To:
Kirsten Walli
Board Secretary
Ontario Energy Board
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To Ms. Walli:

Herein are our comments of the "Staff Discussion Paper on Stray Voltage" that the Ontario Energy Board released in May 2008.

Sincerely,

Ross and Darlene Brindley

First, the Investigative Process: We believe that if the direct cause of the farm stray voltage cannot be determined by the local investigator (who should have some working knowledge as to how a farm animal would react "normally" vs when the animal is under duress) that there should be a Qualified Electrical Engineer available to pursue the matter more completely. Another reason a Qualified Electrical Engineer should be brought in, is to determine when an "isolation device" is put on, that the stray voltage is not then coming onto the farm via the ground rods along the road or from another source. We believe that this is the best source of investigative processes, as the farmer has already suffered monetary loss due to the lower farm production and higher labour costs for animal handling and increased expenditures related to maintaining animal health and well being.

If once the initial investigation is done and found that the distributor was **not** responsible and it is proven it is **not** an "on-farm source", but a third-party entity **is** the source; fixing the farm stray voltage should continue, but the information should be automatically passed onto the Ministry of Environment for investigation and possible charges.

Also, in the discussion paper (section 5.4.6) about compensation for losses. Farming has taken a lot of "expensive hits" to keep up with today's technology and regulations (i.e. Clean Water Act, Environmental Standards, Dead Stock Rules, BSE problems, and Nutrient Management Act, to name a few). Farmers utilize a lot of their working capital and any extra money, to produce quality safe and humanely handled food for Canadian families. If the farm stray voltage was produced by the farmer- the farmer should have to pay to fix it. But if it is being imposed/forced onto the farm than, we feel, the entity,

which is the source of the stray voltage should be required to: **1.)** pay the cost of fixing the stray voltage and **2.)** have to compensate the farmer for the financial/physical losses endured. Not to mention, the emotional well being of the farmers involved on the affected farm. Farmers are close to their animals, and have a rapport with them. When they continually see the animals in duress or dying, the emotional well being of the farmer and perhaps that farm family can be greatly harmed.

Also, the safety standard for NEV in Ontario being 10 volts, in our opinion is unacceptably high. With the provided research materials and with the views of the veterinarians participating in this "discussion paper", it should be obvious that this standard is outdated and needs to be revised for the safety and health of the livestock in Ontario.

Issue #2, Given the above statement we believe that the Option of "1mA ACC or 0.5 V ACV if the distributor's contribution to stray voltage is the action threshold" is the best choice.

Issue #3, We feel, that the Ontario Energy Board should apply the "numerical threshold" to all livestock farms regardless of species. Why should one species be prejudiced over another because they have a higher threshold? How does one know if an old bank barn turning from feeder pigs to beef cattle or another animal crop? To simplify the procedure and limit the confusion this could bring, we hope that the Board recognizes the benefit of a "blanket" threshold for all Ontario farms.

Issue #4, By using a Board-approved procedure you assure the Ontario Landowners that every case of Stray Voltage will have the same testing and attention spent on it as another farm. It also makes gathering information and a comparison studies between farms easier for the researchers and investigators.

Issue #5, Distributors should be responsible for identifying sources of stray voltage either on- or- off farm. Distributors already have, at the farm, the equipment, knowledge, and personnel available to complete the required testing, at that point. This is where the availability of an Qualified Electrical Engineer would be useful as, if it is not coming from on-farm or from the distributor, they (the E.E.) can read the testing and prescribe what other tests can be done to figure out where the source of the stray voltage is coming from. (**This is to prove the actual source of the stray voltage**)

Issue #6 and #7 and #8, There should be specialized training recommended to distributors however, "extensive" specialized training should not be required because an Electrical Engineer would be available for those investigators encountering severe cases. However, there should be established minimum training standards for all investigators so all investigators have the same basic training and methods to be used. (By having an established training standard it ensures that if for some unknown reason a different investigator had to take over a case, they would be able to follow the testing protocols.) As the investigators become more knowledgeable and trained with stray voltage and they

have a minimum number of farms (i.e. 50) that they have dealt with, then they should be sent for more "specialized" training and complete a training course that would allow them to be recognized as a "Certified" Investigator.

Issue #9, We feel that by prescribing a customer response procedure would be fair enough for the distributors as, it was mentioned, that delays could be created because of all the formal paperwork required.

Issue #10, We feel that by having specialized forms filled out with all pertinent information, but kept at the area distribution office, that if satisfactory results are not obtained in a specific period of time (say a month or two), then we (the farmer) can go to the OEB to request a review of our file for new actions to be taken.

Issue #11, Installing an isolation device as a standard remediation approach where testing reveals a stray voltage problem exists, is a good idea. But the investigator does need to know where the **source of the stray voltage is coming from** to correct the problem, so that the stray voltage does not affect other farms in the area.

Issue #12, It is only fair that the consumer (the farmer) should be able to access any information pertaining to his/her farm. This should include, testing data, any recorded data taken on the farm, and any remedies that has been tried or is being considered.

Thank you for allowing us to participate with written comments on these suggested alternative approaches, related implementation issues, and the need for supporting regulatory elements.

Ross and Darlene Brindley