

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
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Chris Aristides Pappas
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February 22, 2008

Dear Ms. Walli:

VIA EMAIL

Re: Chris Aristides Pappas - Written Interrogatories - Part 1
ER-2007-0050 - Hydro One - B-Milton Transmission
Reinforcement Project - per Procedural Order #4

Pursuant to the Board's oral decision on February 21, 2008, I submit my first set of written interrogatories to Hydro One, regarding this matter.

Yours truly,
Chris Aristides Pappas

cc: Applicant and Intervenors

PREAMBLE:

The following documents are, in my estimation, entirely relevant and necessary for the understanding of the Board, and the Intervenor, of the Application, the Applicant's preferred option and how that option was deemed to be superior to the alternatives. As was determined at the Issues Day and Schedule Revision hearing [Feb.21, 2008], it is in the best interests of all parties, and the Application process, that these be made immediately available to the Intervenor and the Board for review and consideration. Also, at this time it was, apparently, determined that two of these documents were definitely produced with public availability understood, and that there was no matter of confidentiality for any of the first three documents requested. The Applicant voiced no objection to any of this at the hearing [Feb. 21, 2008]. I must state, here, that I will view non-compliance regarding these initial five interrogatories as a matter of Motion, and will request a Motions day on this basis.

As I understand, the following requests were, however, to be framed as Interrogatory. So that there will be no chance of refusal based on my earlier written request not being precisely framed in Interrogatory format, I have revised them, as follows.

Interrogatory No. 1

Ref. 1) Procedural Order No. 4/APPENDIX B [Leave to Construct Application by Hydro One Networks EB-2007- 0050 DATED February 7, 2008]

2) Direction of Board from Issues Day and Schedule Hearing, February 21, 2008.

Issue Number: 1.1

1.1 Issue: Has the need for the proposed project been established?

Issue Number: 2.1

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

Issue Number: 2.2

2.2 Issue: Has an appropriate evaluation methodology been applied to all the alternatives considered?

Issue Number: 2.4 a)

2.4 a) Issue: 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?

Issue Number: 3.1

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

Request

Can, and will, the Applicant and it's Proponents [OPA, IESO] provide the Intervenors, and the Board, with the relevant documents, studies, consultations or reports, listed below?

1.

IESO_REP_0245v2.0

10-YEAR OUTLOOK:

An Assessment of the Adequacy of Generation and Transmission Facilities to Meet Future Electricity Needs in Ontario From January 2006 to December 2015

[release date: August 15, 2005]

2.

IESO_REP_0299

**CONNECTION ASSESSMENT & APPROVAL PROCESS
SYSTEM IMPACT ASSESSMENT REPORT**

**For the Proposed Installation of Series Capacitors in the 500kV
Circuits between the Bruce Complex & Nanticoke GS**

Applicant: Hydro One Networks Inc.

CAA ID No. 2005-200

Transmission Assessments & Performance Department

FINAL Version

Date: 11th April 2006

3.

**From: Pg. 38 of the SIA REPORT: INSTALLATION OF 500kV SERIES
COMPENSATION [#2, above]**

The study, cited under: 16.2 Recommendations.

• The ABB Study that was commissioned by Hydro One.

Interrogatory No. 2

**Ref. 1) Procedural Order No. 4/APPENDIX B [Leave to Construct
Application by Hydro One Networks EB-2007- 0050 DATED February 7,
2008]**

**2) Direction of Board from Issues Day and Schedule Hearing, February
21, 2008.**

Issue Number: 1.1

1.1 Issue: Has the need for the proposed project been established?

Issue Number: 2.1

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

Issue Number: 2.2

2.2 Issue: Has an appropriate evaluation methodology been applied to all the alternatives considered?

Issue Number: 2.4 a)

2.4 a) Issue: 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?

Issue Number: 3.1

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

Request

Can, and will, the Applicant et al provide these documents, below, immediately, as it is absolutely necessary for the Intervenors to be able to frame Interrogatories based on these and appropriate time for review and production.

1.

IESO_REP_0245v2.0

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[release date: August 15, 2005]

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Date: 11th April 2006

3.

From: Pg. 38 of the SIA REPORT: INSTALLATION OF 500kV SERIES COMPENSATION [#2, above]

The study, cited under: 16.2 Recommendations.

- **The ABB Study that was commissioned by Hydro One.**

Interrogatory No. 3

Ref. 1) Procedural Order No. 4/APPENDIX B [Leave to Construct Application by Hydro One Networks EB-2007- 0050 DATED February 7, 2008]

2) Direction of Board from Issues Day and Schedule Hearing, February 21, 2008.

Issue Number: 1.1

1.1 Issue: Has the need for the proposed project been established?

Issue Number: 2.1

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

Issue Number: 2.2

2.2 Issue: Has an appropriate evaluation methodology been applied to all the alternatives considered?

Issue Number: 2.4 a)

2.4 a) Issue: 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?

Issue Number: 3.1

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

Request

Will the Applicant et al provide these documents, below, as a matter of the record?

1.

IESO_REP_0245v2.0

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[release date: August 15, 2005]

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Date: 11th April 2006

3.

**From: Pg. 38 of the SIA REPORT: INSTALLATION OF 500kV SERIES
COMPENSATION [#2, above]**

The study, cited under: 16.2 Recommendations.

- **The ABB Study that was commissioned by Hydro One.**

Interrogatory No. 4

**Ref. 1) Procedural Order No. 4/APPENDIX B [Leave to Construct
Application by Hydro One Networks EB-2007- 0050 DATED February 7,
2008]**

**2) Direction of Board from Issues Day and Schedule Hearing, February
21, 2008.**

Issue Number: 1.1

1.1 Issue: Has the need for the proposed project been established?

Issue Number: 2.1

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

Issue Number: 2.2

**2.2 Issue: Has an appropriate evaluation methodology been applied
to all the alternatives considered?**

Issue Number: 2.4 a)

**2.4 a) Issue: 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?**

Issue Number: 3.1

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

Request

Will the Applicant et al also provide these documents, below, as hardcopy [printed], so that they can be included in the Application binder with the other documentation relevant to this application, which the Applicant previously provided?

1.

IESO_REP_0245v2.0

10-YEAR OUTLOOK:

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[release date: August 15, 2005]

2.

IESO_REP_0299

CONNECTION ASSESSMENT & APPROVAL PROCESS

SYSTEM IMPACT ASSESSMENT REPORT

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Applicant: Hydro One Networks Inc.

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Date: 11th April 2006

3.

From: Pg. 38 of the SIA REPORT: INSTALLATION OF 500kV SERIES COMPENSATION [#2, above]

The study, cited under: 16.2 Recommendations.

• The ABB Study that was commissioned by Hydro One.

Interrogatory No. 5

Ref. 1)Procedural Order No. 4/APPENDIX B [Leave to Construct Application by Hydro One Networks EB-2007- 0050 DATED February 7, 2008]

2) Direction of Board from Issues Day and Schedule Hearing, February 21, 2008.

Issue Number: 1.1

1.1 Issue: Has the need for the proposed project been established?

Issue Number: 2.1

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

Issue Number: 2.2

2.2 Issue: Has an appropriate evaluation methodology been applied to all the alternatives considered?

Issue Number: 2.4 a)

2.4 a) Issue: 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?

Issue Number: 3.1

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

Request

Will the Applicant provide the Board and the intervenors with the parameters they set for the ABB Study? In fact, will they also supply all pertinent communications between the Applicant and ABB, the consultant, regarding the initiation, terms of reference/parameters, limitations, and undertaking of the consultation/study?

