



Ontario Federation of Agriculture

Ontario AgriCentre

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ONTARIO ENERGY BOARD

Ms. Kirsten Walli, Secretary
Ontario Energy Board
Ste. 2700 2300 Yonge St.
Toronto, Ontario M4P 1E4

December 5, 2008

EB-2007-0709
Farm Stray Voltage

Dear Ms. Walli:

Attached are the Ontario Federation of Agriculture's comments on the Proposed Amendments to the Distribution System Code that have arisen from EB-2007-0709 in respect of Farm Stray Voltage.

OFA has only one suggestion and that is set out in the attached comments.

I particularly want to say thank you to you and everyone at the Board for the efforts that went into the Farm Stray Voltage consultation. Everyone with the OFA is enormously pleased that the OEB and everyone involved took the time and effort to be so thorough and conscientious in the work. It is a testament to the very positive attitudes and great ability which resides with the OEB and a testament to the fact that Ontario still works for all its residents. We are enormously grateful. Thank you very much!

With respect and best wishes,

Yours truly,

A handwritten signature in blue ink that reads 'Ted Cowan'.

Ted Cowan
For the Ontario Federation of Agriculture

Introductory Comments

The Farm Stray Voltage panel has been exemplary in the most positive sense. Stray voltage was raised for many years by farm hydro customers with varying degrees of success. It came to the fore in the Private Member's Bill introduced by Ms. Van Bommel and was referred to the Minister of Energy who in turn directed the Board to investigate and take action. Everyone associated with this process can take a great deal of satisfaction in knowing that the concerns of ordinary Ontario residents can be and are addressed via due process. The 'system' can and does work. It is thorough and conscientious and that reflects the people who carried the responsibilities of the Farm Stray Voltage Consultation. OFA is pleased to have been a part of this process and is very grateful to everyone at the Ontario Energy Board for coming to understand and address farm stray voltage. It may be a 'small' thing, but it is very important to those who have had to live with it, and the efforts of the panel will make their lives better.

The purpose of the consultation has been to allow the Board to learn about stray voltage and implement measures to ensure that stray voltage does not unduly impact the operation of farms. This purpose does not call for the elimination of stray voltage. That is realistic as Ohm's law is such that there will always be return neutral voltage going to ground and possibly appearing as stray voltage. The intent is to reduce stray voltage so it no longer is disruptive to the operation of livestock farms. This is a realistic and worthwhile objective.

OFA is very pleased with the recommendations made and has supplementary suggestions in only one area, that being the allocation of costs for studies where costs may involve multiple causes of FSV or causes that originate with neighbours. (Page 21 of the report)

Comments on the OEB Suggestions

ACC/ACV Threshold OFA fully accepts the recommendation on page 5 that the animal contact current threshold for action be 2 mA and that the animal contact voltage equivalent be 1 V and is pleased with the suggestion that this threshold can be revisited if need be in the future.

ACC/ACV as Indicator OFA fully accepts that animal contact current and animal contact voltage ought to be the measured indicators of quality of supply with respect to stray voltage. No change is needed in the Neutral to Earth Voltage standards. (pages 6 & 7)

Distributor Contribution of ACC/ACV OFA fully accepts the threshold for distributor contribution which would require action set out on page 11 of 1 mA ACC or 0.5 V ACV. This threshold would put Ontario on par with the leading dairy producing areas in North America and when achieved will effectively eliminate distributor contributions to stray voltage as a problem on farms.

Test Methods OFA fully accepts that allowing distributors to make measurements in the best way they can and developing a more formalized investigation procedure over time is more sensible than prescribing an approach to measurements now. (page 12)

Customer Response Protocol OFA fully accepts that requiring distributors with farm customers to have a customer response protocol is rationale, and further accepts that such a protocol need not be prescribed or the same for every distributor. (page 15)

FSV Reporting OFA accepts the need for LDC reporting of farm stray voltage requests and investigations. The requirement on page 17 will be satisfactory.

Information to Farmers OFA accepts that annual notification to livestock farmers on how information on how to make a stray voltage investigation request will be useful and adequate. (Page 18) OFA is happy to assist in preparing a farm information package of the kind suggested by DFO and in informing farmers on how to request an FSV study and will do these things without charge.

LDC Discretion on Resolution OFA fully accepts that distributors should have discretion as to how to resolve FSV problems. OFA wants resolution of the problems at the lowest reasonable cost to all concerned. (Page 19)

Cost Responsibility for Tests The discussion of allocation of responsibility for costs of tests on page 21 may leave some room for ambiguity. OFA accepts that the distributor should pay for tests where the source is from the distribution system and the farmer where the source is from farm owned wires. Where there are problems on both sides of the panel, costs of tests should be preponderantly with the distributor as tests will have to be more extensive to sort out the sources. If there were no distributor contribution to the problem, tests would likely be simpler and less costly. Accordingly a preponderant burden of cost should be on the LDC in such cases. Where the source of the problem is neither the LDC, nor the customer, but a neighbour (another farm, pipeline, phone line, business) in the absence of OEB guidance, allocation of costs might require a lawsuit which would delay resolution. ***In the rare cases where causes are off farm or shared, in the interests of a speedy resolution it is better if the LDC paid for study costs over and above a pre-set level of \$ 250 which would be paid by the farmer and if the LDC was allowed to recover costs from the third party.***

Training With respect to training OFA accepts that standards, if any, should await the emergence of suitable courses in Ontario and notes that Kinectrics (the former hydro research arm) is interested in offering such courses. (page 22)