in the public interest and should be approved as filed.

All of which is respectfully submitted for the Board's consideration.

⁴ Decisions and Order in EB-2009-0078, EB-2012-0082, EB-2013-0053, Conditions of Approval, General Requirements, Section 1.7