

Ms.Kristen Walli  
 Board Secretary  
 Ontario Energy Board  
 P.O. Box 2319  
 2300 Young Street, 27th floor  
 Toronto, Ontario  
 M4P 1E4

February 15, 2008

Dear Ms. Walli

VIA EMAIL

RE: EB-2007-0050 - Issues List Submissions.  
 Issues List Submissions:

Pursuant to Procedural Order #4, please find below the suggested additions to the September 26, 2007 issues list.  
 Please note that all additions and alterations are included within the body of the Issues List and are indicated in **red** type, for ease of reference.

## **1.0 Project Need and Justification**

1.1 Has the need for the proposed project been established?

1.2 Does the project qualify as a non-discretionary project as per the OEB's Filing Requirements for Transmission and Distribution Applications and if so what categories of need as referred to in Section 5.2.2 of these Filing Requirements are relevant?

1.3 Have all appropriate project risk factors pertaining to the need and justification (including but not limited to forecasting, technical and financial risks) been taken into consideration in planning this project?

1.4 Is the project suitably chosen and sufficiently scalable so as to meet all reasonably foreseeable future needs of significantly increased or significantly reduced generation in the Bruce area?

**1.5 Can all appropriate project risk factors pertaining to need and justification be taken into consideration prior to the completion of the Environment/Act Terms of Reference and/or Assessment Report?**

**1.6 Has all due diligence required been applied in consideration of the Project Need and Justification?**

## **2.0 Project Alternatives**

**a) Can all of the reasonable alternatives to the project be identified prior to the completion of the Environmental Act Terms of Reference and/or Assessment Report?**

2.1 Have all reasonable alternatives to the project been identified and considered?

**a) Has all due diligence required been applied in identification, consideration and evaluation of all reasonable and applicable alternatives to the preferred option.**

**b) Were any possible alternatives pre-screened by the Applicant, OPA or IESO and excluded from the technical study parameters dictated to the consultants.**

**c) If there were no exclusions of alternatives from the parameters of the consultant's study, were all the consultant's recommendations regarding reasonable alternatives**

**considered or was there a final exclusionary process, precluding further consideration of any of the reasonable alternatives in the process, as identified in the consultant's recommendations?**

**2.2 Has an appropriate evaluation methodology been applied to all the alternatives considered, including the recommendations of the Transmission System Code regarding “good utility practice” per definition 1.2.38**

2.3 For all of the considered alternatives, does the evaluation methodology utilized include a cost benefit comparison as well as a comparison of all quantitative and qualitative benefits.

2.4

a) Have appropriate evaluation criteria and criteria weightings been utilized in the evaluation process for the alternatives and the proposed project and what additional criteria/weightings could be considered?

**a1) Are these evaluation criteria and criteria weightings [2.4 a] consistent with and equal to the current recommendations and requirements of the other NPCC members, the recommendations of NERC, and the recommendations of the Transmission System Code regarding “good utility practice” per definition 1.2.38**

b) Have appropriate comparisons been carried out on all reasonable alternatives with respect to reliability and quality of electricity service, including stability and transient stability levels, voltage performance and Loss of Load Expectation projections under normal and post-contingency conditions?

**b1) Were those comparisons considered relative to the recommendations of the Transmission System Code regarding “good utility practice” per definition 1.2.38**

c) Do the alternatives meet the applicable standards for reliability and quality of electricity service?

**c1) Are these standards [2.4 c] for reliability and quality of electricity service consistent with and equal to the current recommendations and requirements of the other NPCC members and the recommendations of NERC and the recommendations of the Transmission System Code regarding “good utility practice” per definition 1.2.38**

2.5 Is the proposal a better project than the reasonable alternatives?

**2.6 Are the project's rate impacts and costs reasonable for:**

- the transmission line;
  - the station modifications; and
  - the Operating, Maintenance and Administration requirements.
- prior to the completion of the Environmental Act Terms of Reference and/or Assessment Report?**

### **3.0 Near Term and Interim Measures**

3.1 Are the proposed near term and interim measures as outlined in the application appropriate?

**a) Are the proposed near term and interim measures as outlined in the application appropriate in terms of the Transmission System Code regarding “good utility practice” per definition 1.2.38**

**b) Has all due diligence required been applied in identification, consideration and evaluation of all considered, as well as proposed, Near Term and Interim Measures.**

3.2 Can the proposed near term and interim measures be utilized longer than the suggested two to three year time frame?

3.3 If these proposed near term and interim measures could be utilized for a longer period than proposed, could they (or some combination of similar measures) be considered an alternative to the double circuit 500 kV transmission line for which Hydro One has applied?

#### **4.0 Reliability and Quality of Electricity Service**

4.1 For the preferred option, does the project meet all the requirements as identified in the System Impact Assessment and the Customer Impact Assessment?

**a) Are these requirements [4.1] as identified in the System Impact Assessment and the Customer Impact Assessment consistent with and equal to the current recommendations and requirements of the other NPCC members and the recommendations of NERC. and also equal to the standards of installed transmission solutions as defined including the recommendations of the Transmission System Code regarding "good utility practice" per definition 1.2.38**

4.2 Does the project meet applicable standards for reliability and quality of electricity service?

**a) Are these standards [4.2] for reliability and quality of electricity service consistent with and equal to the current recommendations and requirements of the other NPCC members and the recommendations of NERC. and also equal to the standards of installed transmission solutions including the recommendations of the Transmission System Code regarding "good utility practice" per definition 1.2.38**

4.3 Have all appropriate project risk factors pertaining to system reliability and quality of electricity service been taken into consideration in planning this project?

4.4 Do the alternatives meet all the requirements as identified in the System Impact Assessment and the Customer Impact Assessment?

**4.5 Do the alternatives meet applicable standards for reliability and quality of electricity service including the recommendations of the Transmission System Code regarding "good utility practice" per definition 1.2.38**

#### **Comments on the Timeline:**

As per The Ross Firm Group, I agree with and adopt the submissions of Pollution Probe and The Fallis Group with regard to the timeline established in Procedural Order #1., as well as with Ross Firm's statement "Specifically, it is also this writer's opinion that the timeline as set will be oppressive for both the intervenor groups as well as the proponent."

Please contact me if you should you require any disambiguation, additional information or explanation.

Yours truly,  
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cc. G. Nettleton  
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Intervenors

