

HYDRO ONE INTERROGATORY #11

INTERROGATORY

At page 2, line 28, and page 3, line 1, reference is made to the concepts of “greenfield” and “brownfield” developments. With reference to the usage of these concepts, note that the Ministry of Municipal Affairs and Housing, in addressing the Ontario Government’s brownfield initiatives, explains the principle advantage of brownfields as being the existence of “existing infrastructure”. The Ministry states:

“The Brownfields Statute Amendment Act, 2001 forms part of the government’s Smart Growth strategy to promote and manage growth to sustain a strong economy, strong communities and a clean healthy environment. Redeveloping brownfields encourages smarter patterns of growth because it cleans up contaminated lands, makes more efficient use of existing infrastructure, like roads, sewers and schools, and provides an alternative to developing on greenfields and farmland.”

(http://www.mah.gov.on.ca/userfiles/HTML/nts_1_1579_1.html)

Please indicate why, by Elenchus Research Associates’ usage of the term “brownfield” development, a brownfield development is only one where the existing wires infrastructure is not of use? What would Elenchus call a brownfield development where the existing wires infrastructure can continue to be used? When Elenchus refers to “existing distribution facilities within the area” (page 2, line 30), does Elenchus really mean existing facilities in the area, or does Elenchus mean only those facilities located on the customer’s premises?

RESPONSE

In the Report, the generic terms “greenfield” and “brownfield” are used in the limited context of electric distribution facilities. Consistent with the general concepts, a greenfield distribution development is one where there is essentially no existing distribution facilities (i.e, new facilities will be built from scratch) and a brownfield distribution development is one where there are existing distribution facilities that can be utilized, but significant redevelopment work may be required.

The statement “existing distribution facilities within the area” (page 2, line 30) means “existing facilities in the area being developed or redeveloped”, which could include existing facilities on and outside the development property. The plant requirements would be specific to each customer location and best configuration would be the one



that would minimize the overall connection cost. Hence, the concept is not limited to a demarcation line that strictly aligns with the customer premises or area owned by a developer. For example, in order to serve a brownfield development, the new distributor may need to cross a public road allowance to connect to the host distributor.

Where distribution services can be provided to a brownfield development through new embedded distribution connections, there would be no change in the leveraging of existing assets as envisioned by the Ministry of Municipal Affairs and Housing in the *Brownfields Statute Amendment Act, 2001*.

