

**BY EMAIL AND RESS**

July 5, 2024

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

Dear Ms. Marconi,

**RE: Application for an Exemption from Section 6.1.3 of the Transmission System Code for B2M Limited Partnership & Niagara Reinforcement Limited Partnership**

On May 1, 2024, Hydro One Networks Inc. (“Hydro One”) received enquiries from the Ontario Energy Board (“OEB” or the “Board”) requesting information regarding B2M Limited Partnership (“B2M LP”) and Niagara Reinforcement Limited Partnership’s (“NRLP”) compliance with Section 6.1.3 of the Transmission System Code (TSC), which requires a transmitter to published Board-approved connection procedures for processing requests to connect to its transmission system. B2M LP and NRLP are both licensed transmitters in Ontario and affiliates of Hydro One. B2M LP owns the transmission lines and towers associated with the B501M and B502M transmission circuits, in addition to certain rights to Hydro One’s existing transmission corridor along the circuit routes. NRLP owns the transmission lines and towers associated with the Q26M and Q35M transmission circuits.

On behalf of B2M LP and NRLP, Hydro One requests a temporary exemption from the requirements in Section 6.1.3 of TSC until Hydro One files its updated Transmission Connection Procedures (TCP), which will establish common connection procedures for B2M LP and NRLP. Hydro One anticipates filing an update to its TCP with the OEB in early 2025 following the conclusion of the OEB’s recently launched consultation to review the connection rules and procedures established in the TSC.

Hydro One requests that an interim exemption be granted until the OEB issues its decision regarding this matter. Hydro One requests that a proceeding be conducted by way of a written hearing, if necessary.

**1. BACKGROUND**

Section 6.1.3 of the TSC requires all licensed transmitters in Ontario to publish their connection procedures, which must be approved by the OEB, on their website with the OEB. Section 6.1.4 of the TSC provides further details as to what types of procedures and processes shall be defined in a transmitter’s connection procedures.

Currently, B2M LP and NRLP do not have OEB-approved connection procedures for processing requests to connect to its transmission facilities or to modify existing connections, as required by the TSC. There are no customers connected to B2M LP or NRLP’s transmission facilities nor have B2M LP or NRLP been approached by any potential customers wanting to connect to their facilities.

## 2. EXEMPTION RATIONALE

At the time that B2M LP and NRLP's assets were placed in service, neither B2M LP or NRLP had received any requests from prospective customers seeking to connect to their facilities. Similarly, at the time, there was no reasonable expectation that a prospective customer would request a connection to these facilities in the imminent future. Since that time, no prospective customers have requested a connection to B2M LP or NRLP's transmission facilities. As a result, neither B2M LP or NRLP had given consideration to filing their own connection procedures with the OEB.

Hydro One has completed a review of its TCP and intends to file an update with the OEB. This planned update will clarify that Hydro One's TCP would also apply to any affiliates of Hydro One who are licensed transmitters, including B2M LP and NRLP. Following discussions with OEB Staff, Hydro One was advised to delay filing its TCP update until after the conclusion of the OEB's recently launched consultation to review the connection rules and procedures in the TSC.

## 3. EXEMPTION REQUEST

On behalf of B2M LP and NRLP, Hydro One requests an exemption from Section 6.1.3 of the TSC for both licensees until Hydro One files its planned TCP update with the OEB for approval. Hydro One anticipates filing its TCP update within the next 6-8 months although this timeframe could change depending on the duration and outcomes from the TSC review consultation.

In the meantime, in the event that B2M LP or NRLP receives a request for connection in the immediate or near future, B2M LP and NRLP shall process requests for connection and deal with other related matters in accordance with all applicable provisions of the TSC and otherwise in a manner that is reasonable and consistent with the TSC, the OEB Act, the Electricity Act and its licence.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Savulak". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jason Savulak