February 26, 2008

VIA EMAIL & VIA COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St, Suite 2701
Toronto ON M4P 1E4

Dear Ms. Walli:

Board Files No. EB-2007-0050
Hydro One Networks Inc.
Energy Probe – Interrogatories Set # 1

Pursuant to Procedural Order No. 5, issued February 25, 2008, please find 10 hard copies of the Interrogatories of Energy Probe Research Foundation (Energy Probe) Set # 1. An electronic copy of this message will be provided in PDF format.

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

Yours truly,

David S. MacIntosh
Case Manager

cc: Glen MacDonald, Hydro One Networks Inc. (By email)
Michael Engelberg, Hydro One Networks Inc. (By email)
Gordon Nettleton, Osler, Hoskin and Harcourt LLP (By email)
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Interested Parties (By email)

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EB-2007-0050

Ontario Energy Board

IN THE MATTER OF *the Ontario Energy Board Act, 1998*; S.O. 1998, c. 15, (Schedule B) ("the Act");

AND IN THE MATTER OF an Application by Hydro One Networks Inc. pursuant to section 92 of the Act, for an Order or Orders granting leave to construct a transmission reinforcement project between the Bruce Power Facility and Milton Switching Station, all in the Province of Ontario.

INTERROGATORIES OF
ENERGY PROBE RESEARCH FOUNDATION
("ENERGY PROBE")

SET NUMBER 1

February 26, 2008

HYDRO ONE NETWORKS INC.
BRUCE TO MILTON LEAVE TO CONSTRUCT
EB-2007-0050

ENERGY PROBE RESEARCH FOUNDATION

INTERROGATORIES – SET NUMBER 1

Interrogatory # 1

Ref: **Exh. B/T 6/S 5/Appendix 5**
Issue 1.1: **Has the need for the proposed project been established?**

Please provide a breakdown of load carrying capacity of each 500 kV circuit and each 230 kV circuit referenced on page 43 of Appendix 5 along with the actual loading of each circuit on the winter and summer peak day for the past 10 years.

Interrogatory # 2

Ref: **Exh. B/T 6/S 5/Appendix 5**
Issue 1.1: **Has the need for the proposed project been established?**

Please provide historical peak loadings on each 500 kV circuit and each 230 kV circuit referenced on page 43 of Appendix 5 for the summer and winter peak day for the years in which all units at both Bruce A and Bruce B were concurrently available for service.

Interrogatory # 3

Ref: **Exh. B/T 6/S 5/Appendix 5**
Issue 1.1: **Has the need for the proposed project been established?**

Please provide historical capacity factors during the summer and winter peak periods for all generating units at Bruce A and Bruce B from their respective inservice dates to the present.

Interrogatory # 4

Ref: **Exh. B/T 6/S 5/Appendix 5**
Issue 1.1: **Has the need for the proposed project been established?**

Pages 44 - 45 of Appendix 5 project ultimate wind generation capacity in the Bruce area at 1725 MW.

a) **Does this number incorporate capacity reduction factors to account for seasonal and geographical variability of wind generation among the identified wind clusters?**

b) **If not, has HONI, OPA or IESO conducted any studies to determine what the appropriate capacity reduction factors should be? If so, please provide the studies. If not, please explain why this information is not relevant to a determination of the transmission capacity required for the Bruce area.**

Interrogatory # 5

Ref: **Exh. B/T 6/S 5/Appendix 5**
Issue 1.1: **Has the need for the proposed project been established?**

Page 44 of Appendix B concludes that the current nuclear generating capacity at the Bruce site is 5060 MW based on four 890 MW units at Bruce B and two 750 MW units at Bruce A.

Please provide details on how the unit capacities have been arrived at including details of any CNSC operating restrictions that might apply.

Interrogatory # 6

Ref: **Exh. B/T 6/S 5**
Issue 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?**

Page 4 of the referenced section estimates that total combined nuclear and wind generation capacity in the Bruce area could reach 8300 MW by the middle of the next decade.

a) **Please provide details of when Bruce B units will reach the currently projected end of useful life.**

b) How has retirement of Bruce B capacity been considered in the need for additional 500 kV transmission facilities out of the Bruce area?

Interrogatory # 7

Ref: **Exh. B/T 6/S 5**
Issue 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?**

a) How is existing wind generation in the Bruce connected to the 500 kV network?

b) What facilities will HONI need to construct to connect future wind generation in the Bruce to the 500 kV network?

Interrogatory # 8

Ref: **Exh. B/T 3/S 1**
Exh. B/T 6/S 5/Appendix 5
Issue 2.1: **Have all reasonable alternatives to the project been identified and considered?**

The first referenced schedule examines five potential alternatives all of which are at 500 kV.

a) Has HONI, OPA or IESO conducted any studies to determine whether the existing and potential wind generation in the Bruce area could be connected to current or future 230 kV systems?

b) If so, please provide the studies. If not, please explain why such studies are not appropriate to determine alternatives.

Interrogatory # 9

Ref: **Exh. B/T 3/S 1**
Exh. B/T 6/S 5/Appendix 5
Issue 2.1: **Have all reasonable alternatives to the project been identified and considered?**

The second referenced schedule contains plans on page 37 to connect 800 MW of prospective wind generation in the Byng inlet area directly to Essa TS by way of 230 kV lines.

Please explain why 230 kV connection is viable in this situation but not in the Bruce situation.