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BY EMAIL and RESS

January 30, 2013

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2011-140 – East-West Tie Line Designation – Interrogatories

Please find attached the interrogatories of the School Energy Coalition (SEC) in the above-noted proceeding.

Should you require additional information, please do not hesitate to contact me.

Yours very truly,
Jay Shepherd P.C.

Original signed by

Mark Rubenstein

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IN THE MATTER OF sections 70 and 78 of the *Ontario Energy Board Act 1998*, S.O. 1998, c.15 (Schedule B);

AND IN THE MATTER OF a Board-initiated proceeding to designate an electricity transmitter to undertake development work for a new electricity transmission line between Northeast and Northwest Ontario: the East-West Tie Line.

**INTERROGATORIES
ON BEHALF OF THE
SCHOOL ENERGY COALITION**

Interrogatories for All Applicants

1. Please complete the following tables, detailing all transmission projects greater than 20km in length, undertaken by the Applicant, its partners, shareholders, affiliates, or any other entities which the Applicant is relying on for the purposes of its application, in the past 10 years in all jurisdictions.

a. Budgeted Variance Table

Name of Project	Details of Project	Budgeted Cost ^a	Actual Cost	Variance	Reason for Variance

^a Please also provide information on what stage in the process the ‘Budgeted Cost’ was based on (exp. Leave to Construct, successful RFP bid).

b. Schedule Variance Table

Name of Project	Details of Project	Estimated Development and Construction Time	Actual Development and Construction Time	Variance	Reason for Variance

2. With respect to the Development budget:

- a. Please breakout by year, all cost categories and provide amounts for all budgeted expenditures greater than \$25,000.
 - b. Please detail all assumptions made.
 - c. Please explain the rationale for the specific contingency amount budgeted.
3. With respect to the Construction budget:
 - a. Please breakout all cost categories, and provide amounts for all budgeted expenditures greater than \$100,000.
 - b. Please detail all assumptions made.
 - c. Please explain the rationale for specific contingency percentage budgeted.
4. With respect to OM&A budgets:
 - a. For those Applicants who have no provided a OM&A budget, please do so.
 - b. Please breakout all cost categories, and provide amounts for all budgeted expenditures greater than \$25,000. (As an example, please see draft annual budget provided by EWT LP at Ex. 8/p.30).
 - c. Please detail all assumptions made.
 - d. Please explain the rationale for specific contingency percentage budgeted.
5. Has each Applicant included in its development and construction budgets the associated costs with its proposed mitigation strategies for the various risks it has identified in its schedule risk analysis?
6. [UCT, p.119] UCT has proposed using a Guyed-Y tower in place of the self-supported steel-lattice tower as a more cost-effective measure. What is the view of the other Applicants of this proposal?
7. [AOLP, B-98] AOLP has proposed using an alternative H-Frame Structure design along certain areas proposed route. What is the view of the other Applicants of this proposal?
8. Please provide details about all legal actions (by way of appeal, judicial review, or application) undertaken by any party regarding an alleged failure of the Crown's Duty to Consult regarding a project of the Applicant, its partners, shareholders, affiliates, or any other entities which the Applicant is relying on for the purposes of its application.. If a resolution has been reached please provide those details, including a copy of any legal decisions (if applicable).

9. Please provide all of all transmission OM&A benchmarking studies that Applicant, its partners, shareholders, affiliates, or any other entities which the Applicant is relying on for the purposes of its application, has taken part in the last 5 years.

Interrogatories for AltaLink Ontario L.P. (“AOLP”)

10. [B-13, para 145] With respect to the AltaLink Alberta’s partnership with the Piikani and Blood First Nations:
 - a. What is the governance structure of the resulting entity?
 - b. How did the First Nations Entity fund its equity contribution?
11. [A-32, para 146-147] Is AOLP amendable to any other method of recovery of its development costs?
12. [B-18, para 51-52] Please provide the Canadian Electricity Association’s Transmission Committee of Performance Excellence performance benchmark report that is the basis of AOLP’s position that “[f]rom 2006 to 2010, AltaLink performed at or near the top of each of the following CEA recorded performance benchmarks relative to its peers].
13. [B-60, Figure 4.3.6] If different from the previous interrogatory, please provide the Canadian Electricity Association, Transmission COPE 2011 Comprehensive Annual Report which Figure 4.3.6 is reproduced from.
14. [B-98] What is the estimated savings of using the alternative H-Frame Structure design along certain areas of the proposed route?
15. [B-102, para 274] What would be included in the ‘informal progress reports’ that AOLP proposed to file with the Board on a bi-monthly basis?

Interrogatories for Canadian Niagara Power Inc. (“CNPI”)

16. [p.38] Please provide a copy of MOU between FortisOntario and the Lake Hurton Anishinabek Transmission Company (“LHATC”).
17. [p.38] With respect to the Lake Hurton Anishinabek Transmission Company:
 - a. Please outline the governance structure.
 - b. Please provide details about the officers and directors.
18. [p.84] For each listed project, please provide the type of debt instrument(s) utilized, date of issuance, length of term, and debt rate.

19. [p.119] Please provide a copy of the completion report for the Okanagan 230 kV transmission project.
20. [p.122] Please confirm that the service centre Fortis currently operates in Wawa is operated by Algoma Power. If so, are Algoma Power's line crews qualified and trained to conduct maintenance activities on a 230 kV transmission line?

Interrogatories for EWT LP

21. [Ex. 2/p.2] Please provide a copy of the EWT LP partnership agreement.
22. [Ex. 2/p.2-3] Regarding Bamkushwada LP:
 - a. Please outline the governance structure.
 - b. Please provide details about the officers and directors.
 - c. How specifically does it plan to utilize the experience and knowledge of the Participating First Nations?
23. [Ex. 4/p.12] Please list and provide details about *all* transmission projects that Power Engineering has assisted in the design, engineering and construction management in Canada and the United States in the past 10 years.
24. [Ex. 5/p.2-3] Does EWT LP believe that BLP, who currently has no credit rating, will have a material impact on its eventual credit rating.

Interrogatories for Iccon Transmission Inc. and TransCanada Power Transmission (Ontario) L.P. ("Iccon/TPT")

25. [Ex. 2/p.2] What agreement currently governs the joint Iccon/TPT Application? Please provide a copy.
26. [Ex. 2/p.5] Please detail the specific roles each of the Management Team candidates will be undertaking.
27. [Ex. 3/Appendix A, Aboriginal and Stakeholder Engagement Plan, p.10] Please provide a copy of TransCanada's Aboriginal contracting strategy.
28. [Ex. 3/Appendix A, Aboriginal and Stakeholder Engagement Plan, p.12] Please provide a sample copy of a TransCanada Protocol Agreement.
29. [Ex. 5/p.2] Please provide copies of the most recent credit rating reports for each of:
 - a. TransCanada.

- b. TransCanada Pipelines Limited.
 - c. Isolux Corsan Concesiones S.A.U.
 - d. Isolux Ingeenieri.
30. [Ex. 5/p.5-6] For each project on Table 3, please provide the date of each debt issuance and the debt rate of each instrument.
31. [Ex. 8/p.8] Please provide the reasons for the budget variances for each project set out in Table 8.

Interrogatories for RES Canada Transmission LP (“RES”)

32. [Ex. 2/2/p.1-3] For each of RES and MidAmerican Group Power transmission projects listed, please provide the type of debt instrument(s) utilized, date of issuance, the amount of the issuance, length of term, and debt rate.
33. [Ex. P/4/2/p.3] Please provide the charts on pages 3-6 in an excel spreadsheet so that it is clearly visible to the reader (the pdf version is not large enough to clearly read).
34. [Ex. P/6/2/p.1] Is it the position of RES that any First Nation and Métis Impact Benefit Agreement (IBA) is an OM&A cost that should be recovered from ratepayers and not from shareholders?

Interrogatories for Upper Canada Transmission Inc. (“UCT”)

35. [p.22] Please provide a copy of the NextBridge shareholder agreement.
36. [p.76, Figure 10] With respect to the ‘Recent Example of NextEra Project Financings’ table:
- a. Were all of these projects listed financed in 2011? If not, please provide the date of the debt issuance(s).
 - b. For each listed projected, please provide the type of debt instrument(s) utilized, length of term, and debt rate.
37. [p.41, Appendix 5, p.1] Does UCT have a maximum percentage of equity that it is willing to offer to First Nations or Métis owned entities?
38. [Appendix 5, p.2] UCT has proposed that it may be appropriate to provide a one-time lump sum payment to a First Nations or Métis community group. The payment would be considered a capital cost subject to a prudence review. What criteria does UCT believe the Board should use in determining the prudence of a ‘lump sum payment’ to a First Nations or Métis Community?

39. [Appendix 5, p. 2] UCT has proposed that it may be appropriate to consider a similar concept to the current OPA Feed-in-Tariff Program 'First Nation and Métis Adder'. Please provide greater details about how such a program would work in the context of transmission of electricity? Please provide examples to illustrate the proposed concept.

Submitted by the School Energy Coalition on this 30th day of January, 2013.

Original signed by

Mark Rubenstein
Counsel for the School Energy Coalition