

BY EMAIL AND RESS

April 14, 2023

Ms. Nancy Marconi
Registrar
Ontario Energy Board
Suite 2700, 2300 Yonge Street
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Ms. Marconi,

EB-2020-0176 – Hydro One Networks’ Inc. – Response to the proposed TSC and DSC Amendments

Hydro One Networks Inc. (“Hydro One”) is providing the following submission in response to the proposed changes to the TSC and DSC.

Hydro One is supportive of the proposed changes. As a major transmitter in the province, Hydro One has already been incorporating End-Of-Life (“EOL”) asset information in Needs Assessment (“NA”) and Regional Infrastructure Plan (“RIP”) reports since the second cycle of regional planning. Further enhancements are being made to document this information in reports including information from other transmitters and/or distributors who may own and operate transmission assets. Hydro One looks forward to continue working with the IESO and Distributors to develop effective regional plans.

Hydro One offers the following two comments on the proposed amendments:

1. Consistent with discussions with the RPPAG, we suggest adding a threshold for EOL Overhead lines, Underground cables and Circuit breakers. As suggested by the RPPAG EOL Sub-Group, these thresholds were developed because replacement of short conductor/cable line sections (e.g. a few spans) and a single or a few circuit breakers have a very limited impact to regional planning. The proposed edits are highlighted in yellow below.

TSC

3C.2.2: For the purposes of section 3C.2.1, a transmitter shall:

...

(d) within 10 days of completion of a needs assessment for a region, provide a report to ~~the OPA~~, the IESO, and all licensed distributors and licensed transmitters within the region that reflects the results of the needs assessment, including the identity of the licensed distributors that will and will not need to be involved in further regional planning activities for the region, and post that report on its website. The report shall include a 10-year outlook related to the end-of-life of major transmission assets that the lead transmitter owns and, where applicable, the 10-year outlook of the end-of-life information provided by licensed distributors under section 8.31(a) of the Distribution System Code and other transmitters.

For the purpose of this section, major transmission assets include transformers, circuit breakers (where replacement includes the lesser of six breakers or more than 50% of station breakers), overhead lines (where Leave to Construct approval under s. 92 of the OEB Act is required), and underground cables (where Leave to Construct approval under s. 92 of the OEB Act is required).

DSC

8.3.1 A transmission-connected distributor shall provide the following to the lead transmitter for the region within which the distributor's licensed service area is located, in whole or in part:

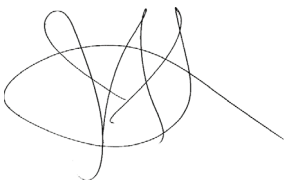
(a) such information as the lead transmitter may from time to time reasonably require to support regional planning, and shall do so within 60 days of receipt of the lead transmitter's request. For clarity, where a distributor owns transmission voltage assets, the information provided to the lead transmitter shall include a 10-year outlook related to the end-of-life of major transmission voltage assets, including.

For the purpose of this section, major transmission assets include transformers, circuit breakers (where replacement includes the lesser of six breakers or more than 50% of station breakers), overhead lines (where Leave to Construct approval under s. 92 of the OEB Act is required), and underground cables (where Leave to Construct approval under s. 92 of the OEB Act is required).

2. Hydro One recommends aligning the DSC and TSC amendments by modifying the DSC amendment to say, "...shall include 10-year outlook related to the end-of-life of major transmission voltage assets. For the purpose of this section, major transmission assets include transformers, circuit breakers, overhead lines, and underground cables".

Hydro One is appreciative of the proposed code amendments to the TSC and DSC included in OEB file EB-2020-0176. These changes along with the recommendations included herein, are consistent with the RPPAG EOL Sub-Group and will assist the efficient execution of the regional planning process.

Sincerely,



Jeffrey Smith