



December 9, 2016

Ontario Energy Board
2300 Yonge Street, 27th Floor
P.O. Box 2319
Toronto, ON M4P 1E4
Attention: Ms. K. Walli, Board Secretary

Dear Ms. Walli:

**Re: Request for Temporary Exemption from 6.5.3 Distribution System Code
(Long-Term Load Transfer Elimination)**

On October 2, 2015, Halton Hills Hydro Inc. ("HHHI") submitted its 2016 Cost of Service Rate Application ("2016 COS"), EB-2015-0074. The 2016 COS included a detailed Distribution System Plan ("DSP"). In the Ontario Energy Board approved DSP, HHHI stated in Section 3.1.7 on page 90:

"Halton Hills Hydro has been working with the Region of Peel, Region of Halton, and Hydro One Brampton Networks Inc. with respect to road improvements on Winston Churchill Blvd. The road improvements will require relocation of both utilities infrastructure for which Halton Hills Hydro and Hydro One Brampton Networks Inc. are jointly designing a pole line which both utilities will cohabitate and in doing so achieve cost savings. At present, Halton Regions plans with respect to road improvements will include significant changes in the area of Winston Churchill Blvd and 10 Side Road where Halton Hills Hydro presently is anticipating relocation of all its infrastructure to accommodate the road improvements. The utility has been corresponding with the Region of Peel's design firm who advises they expect utility relocations to begin in 2018. As such Halton Hills Hydro has included this system access project in that year."

HHHI is requesting a temporary exemption from section 6.5.3 of the Distribution System Code (long term load transfer elimination) in respect of thirty-two (32) customers affected by the planned system access project listed in the Table on page 88 in HHHI's DSP as "Winston Churchill Blvd. (5 Side Rd to Mayfield Rd)", until such time as the construction of the joint pole line is completed. Current approvals to construct the joint pole line are dependent upon two (2) Regional governments (Region of Halton and Region of Peel). To date, significant resources and costs have been incurred by the Region of Peel, Region of Halton, Hydro One Brampton Networks Inc., HHHI and additional third parties for the planning and design of the construction of this joint pole line.

The Ontario Energy Board indicated during proceeding EB-2015-0006 that the long-term load transfer eliminations should minimize the impacts on the load transfer customers and avoid unnecessary costs being

imposed on consumers due to uneconomic distribution system expansion for the sole purpose of connecting load transfer customers. The Winston Churchill Blvd. (5 Side Rd to Mayfield Rd) project is a required project that was approved by the Ontario Energy Board as part of HHHI's 2016 COS DSP and thus, there is no need for the approval of incremental costs outside the previously approved DSP.

HHHI is proceeding with other long-term load transfer eliminations in co-operation with Hydro One Networks Inc. and Milton Hydro Distribution Inc.

HHHI looks forward to the expected positive response from the Ontario Energy Board.

Sincerely,

(Original signed)

Arthur A. Skidmore, CPA, CMA
President and CEO
Halton Hills Hydro Inc.