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Fraser Consulting and Associates

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Board Secretary

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To: Ontario Energy Board Secretary:

**Re: Notice of a Proposal to Amend a Code - Proposed Amendments to the Distribution System Code**

**Board File No: EB-2007-0709**

I have reviewed with great interest the Board’s October 31 released Proposed Amendments, Appendix A and also the references to the pending Appendix H, all dealing with Farm Stray Voltage.

I am pleased to note it is clear in Appendix A that:

- firstly the distributor would be called on to initiate a farm stray voltage investigation using procedures that are still to be set out in Appendix H.

 - secondly this investigation should take place when 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.

In early July 2008 I, on behalf of Fraser Consulting and Associates, filed a submission to the Ontario Energy Board Farm Stray Voltage Consultations. This was in response to the Board Staff Discussion paper released in May 2008. In that report I/we observed:

“It is agreed the estimated 15-20 Ontario farmers who report suspected FSV issues to their distributor should be viewed with real caution and even suspicion. It is strongly suspected many farmers with possible stray voltage problems do not report their concerns to their distributor as there is a strong sense of cynicism that nothing or little would be done to correct their problems. They do not want to run the chance of being reminded by the distributor that “it must your management”!

It will therefore be obvious that I/we support strongly the above two strong proposals.

The OEB through Appendix A will ensure a much clearer assessment of the true incidence and impacts of FSV in Ontario. This is long overdue. The last time such an investigation took place in the Province was in 1983 by the then Ontario Ministry of Agriculture and Food entitled “Field Survey of Neural to Earth Voltage on Ontario Dairy Farms”. That was 25 years ago! I suggest the OEB (with support of the Ontario Federation of Agriculture (OFA) and the Dairy Farmers of Ontario (DFO) and other livestock groups in the Province) review carefully a questionnaire instrument already field-tested by Fraser and Associates. It is entitled “Dairy Farm Survey of Milk Yield, Reproduction, Herd Health and Herd Environmental Impacts of Farm Stray Voltage”**.** This would allow livestock farm customers – in this case dairy producers - to file with their distributor a questionnaire such as this when it is thought FSV is suspected and as would be incorporated into Appendix H.

I hereby submit to the Board that Fraser Consulting and Associates is fully prepared to offer up such a questionnaire. The investigation should be done in two stages. The 100-question questionnaire that would be used has already been field tested on farms known to have and not have problems.

* Firstly, it would be sent to about 50 dairy producers known to have suspected farm stray voltage as identified by technicians of a major artificial insemination business in Ontario. In this first round a combination of visual and instrumental assessments would need to be made to ensure the questionnaire is identifying real cases of FSV.
* Secondly, of the estimated 4000 dairy producers in Ontario, randomly identify 30% of the herds and then distribute by proportion across Ontario with the full cooperation of the OFA and DFO.

This process would be considered a current quantitative assessment of FSV across Ontario as a direct outcome of extending the intent of Appendix A through to Appendix H. Then livestock farm operators who suspect FSV is adversely affecting their operation would use this questionnaire into the future to file with their distributor which then would respond appropriately.

It is submitted that the principle Distributor in Ontario, Hydro One, be the one to underwrite this first provincial assessment as they represent I understand about 80% of the rural farm business in cooperation with the OFA and DFO. From then on it would be the individual distributor’s responsibility for underwriting and doing the field assessments and mitigation.

I would be pleased to respond further to the proposals outlined above.

Yours truly:

(Original signed)

Barry G. Fraser