March 31, 2014

Director, Spectrum Management Operations
Industry Canada
235 Queen Street
Ottawa, Ontario, K1A 0H5

Re: Canada Gazette, Part I, February 27, 2014, Consultation on Amendments to Industry Canada’s Antenna Tower Siting Procedures, Notice No. DGSO-001-14.

Hydro One Networks Inc. (Hydro One) is a Crown Agency and Crown Corporation of Ontario that delivers electricity to homes and businesses across the province from privately owned generation sources and facilities owned by Ontario Power Generation. Hydro One operates over 29,000 kilometres (km) of high voltage transmission that delivers electricity to large industrial customers and municipal utilities, and a 121,000 km low voltage distribution system that serves about 1.4 million customers and smaller municipal utilities in the province. According to the Amendment to Section 5.1 Antenna Siting Procedures, Hydro One is now referenced within the classification of “Crown Agency”.

Hydro One requires telecommunications structures at a number of their electricity stations in order to provide wireless communication between distributed generation projects and Hydro One’s power system as well as protection and control communication to the power system. The installation of telecommunications structures is an essential component to maintaining a reliable supply of electricity to our customers.

Suggested Amendments to Section 6 of CPC-2-0-03 – Exclusions

It is Hydro One’s opinion that Industry Canada should consider an additional exclusion within Section 6 of CPC-2-0-03, which takes into consideration the unique requirements of our telecommunication facilities.

Hydro One proposes the following exclusion:

a) Where the siting location is within an electrical transformer or switching station.

The rationale for this exclusion is that the current requirement raises expectations that the community can influence the location, height and design. In fact, the siting location, height and appearance of Hydro One's telecommunications structures are inflexible. To facilitate Hydro One’s requirements, telecommunications structures:

- Are always located within electrical transformer or switching stations; and
- Are designed to reflect the topography in the area (i.e. height); and
• Are located within stations containing electrical equipment and adjacent structures, which in many circumstances are larger in height than the proposed telecommunications structure.

Hydro One is requesting the consideration of the aforementioned exclusion as it is our opinion that the requirements for consultation on the siting of telecommunications structures are misemployed under these circumstances.

We appreciate your consideration of our comments and suggestions.

Sincerely,

Brian J. McCormick, Manager
Environmental Engineering and Project Support