

To:

Kirsten Walli
Board Secretary
Ontario Energy Board
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Quote File: **EB-2007-0709**

From:

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To Ms. Walli:

Herein are our comments pertaining to the “Proposed Amendments to the Distribution System Code”, Appendix A, that was released on October 31, 2008 by the Ontario Energy Board for the public to comment on.

Sincerely,

Ross and Darlene Brindley

1. The addition of wording to allow for: Section 4.7 comes into force on the date that is three months from the date on which Appendix H referred to in sections 4.7.2 and 4.7.3 is published on the Board's website after having been made by the Board.

Our Comment:

We feel this to be appropriate as long as Appendix H is published as soon as possible.

2. Section 4.1.3 of Distribution System Code is amended by replacing the word "A" at the beginning of that section with the following:

Subject to section 4.7, a

Our Comment:

This is just legal wording for the code, which is fine with us.

3. Section 4.1.4 of the Distribution System Code is amended by replacing the word "If" at the beginning of that section with the following:

Except in relation to an investigation conducted under section 4.7, if

Our Comment:

This again is just legal wording for the code, which is fine with us.

4. Section 4 of the Distribution System Code is amended by adding the following immediately after section 4.6.5:

4.7 Farm Stray Voltage

4.7.1 In this section 4.7:

ACC—means animal contact current, being the steady state 60 Hz (including harmonics thereof) root mean square alternating current when measured through a 500 Ohm resistor connected between animal contact points;

ACV—means animal contact voltage, being the steady state 60 Hz (including harmonics thereof) root mean square alternating current voltage when measured in parallel with a 500 Ohm resistor connected between animal contact points;

"farm stray voltage" means ACC or ACV occurring at a location on a farm where livestock make contact with it; and

"livestock farm customer" in respect of a distributor means any customer of the distributor that is engaged principally in livestock husbandry in an area zoned for agricultural use.

Our Comment:

In this section we are given the definition of what ACC, ACV, “farm stray voltage”, “livestock farm customer” mean by definition.

4.7.2 A distributor shall initiate a farm stray voltage investigation using the procedure set out in Appendix H where a livestock farm customer provides the distributor with information that reasonably indicates that farm stray voltage may be adversely affecting the operation of the livestock farm customer’s farm.

Our Comment:

We feel that the distributor’s representative must have ACTUAL knowledge of how stray voltage affects livestock and NOT just theory on stray voltage because the representative should be actually able to look at the animals and see symptoms of farm stray voltage.

4.7.3 Where an investigation initiated under section 4.7.2 reveals that either:

- a) ACC on the farm exceeds 2.0 milliamperes; or
- b) ACV on the farm exceeds 1.0 volts,

the distributor shall conduct tests in accordance with the investigation procedure set out in Appendix H to determine whether and the extent to which the distributor’s distribution system is contributing to farm stray voltage measured on the farm.

Our Comment:

PLEASE NOTE IF THERE IS A POSSIBILITY OF STRAY VOLTAGE BEING CAUSED BY A SET OF WIND FARM TRANSMISSION LINES...

If there is a possibility of the farm stray voltage being caused by transmission lines from a wind farm/project through “INDUCTION” onto the distribution lines, then the distribution personnel who are conducting the initial testing according to Appendix H **should** make sure the testing is done when there is a “significant amount” of current on the transmission lines making it easier to distinguish the amount of farm stray voltage affecting that particular farm. (The distributor may have to get the MW/current being used/paid to the wind company at the substation accepting the power, for the same time period that the testing is being done on the farm.)

4.7.4 Where the tests referred to in section 4.7.3 reveal that the distributor’s distributions system is contributing more that 1mA ACC or 0.5 V ACV to farm stray voltage on a farm, the distributor shall take such steps as may be required to ensure that such contributions does not exceed 1mA ACC or 0.5 V ACV.

Our Comment:

IF the distribution system has a set of transmission lines CLOSE to its proximity contributing/causing the farm stray voltage on the distribution system lines, then the distributor shall begin talks/action with the company owning the transmission lines

..Having NO MORE than 2 weeks (a set time limit) to start corrective action.

..And the whole problem of farm stray voltage should be fixed within 6 months (set time limit) or a resolution made.

The reason we are commenting, as such, on a fixed timeline is because IF the farm stray voltage is impacting the livestock, it is therefore causing the farmer financial distress, physical/emotional distress, and definitely affecting the livestock, otherwise the owners of the transmission lines can **drag** the resolution of the problem out for YEARS. This we feel is not fair to the farmer.

4.7.5 A distributor shall ensure that persons responsible for investigating, analyzing and determining the appropriate means of remediating farm stray voltage situations on the distributor's behalf for the purposes of meeting the distributor's obligations under this section 4.7 have competency in performing these activities. Competency may be based on recognized qualification requirements that include a training course that meets the requirements of the tasks to be performed. Services provided in relation to these activities by a person that does not have the recognized qualification requirements shall be reviewed, affirmed and documented by a person with exhibited competency.

Our Comment:

One of the requirements that we feel would be of great help to the farmer, is having the investigating personnel be able to distinguish an animal "in distress" or showing signs of farm stray voltage, NOT just the "schooled theory" but **actual understanding** of how stray voltage works on animals and its affects on them. (This *should include* the Electrical Engineers who over see these particular farm stray voltage investigations)

4.7.6 A distributor serving livestock farm customers shall document, post on its web site and otherwise make available to any person on request, and file with the Board upon request, a farm stray voltage customer response procedure that describes the steps involved in the distributor's response to farm stray voltage complaints and inquiries. At a minimum, the customer response procedure must indicate:

- a) how and to whom farm stray voltage complaints and inquiries should be made by livestock farm customers;
- b) the types of information required by the distributor regarding the

basis of the livestock farm customer's concern that ACC/ACV from the distributor's system is affecting farm operations; and

c) the estimated amount of time the distributor requires following receipt of a complaint or inquiry to contact the livestock farm customer for the purpose of scheduling a site visit for the purpose of initiating an investigation where an investigation is required

Our Comment:

We do agree with this procedure and the fact that there is a time line given for initiating the farm stray voltage investigation.

4.7.7 A distributor shall record, retain and provide to the Board, on request and in the form and manner required by the Board, the following information:

a) the name and contact information of each livestock farm customer that submits a farm stray voltage complaint to the distributor, the date of the complaint and the date on which the matter was considered closed by the distributor; and

b) for each farm stray voltage investigation initiated by the distributor:

- site information for the livestock farm customer's farm, including location; the identity and design characteristics of the circuit(s) supplying the site; and distance of the site from the circuit substation and from the end of the circuit;
- test measurement values recorded in the process of conducting the investigation and of any required remediation activities; and
- identified ACC or ACV source(s) and distribution system contribution levels; any remediation measures taken; and the total cost of the investigation and of any remediation measures taken.

Our Comment:

We like the fact that records are kept, as from start to close of investigations; the work, testing, and results of the investigations. It gives other distributing personnel a chance to learn and possibly use for a guideline of testing, from some more difficult cases of farm stray voltage. These could also be used in teaching courses for other distributing personnel.

4.7.8 A distributor serving livestock farm customers shall, not less than annually, provide written notice to all livestock farm customers in its service area describing how they can obtain the following from the distributor:

- a) information on what farm stray voltage is, what causes it, and common ways of addressing distribution system contributions to it;
- b) a copy of the distributor's farm stray voltage customer response procedure referred to in section 4.7.6; and
- c) a copy of the distributor's dispute resolution process set out in its Conditions of Service.

Such notice may be given by including an insert with at least one bill submitted to livestock farm customers or by any other means as may reasonably be expected to bring the information to the attention of livestock farm customers. Posting of the information or of notice of the availability of the information on the distributor's website alone shall not constitute sufficient written notice for the purposes of this section.

Our Comment:

We feel this information will help farmers because it will clarify how each process should work and what the farmer should expect to happen if they do have a problem with stray voltage on their farm.

Thank you for allowing us to participate with written comments on the "Appendix A", the proposed amendments to the distribution system code.

Ross and Darlene Brindley