

1 Q. C- 35; Volume II, Tab 15: Upgrade Circuit Breakers – Various Sites, page 13: When
2 discussing the continued use of bushings and instrument transformers with PCB
3 concentrations of 500 mg/kg and greater until December 2025, Hydro states that:
4 *“If this regulatory amendment is not granted, the capital investment required for*
5 *oil circuit breaker replacements will increase significantly in 2014.”*

6 If the amendment to allow the continued use of bushings and instrument
7 transformers containing PCB concentrations of 500 mg/kg past December 31, 2014
8 is not granted, please detail the impact on Hydro’s resources as a result of this
9 legislated requirement.
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12 A. If the amendment is not granted, the following outlines the details of the additional
13 Hydro resources required to execute the project using internal labour:

- 14 • Program Manager: 4.2 weeks (0.167 weeks/breaker X 25 breakers);
- 15 • Project Manager: 50 weeks (2 weeks/breaker X 25 breakers);
- 16 • Protection and Control Engineer: 41.75 weeks (1.67 weeks/breaker X 25
17 breakers);
- 18 • Electrical Engineer: 41.75 weeks (1.67 weeks/breaker X 25 breakers);
- 19 • Civil Engineer: 25 weeks (1 week/breaker X 25 breakers);
- 20 • Tradespeople (Electrical): 400 person weeks (4 weeks/breaker for 4
21 tradespeople X 25 breakers); and
- 22 • Protection and Control Technologist: 150 person weeks (3 weeks/breaker
23 for 2 technologist X 25 breakers).
- 24

25 It is also important to note that it is likely this impact on resources will not be
26 realized, as Hydro has received notice from Environment Canada on July 27, 2013
27 that the extension has been placed in the Gazette requesting input on the change

1 prior to finalizing the regulations. See below the notice received by Hydro from
2 Environment Canada.

3 ***“Attention: If you own electrical equipment containing PCBs***

4 *On June 22, 2013, the Regulations Amending the PCB Regulations and Repealing the*
5 *Federal Mobile PCB Treatment and Destruction Regulations were published in*
6 *Canada Gazette, Part I. This publication initiates a 60-day public consultation period*
7 *during which stakeholders may submit comments on the draft text to Environment*
8 *Canada.*

9
10 *If you own electrical equipment that contains PCBs in a concentration of 500 mg/kg*
11 *or more that are used in the generation, transmission or distribution of electricity,*
12 *the following information may be of interest to you.*

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14 *The proposed amendments to the PCB Regulations address a number of issues,*
15 *however, owners of electrical equipment containing high concentrations of PCBs*
16 *(i.e., in a concentration of 500 mg/kg or more), may particularly wish to review the*
17 *proposed text under subsections 16(2.1) and 33(4). Subsection 16(2.1) proposes to*
18 *permit current transformers, potential transformers, circuit breakers, reclosers and*
19 *bushings that were in use on September 5, 2008 and that contain concentrations of*
20 *PCBs equal to or greater than 500 mg/kg and that are located at electrical*
21 *generation, transmission or distribution facilities to remain in service until December*
22 *31, 2025. Subsection 33(4) proposes reporting requirements for this equipment.”*