

March 6, 2008

BY COURIER (10 COPIES) AND EMAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
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Dear Ms. Walli:

**Re: Pollution Probe – Response to Hydro One Letter of February 26, 2008
EB-2007-0050 – Hydro One – Bruce-Milton Transmission
Reinforcement Project**

We write in response to Hydro One's letter to the Board dated February 26, 2008 regarding a lack of historical generation information (which affects responses to Pollution Probe Interrogatories Nos. 1 and 2 regarding the Bruce Nuclear Station). In short, Pollution Probe respectfully submits that Hydro One can provide this information with reasonable effort by obtaining the requested information from Bruce Power and/or Ontario Power Generation Inc. (which are both intervenors in this proceeding).

In its letter dated February 26, 2008, Hydro One advised of areas that would limit Hydro One's ability to provide responses to interrogatories:¹

The first area concerns the availability of historical generation information. Hydro One is not responsible for generation operations and as such it is not in possession of historical generation data. *When interrogatories request generation data Hydro One will consult with the [IESO] and the [OPA] to determine if either of these organizations are able to provide the requested information.*

Hydro One has been advised that *neither the IESO nor the OPA have energy market data that predates 2002*, the year in which the Ontario energy market was restructured. As a result, energy market data requested before this date is not available and cannot be provided in responses to interrogatories. [emphasis added]

We note that Hydro One appears not to dispute the relevance of the affected Pollution Probe interrogatories.

¹ Letter from Gord M. Nettleton, Counsel for Hydro One, to the Board Secretary dated February 26, 2008.

Further, our understanding is that Hydro One will attempt to respond to Pollution Probe Interrogatories Nos. 1 and 2 (which seeks historical information respecting the Bruce Nuclear Station) to the extent that the OPA and IESO have the information, but that a gap arises in that Hydro One essentially cannot provide information prior to May 2002 given the limitation above.² It is that gap which is at issue.

Pollution Probe respectfully submits that Hydro One could in fact fill that gap and provide this information with reasonable effort by obtaining the requested information from Bruce Power and/or Ontario Power Generation Inc. instead. Pollution Probe is frankly surprised and concerned that neither the OPA nor the IESO have historical generation information prior to 2002 (particularly given the pending IPSP). Regardless, Pollution Probe submits that the requested information about the Bruce Nuclear Station should be readily available from Bruce Power (i.e. its current operator) and/or Ontario Power Generation Inc. (i.e. its current owner). Pollution Probe also submits that the requested information can be obtained with reasonable effort and minimal inconvenience since both organizations are already intervenors in this matter.

We hope that Hydro One and these organizations will take the initiative to provide the requested information. However, if necessary, Pollution Probe is prepared to appear before the Board by way of formal motion to obtain full and adequate responses to these interrogatories.

Yours truly,



Basil Alexander

BA/ba

cc: Applicant and Intervenors per Procedural Order #5

² This clarification was provided in an email dated February 29, 2008 from Hydro One's counsel to Pollution Probe's counsel.