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BARRISTERS, SOLICITORS & NOTARIES

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February 29<sup>th</sup>, 2008

VIA E-Mail: [info@brucepower.com](mailto:info@brucepower.com)

Bruce Power  
P.O. Box 3000,  
177 Tie Rd.,  
R.R. 2 ,  
Tiverton, ON  
N0G 2T0

Attention: Duncan Hawthorne, C.E.O.

Dear Sir:

**RE: PROPOSED 500 KV TRANSMISSION LINE - BRUCE TO MILTON  
OEB FILE NO. EB - 2007 - 0050**

We are writing to you on behalf of approximately 40 individual interveners, owning approximately 25 parcels of land, known as the "Fallis Group of Intervenors" who have obtained "intervener status" in the above proceedings before the Ontario Energy Board, commenced by the application of Hydro One Networks Inc. ('HONI'), to construct a 180KM transmission line from the Bruce GSS to Milton TS to be in service by December 31, 2011.

The OEB proceedings were initiated on March 29, 2007 by HONI to obtain leave to construct the Transmission Line under Sec. 92 of the OEB Act. Over 4 months later on August 4<sup>th</sup>, 2007 HONI made an application to the Minister of the Environment for Terms of Reference approval for EA Approval by the Minister for the route choices selected by HONI within which it seeks to construct the 500 KV Transmission Line

At issue in the proceedings is whether there is a need to construct a new 500 KV Line for a generation capacity from the Bruce 'A' & Bruce 'B' which will increase from 5,060 MW to 6,560 MW after the bringing into service of Units 1 & 2 of Bruce 'A' presently being re-commissioned for power generation to come on stream within the next 3 years. In short, do the existing 5 transmission lines have the capacity to receive the 6,560 MW of anticipated power to be generated from the 8 reactor units within Bruce 'A' and 'B'?

The OEB Hearings for Leave to Construct are presently scheduled to commence on May 1, 2008. The OEB has directed, in its Procedural Order # 5, that all interveners submit their written interrogatories to the Board and the applicant HONI by March 10<sup>th</sup>, 2007. The OEB has required that full written responses be delivered to the Intervener submitting each Interrogatory within 2 weeks of the request and that if the interrogatory recipient cannot answer any one Interrogatory that it so advise the Intervener and the OEB within 3 business days of the question, ( the 1st business day being the actual date of submission). Failing such advice full answer could be expected to each interrogatory within 2 weeks.

The Interrogatories submitted to HONI by the Fallis Group consisted of in excess 100 questions, the bulk of which required HONI to provide full answers to historic questions involving all 3 nuclear GS at the Bruce including the Douglas Point Reactor, all five transmission lines, ( three 230KV and two 500KV), with technical information questions starting in the mid 1960's until the present. This information is crucial to a full understanding of the present and future transmission capacities of the existing 5 transmission lines running from the Bruce. Without such information a request for a hearings adjournment will be requested by Motion to the OEB which can only delay the construction of the proposed line if approval is eventually granted by the OEB. Without that information it is very conceivable that the OEB may not grant approval until such time as that historic information is made available.

Counsel for HONI advised the OEB and all interveners in writing on February 26<sup>th</sup>, 2008, that the limit of its historic information was 2002 ,and that neither the IESO nor the OPA nor HONI, had any information or access to information on the history of generation levels from each GS and the transmission capacity of each of the 5 transmission lines prior to that year, and it listed a multitude of interrogatories that it could not answer.

As Bruce Power will be recipient of the benefit of the transmission capacity of the proposed new 500 KV Line, it would be deemed in law to be a '*driver*' of the application within the Rules of the OEB. As such the Board Rules mandate that the OEB must test the evidence of the drivers as well, rather than accept hearsay evidence of the Applicant. We believe that Bruce Power will be mandated to provide evidence to the OEB.

Accordingly we enclose at this time a full set of Interrogatory questions which we would request that Bruce Power cause to be fully and completely answered. In the event it is unable to answer any one question, Board Procedural Order # 5, requires you to so advise the Board and the Interveners within 3 business days.

If you do not have information available to answer any one question would you please advise us of your understanding as to where and from whom such answers to such interrogatories might otherwise be readily obtained. Your co-operation and input may serve to shorten proceedings before the Board and result in a much earlier decision and start-up construction should the OEB grant approval to construct.

If you have questions you might submit them to my assistant Donna Love, E-Mail address: [donna.fallaw@bmts.com](mailto:donna.fallaw@bmts.com) . This writer will be out of the office from March 1, returning March 10th

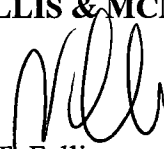
Duncan Hawthorne .C.E.O., Esq

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We would forward to hearing from you. We remain,

Yours truly,

**FALLIS FALLIS & MCMILLAN**

A handwritten signature in black ink, appearing to read 'P. Fallis', written over the printed name.

Peter T. Fallis

PTF:mh  
Encls.

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