



*Providing electricity distribution excellence in a safe and reliable manner*

April 5, 2021

Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
P.O. Box 2319  
Toronto, ON M4P 1E4  
Attention: Ms. I. Kuznetsova

Dear Ms. Kuznetsova:

**Re: Request for Temporary Exemption from 6.5.3 Distribution System Code  
(Long-Term Load Transfer Elimination)  
OEB Proceeding No. EB-2020-0300**

Halton Hills Hydro Inc. (“HHHI”) requested and received an exemption from 6.5.3 of the Distribution System Code related to a Long Term Load Transfer arrangement with Alectra Utilities, successor to Hydro One Brampton Networks Inc. In its Decision and Order dated June 15, 2017, the Ontario Energy Board (“OEB”) allowed the exemption until December 31, 2020 or until Halton Hills Hydro Inc. had physically connected the customers, whichever is earlier.

HHHI requested an additional exemption extension on December 11, 2020. The OEB approved a further extension to June 30, 2021.

On March 4, 2021, HHHI received an email request for additional information regarding EB-2020-0300. Please find the responses to the addition information request attached as Appendix A.

Should there be any further questions or concerns, please contact Regulatory Affairs, [RegulatoryAffairs@haltonhillshydro.com](mailto:RegulatoryAffairs@haltonhillshydro.com) or (519) 853-3700 extension 257.

Sincerely,

*Tracy Rehberg Rawlingson*

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



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## APPENDIX A

On March 4, 2021, HHHI received an email request for additional information regarding EB-2020-0300. Please find the responses to the addition information request below.

1. Please provide detailed reasons for the project to be delayed. Please explain what actions have been taken by Halton Hills Hydro Inc. to ensure the project completion within timelines provided to the OEB during EB-2016-0366 exemption proceeding, where you have submitted that "...the municipal project began in 2013, and negotiations between the regional municipalities and with landowners have been ongoing since then. The portion of work relating to the 33 load transfer customers; namely, hydro pole relocations, is expected to be completed in 2019".

This project is municipally driven and both Alectra and HHHI are reliant on the timelines of the Municipalities. It is in the best interest of the rate payers and those customers living on Winston Churchill Boulevard that HHHI and Alectra wait for the Municipalities to go ahead with the project rather than build the infrastructure and then need to move again upon the Municipalities going forward with the road work.

2. Please outline the scope of work that is required to be completed for Halton Hills Hydro Inc. to connect 33 load transfer customers currently physically supplied by Alectra Utilities.

The scope of work required to be completed by HHHI and Alectra includes:

- a. Alectra/ HHHI complete designs and receive approval from Regions of Peel and Halton;
  - i. HHHI/ Alectra jointly undertake design work with an understand Alectra takes the lead on the main pole line, HHHI takes Alectra's design from which HHHI prepares relocations.
  - ii. HHHI/ Alectra complete (i) and provide drawings to the Region of Peel.
  - iii. Designs not final, need Region of Peel's approval.
- b. Region of Peel to undertake land acquisitions by purchase or expropriation. Usually takes approximately one (1) year to complete.
- c. Purchase orders are issued by Region of Peel to both utilities;
- d. Poles and anchors are staked, utilities agree to division of work;
  - i. Determine cost share between LDC's not covered by Region (ie: 50/50 material, 50/50 of remaining labour and equipment not covered by Region cost share which loosely translates to 25% of labour and equipment costs for each LDC).
- e. Poles and framing are installed (roughly 1-year of construction, e - i);
- f. Wires are strung;
- g. HHHI installation of transformers & guying/ anchoring;
- h. HHHI lashing of secondary cables to neutral to create spun buss;
- i. HHHI switches services to new transformers/ buss;
- j. Third party transfers.
- k. Old infrastructure removed.
- l. Mapping updated.



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Historically, for a project of this size, design and acquisition of land rights could take upwards of two (2) years once the Municipalities decide to go forward. An additional year would be required for the actual build.

3. Please provide the date for the temporary exemption to be in place and provide reasons.

Given the length of time required for this project and the Environmental Assessment currently ongoing related to a Ministry of Transport proceeding, it would be expected that a temporary exemption for five (5) years would be required.