



November 26, 2021

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

Dear Ms. Long:

Re: Service Area Amendment Application for Halton Hills Hydro Inc. and Alectra Utilities Corporation

Please find attached a Service Area Amendment (“SAA”) application for Halton Hills Hydro Inc. (“HHHI”) with a letter of consent provided by Alectra Utilities Corporation (“Alectra”).

HHHI submits that there will be no adverse impacts on existing customers, and therefore ask that the Board dispose of the proceeding without a hearing under Section 21(4)(b) of the *Ontario Energy Board Act, 1998*.

The application has been prepared in accordance with the Board’s Filing Requirements for Service Area Amendment Applications dated March 12, 2007. Alectra has granted permission for HHHI to proceed with filing the enclosed Service Area Amendment.

In the event of any additional information, questions or concerns, please contact Tracy Rehberg-Rawlingson, Regulatory Affairs Officer, at tracyr@haltonhillshydro.com or (519) 853-3700 extension 257.

Sincerely,

Scott Knapman
President and CEO, HHHI

Cc: David J. Smelsky, CFO, HHHI
Tracy Rehberg-Rawlingson, Regulatory Affairs Officer, HHHI
Chris Hale, Engineering Supervisor, HHHI
Michael Lister, Acting VP Regulatory Affairs and Compliance, Alectra
Vitalika Quenville, Manager, Regulatory Affairs and Compliance, Alectra
Brian Hewson, Vice President, Consumer Protection & Industry Performance, OEB
Ryan Holder, Manager, Industry Policy and Compliance, OEB

**Service Area Amendment Application
Halton Hills Hydro Inc.**

November 26, 2021

7.0 INTRODUCTION

This application for a Service Area Amendment is structured and follows the minimum filing requirement for SAA assigned by the Ontario Energy Board. The section numbers follow the filing requirement of the base reference.

This Application is structured to follow the Filing Requirements for Service Area Amendments as specified by the OEB in Chapter 7 of the Filing Requirements for Transmission and Distribution Applications (the “Filing Requirements”). The section numbering follows that of the Filing Requirements.

This Application for a service area amendment (“SAA”) addresses an amendment to Halton Hills Hydro Inc.’s (“HHHI”) service territory for the purpose of connecting a customer who is geographically located within the service area of Alectra Utilities Corporation (“Alectra”) and adjacent to the service territory of HHHI. This Application affects one (1) new General Service customer.

HHHI hereby applies to the Ontario Energy Board (“OEB”) for an Order or Orders to amend Schedule 1 of its Electricity Distribution License (ED-2002-0552) by including the lands described at Section 7.1.3 to this Application, and to amend Schedule 1 of Alectra’s Electricity Distribution License (ED-2016-0360) to exclude the same lands from the Brampton Rate Zone.

7.1 BASIC FACTS

GENERAL

7.1.1 (a)

***Provide the contact information for the applicant
Contact information includes the name, postal address, telephone number, and, where available, the email address and fax number of the person***

Applicant:

Halton Hills Hydro Inc.
43 Alice St
Halton Hills (Acton), ON
L7J 2A9

Contact: Tracy Rehberg-Rawlingson
tracyr@haltonhillshydro.com
Phone: (905) 853-3700 ext. 257

7.1.1 (b)

***Provide the contact information for the incumbent distributor
Contact information includes the name, postal address, telephone number, and, where available, the email address and fax number of the person***

Incumbent Distributor:

Alectra Utilities Corporation
2185 Derry Road West
Mississauga, ON
L5N 7A6

Contact: Michael Lister
Michael.Lister@alecrautilities.com
Phone: (905) 798-8242

7.1.1 (c)

***Provide every affected customer, landowner, and developer in the area that is the subject of the SAA Application
Contact information includes the name, postal address, telephone number, and, where available, the email address and fax number of the person***

Signum Wireless is the only affected customer.

Signum Wireless
70 East Beaver Creek, Unit 22
Richmond Hill, Ontario
L4B 3B2

Contact: Fernando Araújo
Vice President of Operations
905-806-7524
Fernando.araujo@signumwireless.com

7.1.1 (d) & (e)

Provide any alternate distributor other than the applicant and the incumbent distributor, if there are any alternate distributors bordering on the area that is the subject of the SAA application; and any representative of the persons listed above including, but not limited to, a legal representative

There are no other distributors bordering on the area that is the subject of this SAA application.

7.1.2 REASONS FOR APPROVAL OF THIS AMENDMENT

Indicate the reasons why this amendment should occur and identify any load transfers eliminated by the proposed SAA.

The Customer that is the subject of this Application is within the service area of Alectra, though HHHI is able to connect this customer to their distribution system at a lesser cost due to proximity of existing distribution assets to the customer's geographic location.

HHHI and Alectra agree that HHHI should service this customer. Alectra has provided its consent to HHHI to file this service area amendment application and proceed with connection of this customer, as documented in a letter of consent (provided as Attachment A).

Approval of this SAA application would not result in an increase in rates for either HHHI or Alectra's existing customers. No load transfers are created or removed by the proposed service area amendment.

DESCRIPTION OF PROPOSED SERVICE AREA

7.1.3

Provide a detailed description of the lands that are the subject of the SAA application. For SAA applications dealing with individual customers, the description of the lands should include the lot number, the concession number, and the municipal address of the lands. The address should include the street number, municipality and/or county, and postal code of the lands.

For SAA applications dealing with general expansion areas, the description of the lands should include the lot number and the concession number of the lands, if available, as well as a clear description of the boundaries of the area (including relevant geographical and geophysical features).

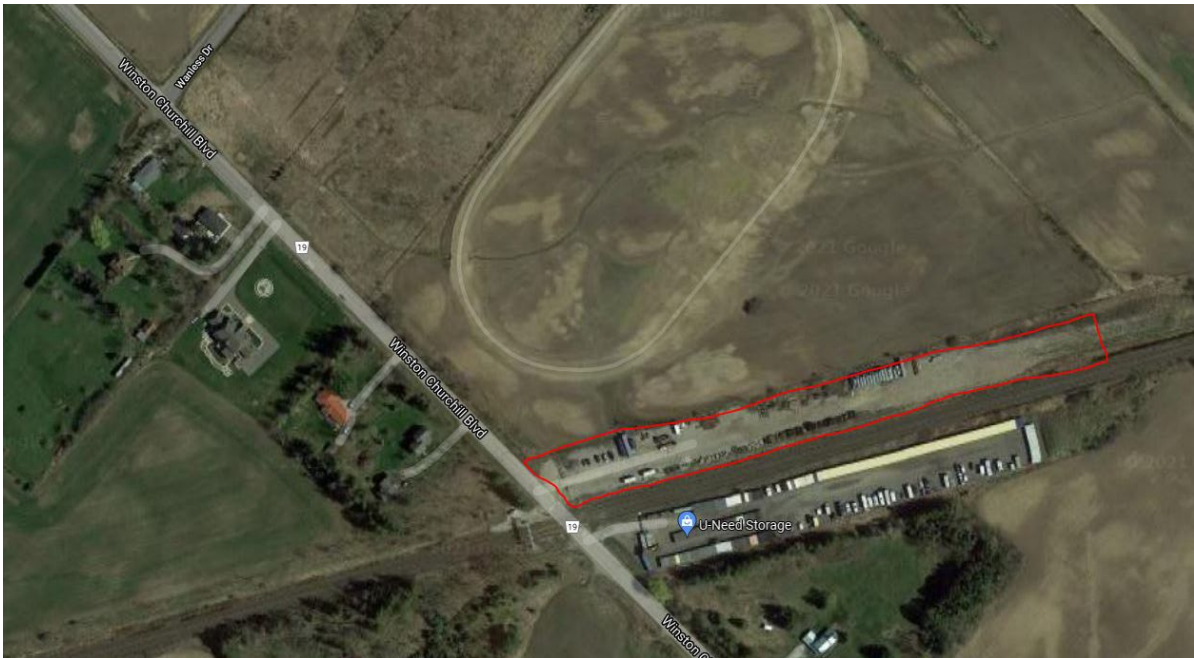
The land that is subject to this SAA application is municipal address 10884 Winston Churchill Blvd, Brampton, Ontario, with postal code L7G 4S7. The land is located on the east side of Winston Churchill Blvd in the City of Brampton. The service is to an antenna tower located on a parcel of land owned and used

by Canadian National Railway (“CNR”) for storage. The land is bordered by a CNR rail to the south and farm fields to the north and east.

The legal property description is PT LT 13 CON 6 WHS CHINGUACOUSY BEING RAILWAY AS IN OMT49698; PT LT 14CON 6 WHS CHINGUACOUSY AS IN CH30043, OMT49698; PT LT 15 CON 6 CHINGUACOUSY AS IN CP8; BRAMPTON; S/T CH23702 being all of PIN 14362-0063 (LT).

Figure 1 below shows the location of the CNR storage yard.

Figure 1 – location of CNR storage yard – 10884 Winston Churchill Blvd.



ALECTRA and HHHI Licence Amendments

Alectra Utilities Corporation (ED-2016-0360)

Licence ED-2016-0360, last amended March 31, 2021 and with the exclusion of 10884 Winston Churchill Blvd. to Schedule 1.

Halton Hills Hydro Inc. (ED-2002-0552)

Licence ED-2002-0552, last amended October 18, 2021 and with the inclusion of 10884 Winston Churchill Blvd. to Schedule 1.

7.1.4

Provide one or more maps or diagrams of the area that is the subject of the SAA application.

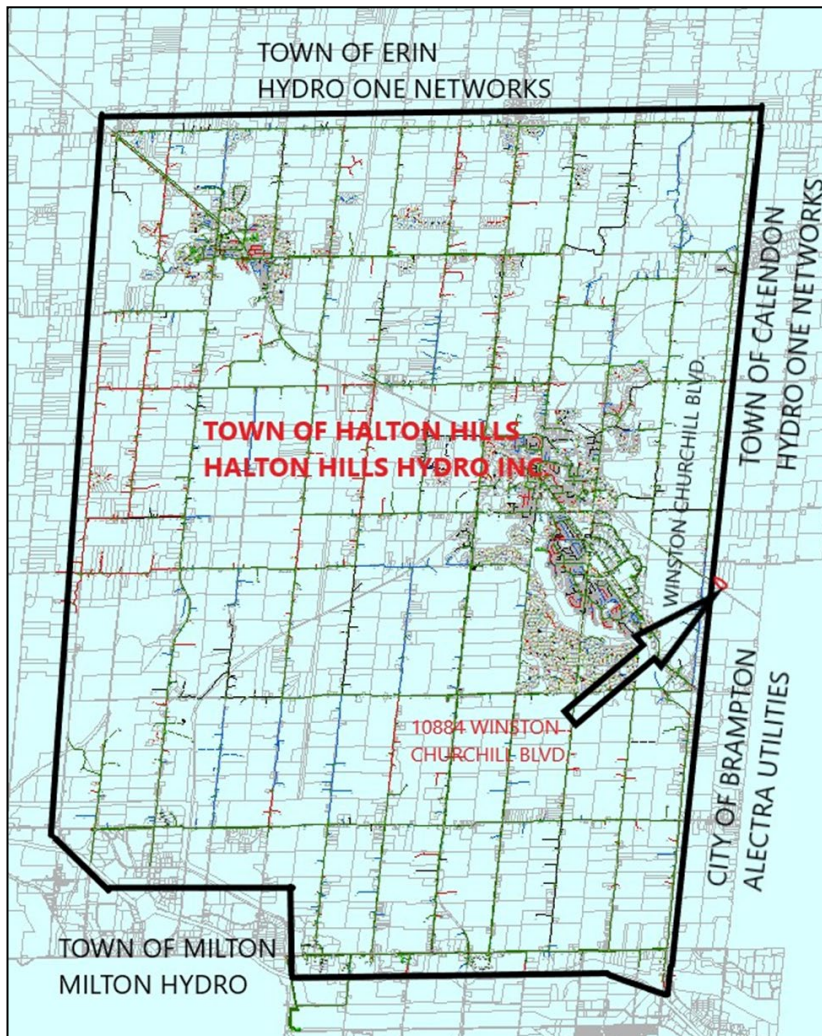
Refer to **Figure 1** above.

7.1.4 (a)

Borders of the applicant's service area

Figure 2 indicates the service territory of Halton Hills Hydro Inc., as well as the location of its border with Alectra Utilities and the location of the new customer along that border who is the subject of the SAA application.

Figure 2 – Borders of Halton Hills Hydro Inc.



7.1.4 (b)

Borders of the incumbent distributor's service area

The borders of Alectra's service area, as related to this Application, are shown in **Figure 2**.

7.1.4 (c)

Borders of any alternate distributor's service area

Not Applicable

7.1.4 (d)

Territory surrounding the area for which the applicant is making SAA application

See **Figure 2** above.

7.1.4 (e)

Geographical and geophysical features of the area including, but not limited to, rivers and lakes, property borders, roads, and major public facilities

The subject land is located on Winston Churchill Blvd. south of Wanless Drive and north of CNR's Kitchener rail line. The property is bordered by Winston Churchill Blvd to the west, and farm fields to the north and east.

The subject land is a rail storage yard for CNR.

7.1.4 (f)

Existing facilities supplying the area that is the subject of the SAA application, if applicable, as well as the proposed facilities which will be utilized by the applicant to supply the area that is the subject of the SAA application (Note: if the proposed facilities will be utilized to also provide for expansion of load in the area that is the subject of the SAA application, identify that as well)

HHHI has an existing 4800V single phase circuit on the west side of Winston Churchill Blvd.

There are no existing electrical service facilities on the subject property of the SAA. Proposed are facilities that will be owned by the customer and which connect to HHHI's distribution system on the west side of Winston Churchill Blvd. HHHI will own the pad mounted transformer and revenue meter on property and retain access in respect of the *Electricity Act, 1998*. For HHHI to connect this service, there is no system expansion required. Section 7.1.4 (a) shows the location of the subject land in relation to HHHI's service territory.

DISTRIBUTION INFRASTRUCTURE IN AND AROUND THE PROPOSED AMENDMENT AREA

7.1.5

Provide a description of the proposed type of physical connection (i.e., individual customer; residential subdivision, commercial or industrial development, or general service area expansion).

One (1) new General Service customer will be connected at 4800V.

***Provide a description of the applicant's plans, if any, for similar expansions in lands adjacent to the area that is the subject of the SAA application.
Provide a map or diagram showing the lands where expansions are planned in relation to the area that is the subject of the SAA application.***

HHHI has no expansion plans for lands adjacent to the area that is the subject of the SAA application.

7.2 EFFICIENT RATIONALIZATION OF THE DISTRIBUTION SYSTEM

The proposed SAA will be evaluated in terms of rational and efficient service area realignment. This evaluation will be undertaken from the perspective of economic (cost) efficiency as well as engineering (technical) efficiency.

Applicants must demonstrate how the proposed SAA optimizes the use of existing infrastructure. In addition, applicants must indicate the long term impacts of the proposed SAA on reliability in the area to be served and on the ability of the system to meet growth potential in the area. Even if the proposed SAA does not represent the lowest cost to any particular party, the proposed SAA may promote economic efficiency if it represents the most effective use of existing resources and reflects the lowest long run economic cost of service to all parties.

7.2.1 ECONOMIC AND ENGINEERING EFFICIENCY

In light of the above, provide a comparison of the economic and engineering efficiency for the applicant and the incumbent distributor to serve the area that is the subject of the SAA application.

In order to service the customer:

Alectra would need to either expand a pole line from the south for 237m which would include an overhead or underground crossing of a CNR line (approximately \$200,000); or string a single phase to HHHI's poles on the west side of WCB, north of the CNR line. HHHI would need to make some alterations to framing attachments and may have to replace a pole to accommodate this option (approximately \$40,000 - \$50,000).

HHHI would need to connect approximately 17m of line located from the CNR property, as the HHHI pole line is already present on the west side of Winston Churchill Blvd (\$17,000 including transformer).

With either option the customer would be required to obtain permits and conduct a directional bore to cross Winston Churchill Blvd and install a customer owned pole line or underground duct on CNR property for approximately 407m.

As a result, it would not be economical for Alectra to extend service to this customer based on the associated higher cost for the increased length of its required expansion.

7.2.1 (a)

Location of the point of delivery and the point of connection

This customer will be served by HHHI's 4800V line located on the west side of Winston Churchill Blvd. south of Wanless Dr. and north of the CNR tracks. Proposed are facilities that will be owned by the customer and which connect to HHHI's distribution system on the west side of Winston Churchill Blvd. HHHI will own the pad mounted transformer and revenue meter on property and retain access in respect of the *Electricity Act, 1998*.

7.2.1 (b)

Proximity of the proposed connection to an existing, well developed electricity distribution system

This customer will be served by HHHI's 4800V line located on the west side of Winston Churchill Blvd. south of Wanless Dr. and north of the CNR tracks (approximately 17m).

7.2.1 (c)

The fully allocated connection costs for supplying the customer (i.e., individual customers or developers) unless the applicant and the incumbent distributor provide a reason why providing the fully allocated connection costs are unnecessary for the proposed SAA (Note: the Board will determine if the reason provided is acceptable).

HHHI's fully allocated connection costs will be approximately \$17,000 plus tax (this amount includes a reduction for a basic connection and includes the cost of the pad mount transformer).

7.2.1 (d)

The amount of any capital contribution required from the customer

No capital contribution would be required from the customer.

7.2.1 (e)

Costs for stranded equipment (i.e., lines, cables, and transformers) that would need to be de-energized or removed

Not applicable – There would not be any stranded assets in need of removal or de-energization.

7.2.1 (f)

Information on whether the proposed SAA enhances, or at a minimum does not decrease, the reliability of the infrastructure in the area that is the subject of the SAA application and in regions adjacent to the area that is the subject of the SAA application over the long term

As this is an extension of an existing circuit, the proposed SAA will have no impact on the reliability of the existing infrastructure.

7.2.1 (g)

Information on whether the proposed infrastructure will provide for cost-efficient expansion if there is growth potential in the area that is the subject of the SAA application and in regions adjacent to the area that is the subject of the SAA application

Not applicable.

7.2.1 (h)

Information on whether the proposed infrastructure will provide for cost-efficient improvements and upgrades in the area that is the subject of the SAA application and in regions adjacent to the area that is the subject of the SAA application.

Not applicable.

7.3 IMPACTS ARISING FROM THE PROPOSED AMENDMENT

Description of Impacts

7.3.1

Identify any affected customers or landowners.

Refer to section 7.1.1(b)

7.3.2

Provide a description of any impacts on costs, rates, service quality, and reliability for customers in the area that is the subject of the SAA application that arise as a result of the proposed SAA. If an assessment of service quality and reliability impacts cannot be provided, explain why.

There will be no impacts on costs or rates for customers in the area that is the subject of this Application or that arise as a result of the proposed service area amendment. No impacts are expected on service quality or reliability.

7.3.3

Provide a description of any impacts on costs, rates, service quality, and reliability for customers of any distributor outside the area that is the subject of the SAA application that arise as a result of the proposed SAA. If an assessment of service quality and reliability impacts cannot be provided, explain why.

There are no impacts on costs, rates, service quality, or reliability for customers of any distributor outside the area that is the subject of the Application or that arise as a result of the proposed service area amendment.

7.3.4

Provide a description of the impacts on each distributor involved in the proposed SAA. If these impacts have already been described elsewhere in the application, providing cross-references is acceptable.

No impacts are anticipated.

7.3.5

Provide a description of any assets which may be stranded or become redundant if the proposed SAA is granted.

There will be no stranded or redundant assets resulting from this service area amendment.

7.3.6

Identify any assets that are proposed to be transferred to or from the applicant. If an asset transfer is required, has the relevant application been filed in accordance with section 86 of the Act? If not, indicate when the applicant will be filing the relevant section 86 application.

Not applicable - no assets are being transferred.

7.3.7

Identify any customers that are proposed to be transferred to or from the applicant.

Refer to sections 7.1.1 (c) and 7.1.3.

7.3.8

Provide a description of any existing load transfers or retail points of supply that will be eliminated.

There are no existing load transfers or retail points of supply that will be eliminated.

7.3.9

Identify any new load transfers or retail points of supply that will be created as a result of the proposed SAA. If a new load transfer will be created, has the applicant requested leave of the Board in accordance with section 6.5.5 of the Distribution System Code (“DSC”)?
If not, indicate when the applicant will be filing its request for leave under section 6.5.5 of the DSC with the Board. If a new retail point of supply will be created, does the host distributor (i.e., the distributor who provides electricity to an embedded distributor) have an applicable Board approved rate? If not, indicate when the host distributor will be filing an application for the applicable rate.

No new load transfers or retail points of supply created as a result of the proposed SAA.

EVIDENCE OF CONSIDERATION AND MITIGATION OF IMPACTS

7.3.10

Provide written confirmation by the applicant that all affected persons have been provided with specific and factual information about the proposed SAA. As part of the written confirmation, the applicant must include details of any communications or consultations that may have occurred between distributors regarding the proposed SAA.

The customer has been provided with specific and factual information about the proposed SAA. Prior to submitting an Offer to Connect to the customer, HHHI and Alectra determined that HHHI could connect more cost-effectively, and therefore was to submit the final offer to connect.

7.3.11

Provide a letter from the incumbent distributor in which the incumbent distributor indicates that it consents to the application.

Refer to Attachment A.

7.3.12

Provide a written response from all affected customers, developers, and landowners consenting to the application, if applicable.

Refer to Attachment B.

7.3.13

Provide evidence of attempts to mitigate impacts where customer and/or asset transfers are involved (i.e., customer rate smoothing or mitigation, and compensation for any stranded assets).

Not applicable – there are no adverse effects expected.

7.4 CUSTOMER PREFERENCE

7.4.1

An applicant who brings forward an application where customer choice may be a factor must provide a written statement signed by the customer (which includes landowners and developers) indicating the customer's preference.

Refer to Attachment B.

7.5 ADDITIONAL INFORMATION REQUIREMENTS FOR CONTESTED APPLICATIONS

If there is no agreement among affected persons regarding the proposed SAA, the applicant must file the additional information set out below.

Not applicable.

7.5.1

If the application was initiated due to an interest in service by a customer, landowner, or developer, evidence that the incumbent distributor was provided an opportunity to make an offer to connect that customer, landowner, or developer.

Not applicable.

7.5.2

Evidence that the customer, landowner, or developer had the opportunity to obtain an offer to connect from the applicant and any alternate distributor bordering on the area that is the subject of the SAA application.

Not applicable.

7.5.3

Actual copies of, as well as a summary of, the offer(s) to connect documentation (including any associated financial evaluations carried out in accordance with Appendix B of the Distribution System Code). The financial evaluations should indicate costs associated with the connection including, but not limited to, on-site capital, capital required to extend the distribution system to the customer location, incremental up-stream capital investment required to serve the load, the present value of incremental OM&A costs and incremental taxes as well as the expected incremental revenue, the amount of revenue shortfall, and the capital contribution requested.

Not applicable.

7.5.4

If there are competing offers to connect, a comparison of the competing offers to connect the customer, landowner, or developer.

Not applicable.

7.5.5

A detailed comparison of the new or upgraded electrical infrastructure necessary for each distributor to serve the area that is the subject of the SAA application, including any specific proposed connections.

Not applicable.

7.5.6

Outage statistics or, if outage statistics are not available, any other information regarding the reliability of the existing line(s) of each distributor that are proposed to supply the area that is the subject of the SAA application.

Not applicable.

7.5.7

Quantitative evidence of quality and reliability of service for each distributor for similar customers in comparable locations and densities to the area that is the subject of the SAA application.

Not applicable.

Method of Disposition

The applicant would ask that this matter be disposed of without a hearing, pursuant to subsection 21(4) of the *Ontario Energy Board Act, 1998* as Alectra has consented to HHHI's proposed service area amendment as shown in Attachment A, and given that there are no adverse or material impacts on any party resulting from the outcome of this proceeding.

Conclusion

The evidence filed with this Application confirms that Halton Hills Hydro Inc. is the preferred distributor of the subject Customer of this Application. The property is a natural extension to the Applicant's existing distribution system and the Applicant has sufficient capacity on its existing distribution facilities bordering the development to supply the proposed load without need for system expansion. No increase in rates for either Halton Hills Hydro Inc. or Alectra's existing customers will be required to service the proposed development as a result of this Application. Therefore, HHHI requests the Board grant approval for this Application.

HHHI requests the Board to dispose of the application without a hearing, on the basis that both parties agree to the amendment.

All of which is respectfully submitted this 26th day of November 2021.

Tracy Rehberg-Rawlingson

Tracy Rehberg-Rawlingson

Regulatory Affairs Officer

Halton Hills Hydro Inc.

Dated: **November 26, 2021**

List of Attachments

ATTACHMENT 'A'

Alectra Utilities Corporation – Letter of Consent

ATTACHMENT 'B'

Customer – Letter of Consent

ATTACHMENT 'A'

Alectra Utilities Corporation – Letter of Consent

BY EMAIL

November 26, 2021

Mr. Scott Knapman
President and CEO
Halton Hills Hydro Inc.
sknapman@haltonhillshydro.com

Dear Mr. Knapman:

Re: Halton Hills Hydro Inc. Application for a Distribution Licence Amendment

This letter confirms the support of Alectra Utilities Corporation (“Alectra”) for a service area amendment application which would amend the Distribution Licences of both Halton Hills Hydro Inc. (“HHHI”) and Alectra for the purpose of connecting a single customer.

The Customer that is the subject of this application is located at municipal address 10884 Winston Churchill Boulevard, Brampton, Ontario, for which the legal property description is PT LT 13 CON 6 WHS CHINGUACOUSY BEING RAILWAY AS IN OMT49698; PT LT 14CON 6 WHS CHINGUACOUSY AS IN CH30043, OMT49698; PT LT 15 CON 6 CHINGUACOUSY AS IN CP8; BRAMPTON; S/T CH23702 being all of PIN 14362-0063 (LT).

The Customer is located within Alectra’s service territory and lies along the border of Halton Hills service territory. Alectra agrees with HHHI’s wish to service the Customer and supports this application for distribution license amendments which would include the property identified above in Schedule 1 of HHHI’s Distribution Licence (ED-2002-0552) and exclude the same property from Schedule 1 of Alectra’s Distribution License (ED-2016-0360) in the Brampton Rate Zone.

Alectra supports HHHI’s request to proceed with this service area amendment without a hearing.

All of which is respectfully submitted by:

[ORIGINAL SIGNED BY]

Michael Lister
Acting Vice President, Regulatory Affairs
Alectra Utilities Corporation

cc. Tracy Rehberg-Rawlingson

ATTACHMENT 'B'

Signum – Letter of Consent



November 18, 2021

Mr. Christopher Hale, C.E.T., LEL
Engineering Supervisor
Halton Hills Hydro Inc.
43 Alice Street
Acton, ON. L7J 2A9

Re. Letter of Authorization for Service Area Amendment

Dear Mr. Hale,

Please accept this letter on behalf of Signum Wireless to have Halton Hills Hydro Inc. submit a Service Area Amendment application to the Ontario Energy Board in regards to the property at 10884 Winston Churchill Blvd., Brampton, Ontario. We at Signum accept that Halton Hills Hydro Inc. will be the distributor of electrical power for our cellular tower service.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Araújo", written in a cursive style.

Fernando Araújo
Vice President of Operations
Signum Wireless