

Hydro One Networks Inc.

483 Bay Street 7th Floor South Tower Toronto, Ontario M5G 2P5 HydroOne.com

Joanne Richardson

Director, Major Projects, and Partnerships C 416.902.4326 Joanne.Richardson@HydroOne.com

BY EMAIL AND RESS

July 11, 2024

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

Dear Ms. Marconi,

RE: Service Area Amendment Application for Hydro One Networks Inc. to connect the Smooth Run Phase 1 and Phase 2 Subdivision – New Castle Ontario

Hydro One Networks Inc. ("Hydro One") is submitting this Service Area Amendment ("SAA") application ("the Application") to the Ontario Energy Board ("OEB") to request an amendment to Hydro One's Distribution Licence (ED-2003-0043) and the distribution licence of Elexicon Energy Inc. ("Elexicon") (ED-2019-0128). The Application is being made specifically for the purpose of connecting the Smooth Run Phase 1 and Phase 2 Subdivision ("the Customer") in New Castle, Ontario.

Should you have any questions on this application, please contact Mark Ciufo at (416) 345-5905 or via email at Mark.Ciufo@HydroOne.com.

An electronic copy of this application has been submitted using the Board's Regulatory Electronic Submission System.

Sincerely,

Joanne Richardson

CC - Abdul Hussaini, Hydro One Networks Inc.

Service Area Amendment Application Hydro One Networks Inc. And Elexicon Energy

7.0 INTRODUCTION

This application for a Service Area Amendment is structured and follows the minimum filing requirement for SAA assigned by the Ontario Energy Board. The section numbers follow the filing requirement of the base reference.

Hydro One Networks Inc. ("Hydro One") is submitting this Service Area Amendment ("SAA") application ("the Application") to the Ontario Energy Board ("OEB") to request an amendment to Hydro One's Distribution Licence (ED-2003-0043) and the distribution licence of Elexicon Energy Inc. ("Elexicon") (ED-2019-0128). The Application is being made specifically for the purpose of connecting the Smooth Run Phase 1 and Phase 2 Subdivision ("the Customer") in Newcastle, Ontario.

Geographically, the Customer's property requiring connection is mostly located within Hydro One's service territory with a small portion in Elexicon's service territory. Hydro One has a 3-phase line with sufficient capacity that lies along this customer's connection that will facilitate connection. Conversely, Elexicon will need a 3-phase expansion to connect and accommodate the Customer's load supply request.

Hydro One has completed the design and cost estimate and is ready to provide the Offer to Connect ("OTC") to the Customer. Hydro One considers itself to be the more economic efficient utility to serve this connection due to the existing lies along distribution infrastructure. Hydro One has received both Elexicon's and Customer's consent to proceed with this connection. The Customer is requesting an in-service date as soon as possible and Hydro One requests an expeditious approval from the OEB with no hearing in order to meet the needs of the Customer.

For the reasons set out below, Hydro One respectfully submits that it is in the public interest to make the necessary amendments to the licences of the two impacted distributors without a hearing such that these development lands are included in Hydro One's service territory. Hydro One submits that it is the most economically rational and technically efficient option to supply the Customer. This Application is supported by the Customer and Elexicon, as outlined in the Letters of Support included in **Attachment 5** and **Attachment 6**.

This Application is consistent with, and satisfies the requirements outlined in the OEB's Chapter 7 Filing Requirements for Transmission and Distribution Applications. The Application is predicated on the principles established in the Board's Decision with Reasons in the RP-2003-0044 combined service area amendments proceeding (the "Combined Proceeding").

7.1 BASIC FACTS

GENERAL

7.1.1 (a)

Provide the contact information for the applicant

Contact information includes the name, postal address, telephone number, and, where available, the email address and fax number of the person

The Applicant:

Hydro One Networks Inc.

483 Bay Street, 7th Floor, South Tower, Toronto, ON M5G 2P5

Phone: (416) 345-5405 Fax: (416) 345-5866

Email: Regulatory@HydroOne.com

Contact Person: Mark Ciufo

Regulatory Analyst, Regulatory Affairs

Phone: (416) 345-5905

Email: Mark.Ciufo@hydroone.com

7.1.1 (b)

Provide the contact information for the incumbent distributor Contact information includes the name, postal address, telephone number, and, where available, the email address and fax number of the person

The Incumbent Distributor or Co-Applicant:

Elexicon Energy Inc. 55 Taunton Rd. E. Ajax, ON L1T 3V3

Phone: (905) 427-9870 Fax: (905) 619-0210

Contact Person: Erin Stevens

Manager, Regulatory Applications and Accounting

Phone: (289) 355-9390

Email: estevens@elexiconenergy.com

Provide every affected customer, landowner, and developer in the area that is the subject of the SAA Application

Contact information includes the name, postal address, telephone number, and, where available, the email address and fax number of the person

The Registered Owner/Developer or Customer(s):

Smooth Run Development Inc.

30 Floral Parkway Concord, ON L4K 4R1 Phone: (905) 669-5571 Email: info@dggroup.ca

Contact Person: Corrado Russo

Project Manager - Engineering

Phone: (905) 669-5571 Email: crusso@dggroup.ca

7.1.1 (d) & (e)

Provide any alternate distributor other than the applicant and the incumbent distributor, if there are any alternate distributors bordering on the area that is the subject of the SAA application; and any representative of the persons listed above including, but not limited to, a legal representative

There are no alternate distributors or other parties affected by this SAA.

7.1.2 REASONS FOR APPROVAL OF THIS AMENDMENT

Indicate the reasons why this amendment should occur and identify any load transfers eliminated by the proposed SAA.

Hydro One submits that the proposed SAA is in the public interest as defined in the Combined Proceeding for the following reasons:

- 1. The proposed SAA is consistent with the objective of a rational and effective service area alignment based on both economic and engineering efficiency.
- 2. Hydro One has infrastructure that lies along the Subject Area that can provide the required electrical service.
- 3. Hydro One's connection proposal for the Subject Area is comparable to Elexicon in terms of system planning, safety and service reliability.
- 4. The proposed SAA will not result in stranded or duplicated assets.
- 5. The incorporation of the Subject Area Lands into Hydro One's service area will be seamless. The Subject Area Lands will be contiguous to Hydro One's existing service territory.
- 6. The Customer's preference is that Hydro One service the Subject Area.

There would be no load transfers created or eliminated as a result of the proposed SAA consistent with the Distribution System Code ("DSC").

DESCRIPTION OF PROPOSED SERVICE AREA

7.1.3

Provide a detailed description of the lands that are the subject of the SAA application. For SAA applications dealing with individual customers, the description of the lands should include the lot number, the concession number, and the municipal address of the lands. The address should include the street number, municipality and/or county, and postal code of the lands.

For SAA applications dealing with general expansion areas, the description of the lands should include the lot number and the concession number of the lands, if available, as well as a clear description of the boundaries of the area (including relevant geographical and geophysical features).

The legal description of the land subject to this amendment is Part Lots 27 & 28 Concession 2 Clarke Municipality of Clarington. The proposed development will consist of 232 residential customers. Please see **Attachment 3** for a map showing the subject area.

Upon approval of the Application, Hydro One's licence (ED-2003-0043), will not need to be specifically updated to include this property. However, upon approval of the Application, an update will be necessary to Elexicon's Licence (ED-2019-0128) by adjusting the Clarington – Newcastle service area boundaries in Schedule 1 Appendix B. Please see **Attachment 2**.

7.1.4

Provide one or more maps or diagrams of the area that is the subject of the SAA application.

Please refer to Attachment 1.

7.1.4 (a)

Borders of the applicant's service area

Please refer to Attachment 1.

7.1.4 (b)

Borders of the incumbent distributor's service area

Please refer to Attachment 1.

7.1.4 (c)

Borders of any alternate distributor's service area

N/A – there are no alternate distributors surrounding this area.

7.1.4 (d)

Territory surrounding the area for which the applicant is making SAA application

Please refer to Attachment 1.

7.1.4 (e)

Geographical and geophysical features of the area including, but not limited to, rivers and lakes, property borders, roads, and major public facilities

Please refer to Attachment 3.

7.1.4 (f)

Existing facilities supplying the area that is the subject of the SAA application, if applicable, as well as the proposed facilities which will be utilized by the applicant to supply the area that is the subject of the SAA application (Note: if the proposed facilities will be utilized to also provide for expansion of load in the area that is the subject of the SAA application, identify that as well)

Please refer to **Attachment 3.** Hydro One will utilize the existing 8.32kV Curve Inn DS F1 feeder to supply the subdivision.

DISTRIBUTION INFRASTRUCTURE IN AND AROUND THE PROPOSED AMENDMENT AREA

7.1.5

Provide a description of the proposed type of physical connection (i.e., individual customer; residential subdivision, commercial or industrial development, or general service area expansion).

This connection is for a total of 232 residential developments in a new subdivision. Phase 1 consists of 84 residential developments and Phase 2 consists of 148 residential developments.

7.1.6

Provide a description of the applicant's plans, if any, for similar expansions in lands adjacent to the area that is the subject of the SAA application.

Provide a map or diagram showing the lands where expansions are planned in relation to the area that is the subject of the SAA application.

The Smooth Run subdivision currently has plans for 5 Phases within the same lands. Phase 3 consists of an additional 94 residential developments and a school. Plans for Phase 4 and Phase 5 have yet to be finalized.

Please refer to Attachment 4.

7.2 EFFICIENT RATIONALIZATION OF THE DISTRIBUTION SYSTEM

The proposed SAA will be evaluated in terms of rational and efficient service area realignment. This evaluation will be undertaken from the perspective of economic (cost) efficiency as well as engineering (technical) efficiency.

Applicants must demonstrate how the proposed SAA optimizes the use of existing infrastructure. In addition, applicants must indicate the long term impacts of the proposed SAA on reliability in the area to be served and on the ability of the system to meet growth potential in the area. Even if the proposed SAA does not represent the lowest cost to any particular party, the proposed SAA may promote economic efficiency if it represents the most effective use of existing resources and reflects the lowest long run economic cost of service to all parties.

This Application represents the most economically and technically efficient way to service the area. As represented in **Attachment 3**, Hydro One has existing lies along assets with sufficient capacity to service the customer.

7.2.1 ECONOMIC AND ENGINEERING EFFICIENCY

In light of the above, provide a comparison of the economic and engineering efficiency for the applicant and the incumbent distributor to serve the area that is the subject of the SAA application. (NOTE: (a), (b), (c), (d), (e), (f), (g), (h))

7.2.1 (a)

Location of the point of delivery and the point of connection

Hydro One will service the subject area using its existing Curve Inn DS F1 feeder, which lies along the subject area.

7.2.1 (b)

Proximity of the proposed connection to an existing, well developed electricity distribution system

The proposed new connection lies along Hydro One's existing distribution system off North Street which will be connected to Smooth Run through the Brookfield subdivision (abutting subdivision to the north).

7.2.1 (c)

The fully allocated connection costs for supplying the customer (i.e., individual customers or developers) unless the applicant and the incumbent distributor provide a reason why providing the fully allocated connection costs is unnecessary for the proposed SAA

(Note: the Board will determine if the reason provided is acceptable).

Hydro One connection costs are as follows:

_	Cost	HST	Total Cost
Phase 1	\$488,695.00	\$63,530.35	\$552,225.35
Phase 2	\$526,024.00	\$68,383.12	\$594,406.12
		Grand Total	\$1,147,631.47

7.2.1 (d)

The amount of any capital contribution required from the customer

A capital contribution will not be required from the Customer.

7.2.1 (e)

Costs for stranded equipment (i.e., lines, cables, and transformers) that would need to be deenergized or removed

There will be no equipment or assets stranded because of this SAA.

7.2.1 (f)

Information on whether the proposed SAA enhances, or at a minimum does not decrease, the reliability of the infrastructure in the area that is the subject of the SAA application and in regions adjacent to the area that is the subject of the SAA application over the long term

The proposed SAA does not decrease the reliability of the infrastructure in the area.

7.2.1 (g)

Information on whether the proposed infrastructure will provide for cost-efficient expansion if there is growth potential in the area that is the subject of the SAA application and in regions adjacent to the area that is the subject of the SAA application

Hydro One has assets that lie along the property that can meet reasonably expected future growth in a cost-efficient manner.

7.2.1 (h)

Information on whether the proposed infrastructure will provide for cost-efficient improvements and upgrades in the area that is the subject of the SAA application and in regions adjacent to the area that is the subject of the SAA application.

The connection is a lies-along connection that provides service to the Customer utilizing Hydro One's existing 8.32kV feeder and has sufficient capacity to serve the forecast load growth of the area.

7.3 IMPACTS ARISING FROM THE PROPOSED AMENDMENT

Description of Impacts

7.3.1

Identify any affected customers or landowners.

The Subject Area is vacant land owned by the Customer. As provided at **Attachment 5**, the Customer supports the proposed amendment. There are no other customers affected.

7.3.2

Provide a description of any impacts on costs, rates, service quality, and reliability for customers in the area that is the subject of the SAA application that arise as a result of the proposed SAA. If an assessment of service quality and reliability impacts cannot be provided, explain why.

Approval of this SAA will not result in any negative impacts on cost, rates, service quality, and reliability for customers in the area that is the subject of the SAA application.

7.3.3

Provide a description of any impacts on costs, rates, service quality, and reliability for customers of any distributor outside the area that is the subject of the SAA application that arise as a result of the proposed SAA. If an assessment of service quality and reliability impacts cannot be provided, explain why.

Approval of this SAA will not result in any negative impacts on cost, rates, service quality, and reliability of any distributor outside the area that is the subject of the SAA application.

7.3.4

Provide a description of the impacts on each distributor involved in the proposed SAA. If these impacts have already been described elsewhere in the application, providing cross-references is acceptable.

Approval of this SAA is not expected to have any material impact on either distributor positively or negatively.

7.3.5

Provide a description of any assets which may be stranded or become redundant if the proposed SAA is granted.

The proposed SAA will not result in the stranding of any assets, nor will any assets be made redundant.

7.3.6

Identify any assets that are proposed to be transferred to or from the applicant. If an asset transfer is required, has the relevant application been filed in accordance with section 86 of the Act? If not, indicate when the applicant will be filing the relevant section 86 application.

No assets will be transferred because of the Application.

7.3.7

Identify any customers that are proposed to be transferred to or from the applicant.

Please refer to 7.1.1 (c).

Provide a description of any existing load transfers or retail points of supply that will be eliminated.

There will be no load transfers or retail points of supply eliminated by the Application.

7.3.9

Identify any new load transfers or retail points of supply that will be created as a result of the proposed SAA. If a new load transfer will be created, has the applicant requested leave of the Board in accordance with section 6.5.5 of the Distribution System Code ("DSC")?

If not, indicate when the applicant will be filing its request for leave under section 6.5.5 of the DSC with the Board. If a new retail point of supply will be created, does the host distributor (i.e., the distributor who provides electricity to an embedded distributor) have an applicable Board approved rate? If not, indicate when the host distributor will be filing an application for the applicable rate.

There will be no new load transfers or retail points of supply created because of the Application.

EVIDENCE OF CONSIDERATION AND MITIGATION OF IMPACTS

7.3.10

Provide written confirmation by the applicant that all affected persons have been provided with specific and factual information about the proposed SAA. As part of the written confirmation, the applicant must include details of any communications or consultations that may have occurred between distributors regarding the proposed SAA.

Hydro One confirms that all affected parties have been provided with specific and factual information about the proposed SAA.

Hydro One has been in communication with Elexicon since September 2023 with meetings scheduled in October 2023. Elexicon is consenting to this Application as evident by the support letter provided in **Attachment 6.**

7.3.11

Provide a letter from the incumbent distributor in which the incumbent distributor indicates that it consents to the application.

Please refer to Attachment 6.

7.3.12

Provide a written response from all affected customers, developers, and landowners consenting to the application, if applicable.

Please refer to Attachment 5.

7.3.13

Provide evidence of attempts to mitigate impacts where customer and/or asset transfers are involved (i.e., customer rate smoothing or mitigation, and compensation for any stranded assets).

Not applicable, as there are no existing customers being transferred as a result of the Application.

7.4 CUSTOMER PREFERENCE

7.4.1

An applicant who brings forward an application where customer choice may be a factor must provide a written statement signed by the customer (which includes landowners and developers) indicating the customer's preference.

Please refer to Attachment 5.

7.5 ADDITIONAL IMFORMATION REQUIREMENTS FOR CONTESTED APPLICATIONS

If there is no agreement among affected persons regarding the proposed SAA, the applicant must file the additional information set out below.

N/A

7.5.1

If the application was initiated due to an interest in service by a customer, landowner, or developer, evidence that the incumbent distributor was provided an opportunity to make an offer to connect that customer, landowner, or developer.

N/A

7.5.2

Evidence that the customer, landowner, or developer had the opportunity to obtain an offer to connect from the applicant and any alternate distributor bordering on the area that is the subject of the SAA application.

N/A

7.5.3

Actual copies of, as well as a summary of, the offer(s) to connect documentation (including any associated financial evaluations carried out in accordance with Appendix B of the Distribution System Code). The financial evaluations should indicate costs associated with the connection including, but not limited to, on-site capital, capital required to extend the distribution system to the customer location, incremental up-stream capital investment required to serve the load, the present value of incremental OM&A costs and incremental taxes as well as the expected incremental revenue, the amount of revenue shortfall, and the capital contribution requested.

N/A

7.5.4

If there are competing offers to connect, a comparison of the competing offers to connect the customer, landowner, or developer.

N/A

7.5.5

A detailed comparison of the new or upgraded electrical infrastructure necessary for each distributor to serve the area that is the subject of the SAA application, including any specific proposed connections.

N/A

7.5.6

Outage statistics or, if outage statistics are not available, any other information regarding the reliability of the existing line(s) of each distributor that are proposed to supply the area that is the subject of the SAA application.

N/A

Quantitative evidence of quality and reliability of service for each distributor for similar customers in comparable locations and densities to the area that is the subject of the SAA application.

N/A

7.6 OTHER

It is the sole responsibility of the Applicant to provide all information that is relevant and that would assist the Board in making a determination in this matter. Failure to provide key information may result in a delay in the processing of the application or in the denial of the application.

Hydro One and Elexicon have identified some legacy customers adjacent to the subject area that are currently being serviced by Elexicon at the following addresses:

582 North St., Newcastle

598 North St., Newcastle

618 North St., Newcastle

656 North St., Newcastle

680 North St., Newcastle

481 Arthur St., Newcastle

As this SAA is focused solely on facilitating the Smooth Run connection, any service territory boundary corrections that may be required relating to these existing connections will not be addressed within this SAA, but within a separate SAA.

7.7 WRITTEN CONSENT/JOINT AGREEMENT

Hydro One Networks Inc. agrees to all the statements made in the Application.
That I
Joanne Richardson
Director – Major Projects and Partnerships
Hydro One Networks Inc.
Dated:July 11, 2024
7.8 REQUEST FOR NO HEARING
Does the applicant request that the application be determined by the Board without a hearing? If yes, please provide: (a) an explanation as to how no person, other than the applicant and the proposed recipient, will be adversely affected in a material way by the outcome of the proceeding AND
(b) the proposed recipient's written consent to the disposal of the application without a hearing.
Hydro One requests the application be determined by the Board without a hearing as no other person will be affected by the Application.
Hydro One has received written support from both Elexicon and the Customer to proceed with this application without a hearing.

Dated: _____

Attachment 1: Map of Service Area

Attachment 2:

Revisions to Description of Service Area

Attachment 2

Schedule 1 Definition of Distribution Service Area of Elexicon Energy Inc. – Veridian Connections Rate Zone

Pages 18 – 19 (of 41)

- 6. Point # 6 is located 0.09 km west of North Street on the south side of the railway. The boundary turns north to point # 7, parallel to North Street.
- 7. Point # 7 is located 0.3 km north of point # 6 and 0.09 km west of North Street. The boundary turns east to point # 8.
- 8. Point # 8 is located to the east of North Street and is located north of Point # 9. The boundary runs between Points #8 and #9 and is parallel to North Street.
- 9. Point # 9 on the west side of North Street along the southern edge of the railway line. The boundary is parallel to the railway line to Point # 10.
- 10. Point #10 is located along the southern edge of the railway line at the west edge of Arthur St. The boundary follows the property boundaries of Point 10A and follows north along Arthur Street to Point #11. Point 10A is an excursion and is included in the Veridian Connections Rate Zone Service Area.

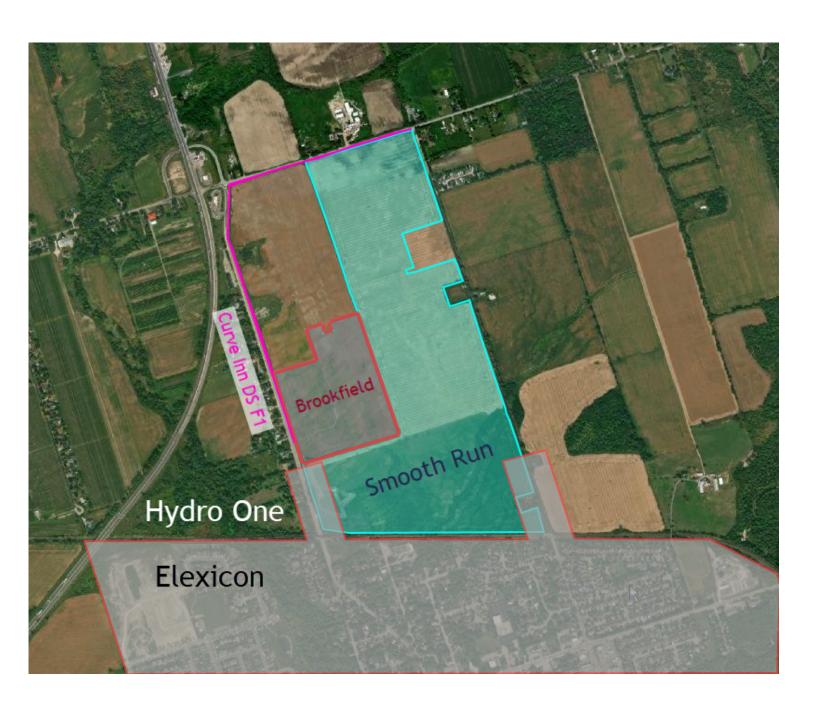
Point No.	Municipal Address	Pin#	Legal Description
<u>10A</u>	220 Arthur St	<u>26653-0020</u> <u>LT</u>	Pt Lt 27 Con 2 Clarke (Newcastle) As In D504907; Clarington

- 11. Point # 11 is located north of Point # 10 and is on the west edge of Arthur Street. The boundary crosses Arthur Street to Point #12.
- 12. Point # 12 is located to the east of Arthur Street and above Point # 13. The boundary is parallel to Arthur Street to Point # 13.
- 13. Point # 13 is located to the right of Arthur Street immediately below the railway line. The boundary is parallel to the railway to point # 14

Notwithstanding the above alpha-numeric point numbers that refer to the reference map provided on page 36 of this of this document for the CLARINGTON – NEWCASTLE SERVICE AREA, the Licensee is authorized to distribute and sell electricity to customers located at the following addresses:

Municipal Address		
582 North St, Newcastle Ontario, L1B 1L9		
598 North St, Newcastle Ontario, L1B 1L9		
618 North St, Newcastle Ontario, L1B 1L9		
656 North St, Newcastle Ontario, L1B 1L9		
680 North St, Newcastle Ontario, , L1B 1L9		
481 Arthur St., Newcastle Ontario, L1B 1L8		

Attachment 3: Geographical Map



Attachment 4: Smooth Run Phasing Plan



Attachment 5: Customer Support Letter



30 Floral Parkway Concord, Ontario L4K 4R1 905.669.5571 info@dggroup.ca dggroup.ca

November 7, 2023

Via E-mail

Hydro One Networks Inc. 483 Bay St., 14th Floor Toronto, ON M5G 2P5

Email: Abdul.Hussaini@hydroone.com

RE: Smooth Run Phase 1 and 2 - Hydro One Service Area

Abdul Hussaini Sr. Network Management Officer (Dx Rationalization) Dx Investment Planning, Dx Asset Management

Dear Abdul,

Please consider this letter as our intent to have Hydro One Networks Inc. (Hydro One) as our service provider for the Smooth Run Phase 1 and 2 developments in Clarington, ON. I am aware that a part of the site we are developing falls within Elexicon Energy Inc. (Elexicon) service territory with the majority falling within Hydro One service territory. We understand that Hydro One will need to file an application to the Ontario Energy Board (OEB) to amend the service area description to include the subject location within Hydro One's service area.

Furthermore, we also request that OEB dispose the Service Area Amendment (SAA) application without a hearing.

If you require anything related to this development, please contact the undersigned.

Smooth Run Development Inc. Corrado Russo Project Manager - Engineering

Your truly,

Original signed by Corrado Russo

Corrado Russo

Project Manager - Engineering

Bringing Life To Land.

Attachment 6: Elexicon Energy Support Letter



Hydro One Networks Inc 483 Bay Street, 7th Floor Toronto, ON, M5G 2P5 Attn: Joanne Richardson

June 28, 2024

RE: Proposed Service Area Amendment – Newcastle Residential Development ("Smooth Run" Phase 1 and 2.)

Dear Ms. Richardson

On August 14, 2023, Hydro One Networks Inc ("HONI") engaged Elexicon Energy Inc ("Elexicon") in discussions related to a Service Area Amendment ("SAA") to accommodate the request of Smooth Run Development Inc. to have HONI as the service provider for its development located at: Part Lots 27 & 28 Concession 2 Clarke, Parts 1, 2, & 3, 40R25837; save and except part 4, 40R31380 and parts 1, 2 & 3, 40R31380; subject to an easement as in DR615691; Municipality of Clarington ("Smooth Run Development").

Elexicon agrees with HONI that a portion of the Smooth Run Development is located in Elexicon's service territory, which includes approximately fifty-five (55) proposed residential units. Appended to this letter of support as Attachment 1 is a map of the affected areas, current as of the date of this letter, indicating the proposed changes to Elexicon's license. This SAA will require an amendment to the description of the Clarington-Newcastle service area at page 18 Appendix B, Schedule 1, Definition of Distribution Service Area of Elexicon Energy Inc., of Elexicon's distribution license (ED-2019-0128). The proposed changes to Appendix B, Schedule 1, pages 18-19, is attached to this letter of support (Attachment 2).

The proposed map, (Attachment 1) will not replace the current map (page 36 of Schedule 1 of ED-2019-0128). The text on page 36 will be modified to "Clarington – Newcastle Veridian Connection's Rate Zone Service Area, excluding Reference Points 8,9, 10,11." The proposed map will be appended to the existing map for the purposes of locating Points 8, 9, 10, 11. The remaining reference points on the existing map on page 36 are unchanged.

The revised boundary lines (represented in blue in Attachment 1) align with HONI's request to accommodate the Smooth Run Development within Elexicon's service territory that are subject of the SAA ("Subject Lands").

This letter confirms that Elexicon will support the SAA to amend Elexicon's service territory to accommodate the Smooth Run Development within the Subject Lands.



Elexicon supports the request to proceed with this application without a hearing.

If you have any questions or concerns, please contact Erin Stevens, Manager, Regulatory Applications and Accounting, at estevens@elexiconenergy.com, or 289 355 9390.

Sincerely,

Original signed by Stephen Vetsis

Stephen Vetsis Vice President, Regulatory Affairs & Stakeholder Relations Elexicon Energy Inc.