



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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September 12, 2018
Our File: EB20170182

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2017-0182/0194/0364 – East-West Tie/Lake Superior Link – SEC Interrogatories

We are counsel to the School Energy Coalition (“SEC”). Pursuant to Procedural Order No.2, attached please find SEC’s interrogatories to the IESO.

Yours very truly,
Shepherd Rubenstein P.C.

Original signed by

Mark Rubenstein

cc: Wayne McNally, SEC (by email)
IESO, Applicants and interested parties (by email)

ONTARIO ENERGY BOARD

**Upper Canada Transmission Inc. (on behalf of NextBridge Infrastructure)
Application for leave to construct an electricity transmission line between
Thunder Bay and Wawa, Ontario**

- and –

**Hydro One Networks Inc. Application to upgrade existing transmission
station facilities in the Districts of Thunder Bay and Algoma, Ontario**

-and-

**Hydro One Networks Inc. Application for leave to construct an electricity
transmission line between Thunder Bay and Wawa, Ontario**

INTERROGATORIES TO THE IESO

ON BEHALF OF THE

SCHOOL ENERGY COALITION

SEC-IESO-1

[p.4] The addendum states that the “IESO does not support allowing the E-W Tie Expansion to be delayed beyond the end of 2022 as the increased risk to system reliability and the associated costs uncertainties are unacceptable.”

- a. Please explain in further detailed why the system reliability risks after 2022 reach a level in which the IESO deems them unacceptable.
- b. At the beginning of which month in 2023 does the IESO believe that risk becomes unacceptable?

SEC-IESO-2

[p.5] In Table 2 the IESO has provided a summary of potential costs of delay to the in-service date for each year between 2020 and 2024. Please provide a breakdown of the potential costs of delay on a monthly basis, beginning in December 2020 (forecast Nextbridge in-service date) until the end of 2024.

SEC-IESO-3

Has the IESO conducted any analysis, either formal or informal, regarding the differences of total system cost the Nextbridge and Hydro One projects based on their differing forecast in-service dates and construction budgets. If so, please provide a copy.

Respectfully submitted on behalf of the School Energy Coalition this September 12, 2018.

Original signed by

Mark Rubenstein
Counsel for the School Energy
Coalition