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December 2, 2008

Ontario Energy Board  
P.O. Box 2319  
Suite 2700  
2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: EB-2007-0709 Proposed Amendments to the Distribution System Code**

Waterloo North Hydro Inc. (WNHI) appreciates the opportunity to provide comments on the OEB Proposed Amendments to the Distribution System Code (DSC) regarding Farm Stray Voltage.

WNHI has the following comments:

**1. Section 8, page 18 Providing Information to Livestock Farm Customers**

***“The Board proposes that the Code be amended to require that, at least annually, distributors notify their livestock farm customers in writing as to how they can obtain from the distributor: information on farm stray voltage; a copy of the distributor’s farm stray voltage customer response procedure (see section 6 above); and a copy the distributor’s dispute resolution process as set out in its Conditions of Service.”***

WNHI submits that compliance with this requirement is difficult for distributors as livestock customers are a not readily identifiable customer grouping. WNHI does not have a specific rate class for our agricultural customers; they may be in one of three rate classes (Residential, General Service Less Than 50 kW and General Service and Greater Than 50 kW). WNHI also notes that not all agricultural customers will have livestock.

1. **Section 8, page 18 Providing Information to Livestock Farm Customers - continued**

WNHI submits that annual notices would be problematic and distributors would incur costs which would exceed any benefits gained.

WNHI also notes that Proposed Amendments to the DSC Section 6, Page 15 states “*the Board proposes to amend the Code to provide that distributors serving livestock farm customers document, post on their web site and otherwise make available upon request, and file with the Board upon request a farm stray voltage customer response procedure.*” which is also requiring the distributor to provide the aforementioned information on their website. WNHI supports this requirement as a cost effective measure.

WNHI recommends that the OEB adopt the proposed amendment in DSC Section 6, Page 15 and to not adopt the notification requirements proposed in DSC Section 8, Page 18 for the reasons discussed above.

2. **Section 3, page 11 A Proposed ACC/ACV Distributor Contribution Threshold**

***“... the Board proposes to amend the Code to require that where tests reveal that the distributor’s distribution system is contributing to farm stray voltage on a farm, the distributor take steps to ensure that such contribution does not exceed 1 mA ACC or 0.5 V ACV.”***

WNHI agrees that measurement of 1 mA ACC or 0.5 V ACV is technically feasible. WNHI submits however, that at these proposed levels, identification and attribution of the measured signal to one or many specific sources extremely difficult and in some situations virtually impossible. Levels in the 5V to 10V range measured at the transformer would be more realistic.

3. **Section 7, page 17 Distributor Reporting Requirements**

***“Accordingly, the Board proposes that the Code be amended to provide that distributors record, retain and provide to the Board, on request and in the form and manner required by the Board, information in relation to farm stray voltage complaints and investigations.”***

WNHI would request that the Board establish a retention policy regarding the length of time distributors would be required to retain all records in relation to farm stray voltage complaints and investigations.

WNHI supports the Board’s proposal for distributors to provide reporting information on a request only basis.

If there are any questions, please contact Herb Haller, at 519-888-5568, [hhaller@wnhydro.com](mailto:hhaller@wnhydro.com) or Erik Veneman at 519-888-5567, [eveneman@wnhydro.com](mailto:eveneman@wnhydro.com) .

Yours truly,

***Original Signed By***

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