

Hydro One Networks Inc.

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LAW

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April 7, 2016

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

Dear Ms Walli:

Re: EB-2016-0013-- Application by Union Gas Limited for leave to construct natural gas pipelines and ancillary facilities in the Municipality of Leamington

Further to my telephone conversation earlier this afternoon with Board Staff counsel Michael Millar, Hydro One Networks Inc. ("Hydro One") requests an adjournment of the April 12th oral hearing in the above-noted matter and further requests the Board's leave to file written evidence and to introduce a witness panel to provide oral evidence at the hearing.

Hydro One will be able to file its evidence no later than Thursday, April 14.

The Union Gas ("Applicant") responses to Hydro One's interrogatories have clarified that the Applicant and Hydro One are not in agreement on the facts in this proceeding and that cross-examination of the Applicant's witness panel will be insufficient to inform the Board regarding a number of items that the Board will need to consider and evaluate in order to render a decision. In addition, a number of salient facts cannot be introduced by means of cross-examination of the Applicant's witness panel

The written evidence that Hydro One intends to file next week, and the oral evidence that will be provided at the hearing by Hydro One's witnesses, will address the following matters:

1. Evidence setting out the transmission line route (and notification of affected parties, public meetings, etc.) that was accepted by the Ministry of the Environment in 2010 as a result of the environmental assessment process commenced by Hydro One earlier that year.
2. Evidence setting out the transmission line route and costs that were approved by the Ontario Energy Board in the section 92 application for leave to construct, commenced by Hydro One in January of 2014, for which leave to construct was granted by the Board in July of 2015.

3. Evidence concerning Canadian Standards Association guidelines as to separation between gas lines and electricity transmission structures and evidence on safety concerns if recommended separation distances are not maintained.
4. Evidence concerning steps to be taken, additional parties to be notified, additional public meetings to be held, and time delays involved in, the reopening of Hydro One's environmental assessment approval from the Ministry of the Environment, if the Board grants leave to Union Gas to build its proposed pipeline in the location now proposed by Union Gas.
5. Evidence concerning steps to be taken, additional parties to be notified, estimates of increased costs, and time delays involved in, the reopening and amendment of Hydro One's s. 92 leave granted by the Board, if the Board grants leave to Union Gas to build its proposed pipelines in the location now proposed by Union Gas.
6. Estimates of the total additional costs that would be visited upon electricity ratepayers as a result of the delays and increased costs attributable to the facts disclosed by items 4 and 5 above.
7. Evidence disputing the Applicant's evidence that the Applicant and Hydro One mutually agreed that Hydro One would move its 230 kV transmission line, notwithstanding the fact that the location of the transmission had already received environmental assessment approval from the Ministry of the Environment and s. 92 leave from the Board.
8. Evidence of Hydro One's notification of the Applicant concerning the exact routing of the Hydro One transmission line, prior to the Applicant's application to the Municipality for easements for its proposed gas pipeline.

Hydro One thanks the Board for its consideration of this request for a brief adjournment of the oral hearing, and Hydro One respectfully submits that the additional evidence to be provided will assist the Board in its goal of protecting the interests of gas and electricity consumers with respect to prices and, given the safety concerns where gas and electricity lines are co-located, the interests of gas and electricity consumers with respect to reliability.

Yours very truly,

ORIGINAL SIGNED BY MICHAEL ENGELBERG

Michael Engelberg

cc: Union Gas Limited
Ontario Greenhouse Vegetable Growers
Michael Millar, Board Staff Counsel