Board Staff Interrogatories

On Evidence filed by Hydro One Networks Inc.

Application for Service Area Amendment
Ottawa River Power Corporation (ORPC)
EB-2009-0019

1. Reference: Hydro One's Evidence, Page 1, Section 2.0, Lines 20-22

   Hydro One states *"Hydro One provides service to the areas surrounding the 4 licensed service areas of ORPC, including the remainder of the Town of Mississippi Mills outside of Almonte Ward."*

   (a) Please describe the density of Hydro One's distribution system in the area adjacent to the proposed amendment area, from which Hydro One could supply the proposed development (i.e. low, medium, or high) and how does it compare with ORPC's system, from which ORPC proposes to supply the proposed development.

   (b) Please provide a mapping of the area showing Hydro One's distribution systems, the proposed amendment area and the area(s) from which Hydro One intends to supply the proposed development.

2. Reference: Hydro One's Evidence, Page 2, Section 3.2, Lines 28-30

   Hydro One states *"The design and estimating process is progressing and Hydro One will file the Offer to Connect once completed if required"*

   (a) Please provide Hydro One's cost estimate for serving the proposed development in the same manner as ORPC's cost estimates provided in section 3c of its February 22, 2009 evidence. If Hydro One cannot file this information, please provide reasons.

   (b) Please provide the date by which Hydro One expects to complete its Offer to connect the proposed development.

3. Reference: Hydro One's Evidence, Page 4, Section 3.3, Lines 1 and 2

   Hydro One states *"Hydro One contends that ORPC's desire to align its service area to the expanded Almonte Ward boundary is contrary to the RP-2003-0044 Decision with Reasons."*

(a) The Board's Decision with Reasons in RP-2003-0044 states, in part: "*….local distribution companies will profit from early knowledge respecting development in areas contiguous to their highly developed distribution system. In such cases, applications for amendment to service areas, provided they are supported with convincing evidence respecting the fundamental economic efficiency of the proposal, will have good prospect for success."*

i. In light of the above Board statement in RP-2003-0044, please provide information demonstrating that ORPC's application is contrary to RP-2003-0044 Decision with Reasons? If Hydro One cannot provide this information, please provide reasons.

ii. Also in light of the statement above, please explain why service of the proposed amendment area by Hydro One is not contrary to, or is supported by the RP-2003-0044 Decision with Reasons.

4. Reference: Hydro One's Evidence, Page 2, Section 3.2, Lines 18, 24 and 25

Hydro One states *"Like ORPC, Hydro One is well positioned to service this development, should it proceed…..Hydro One contends that its ability to service the site is technically equal to ORPC's"*

Reference: ORPC's Application, Page 4, Section 7

ORPC states *"...we believe with existing facilities of both HONI and ORPC being adjacent to the property that connection costs for both companies will be relatively the same"*

(a) Based on the above statements and other available information on the record of this proceeding, is it Hydro One's position that its ability to serve the proposed amendment area is equal or comparable to ORPC's from the perspective of 1) economic (cost) efficiency, 2) system planning, 3) safety and reliability and 4) rate impact on existing customers?

i. if yes, please provide a detailed explanation addressing each factor and any other factors Hydro One believes are relevant and the reason Hydro One considers them relevant;
ii. if no, please identify the differences between itself and ORPC in respect of the 4 factors identified in (a); or

iii. if Hydro One is unable to respond, please provide reasons for not being able to do so.

(b) In line with item (a) above, please provide the following information:

i. new or upgraded electrical infrastructure necessary to serve the proposed amendment area;

ii. outage statistics or, if outage statistics are not available, any other information regarding the reliability of the existing line(s) that are proposed to supply the proposed amendment area; and

iii. evidence of quality and reliability of service for similar customers in comparable locations and densities to the proposed amendment area.