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VIA E-MAIL: PartVIConsultation@neb-one.gc.ca

October 18, 2013

Mr. Suchaet Bhardwaj
National Energy Board
444 Seventh Avenue SW
Calgary, Alberta, T2P 0X8

Re: Proposed changes to the National Energy Board Electricity Regulations (File Ad-GA-ActsLeg-Fed-NEBA-Amend 0101)

Hydro One Networks Inc. (“Hydro One”) supports the majority of the proposed changes to the National Energy Board Electricity Regulations (“Regulations”), but offers comments on the proposed changes in PART II: “INFORMATION TO BE FURNISHED BY APPLICANTS FOR PERMITS FOR THE CONSTRUCTION AND OPERATION OF INTERNATIONAL POWER LINES” (IPLs).

The thrust of the Canadian Environment Assessment Act (“CEAA 2012”) is to streamline processes and minimize duplication. Hydro One believes that the proposed changes to the Regulations should be in line with the spirit of CEAA 2012.

As such, Hydro One proposes a small change with respect to environmental assessment requirements in Part II of the proposed Regulations:

Avoiding Duplication with United States Environmental Assessment Requirements

Currently, the construction of any IPLs in the United States will trigger US environmental assessment requirements, which are well established and quite stringent. In addition, according to Section 4 (j) (i) of the proposed Regulations, the applicant will need to also include an environmental assessment report (“EA report”) in the application to the National Energy Board (“NEB” or “Board”), if the IPL extends more than 4 km outside Canada. To avoid duplication (i.e. to prevent applicants from having to produce two separate EA reports, one to fulfill US environmental assessment requirements and another one to fulfill NEB requirements), the following sentence in Part II, section 4(j) (i) should be removed:

“- does not result in more than 4 km of the line extending outside Canada;”

In addition, Hydro One would welcome further initiatives by the Board to streamline processes and minimize duplication. Hydro One would be glad to participate or to provide input should the Board consider making further changes to the Regulations in this direction.

Sincerely,

ORIGINAL SIGNED BY ODED HUBERT

Oded Hubert