

EB-2007-0050

**INTERROGATORIES FOR
THE HONOURABLE GERRY PHILLIPS,
MINISTER OF ENERGY FOR ONTARIO**

Issue Number: 1 Project Need and Justification

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

1. The Auditor General of Ontario reported that prior to the signing of an Agreement between The Ontario Power Authority (OPA) and Bruce Power on October 17th, 2005 for the refurbishment of Units 1 and 2 at The Bruce "A" Nuclear Generating Station (GS), the terms of that Agreement were negotiated with Bruce Power and your government directly and that OPA was directed by The Minister of Energy, by letter, to sign that agreement. Is that correct and if not, why not?
2. When Douglas Point GS was operating while Bruce "A" GS and Bruce "B" GS were also operating in the early 1980's the total generation capacity was 6,760 MW. Do you agree and if not, why?
3. Staff of the Ontario Energy Board have determined that all 8 generating units at Bruce "A" GS and Bruce "B" GS (prior to the de-commissioning of Units 1 and 2 at Bruce "A") had an aggregate generation capacity of 6,560 MW. Do you agree and if not, why not?
4. By the 1980's Ontario had constructed sufficient number of transmission lines to transmit all of the generation capacity of all 3 GS, including Douglas Point, of 6,760 MW of power (namely three 230 KV and two 500 KV lines). Do you agree and if not, why?
5. The Honourable Minister of Energy, Dennis Timbrell, advised the legislature in 1976 that a 230 KV transmission line had the transmission capacity to transmit all of the power generated from 2 units at Bruce "A" GS (namely 1,500 MW). Was the Minister correct and if not, why not?
6. Ontario Hydro constructed three 230 KV lines running from The Bruce, one to Orangeville, one to Owen Sound and one to Detweiler. Would you agree that, if one 230 KV transmission line can transmit 1,500 MW of generated power that three 230 KV lines could, in the aggregate, transmit 4,500 MW of generated power? If not, why not?
7. Hydro One Networks Inc. (HONI) has given notice in material supporting its

application that a 500 KV transmission line is capable of transmitting 3,000 MW of power. Do you agree and if not, why not?

8. There are two 500 KV transmission lines running from the Bruce, one to Milton and one to Longwood. Would you agree that if one 500 KV transmission line can transmit 3,000 MW of generated power that two 500 KV lines, in the aggregate, could transmit 6,000 MW of generated power? If not, why not?
9. If three 230 KV transmission lines can transmit 4,500 MW of generated power in the aggregate and two 500 KV transmission lines can transmit 6,000 MW of generated power in the aggregate would you agree that, in the combined aggregate of three 230 KV lines and two 500 KV lines that all five transmission lines could transmit 10,500 MW of power? If not, why not?
10. Presently, and since 1997, the generating capacity from The Bruce, according to the OPA is 5,060 MW. If the transmission capacity of the 5 transmission lines running from The Bruce is 10,500 MW and The Bruce has been able and capable to transmit all power ever produced from The Bruce, of up to 6,760 MW, do you agree that there is still sufficient transmission capacity in the existing five line electrical highway running from The Bruce to transmit 1,500 MW of power to be generated from re-furbished Units 1 and 2 at Bruce "A" when complete? If not, why not?
11. What, if anything happened or occurred to the overall transmission capacity running from The Bruce to reduce transmission capacity of 10,500 MW (as designed) to 5,060 MW, the present generating capacity of The Bruce Generating Station?
12. Do you agree with OPA and HONI that the present transmission capacity from The Bruce is 5,060 MW? If not, why not?
13. The Independent Electrical System Operators (IESO) released a detailed report (August, 2005) in which the IESO concluded that there was NO need or requirement to build any new transmission lines for the purposes of the refurbishment and the bringing into service of Units 1 and 2 of Bruce "A". Do you agree and if not, why not?
14. Bruce Power made an application to The Canadian Nuclear Safety Commission (CNSC) for initial approval to build a Bruce "C" GS of 4,000 MW generation capacity in December 2006. On April 17, 2007, Ontario Power Generators (OPG) made an application to CNSC for initial approval to build a Darlington "B" GS of 4,000 MW of generation. There are presently two applications therefore before the CNSC. The 20 year Outlook Report of the OP A of 2007 does not make provision for the construction of two separate 4,000 MW Nuclear GS within the next 20 years. Do you agree and if not, why not?

15. The CNSC requires that all Nuclear Generators in Canada store and archive all their records for 75 years after the decommissioning of a generating unit of any nuclear generating station. What time, in terms of year requirements are required by the Ontario Government for storing and archiving of all power generation and power transmission records by all nuclear generators and/or power transmission operators of 230 KV and 500 KV power transmission lines within the province of Ontario?
16. What specific statute, regulation or protocol requirement, if any, sets out such record archiving period as may be identified in the above question?
17. To what corporation or ministry were all records of Ontario Hydro transferred in respect to nuclear power generation and the transmission of all such power from the early 1960's to the transfer of all functions from Ontario Hydro to OPG and/or HONI?
18. HONI has stated that none of the OP A, IESO, or HONI has any records in their archives about any Nuclear Power Operation from The Bruce, or transmission of such power, prior to 2002. If that statement is correct would you please state where such information is now located? How it can be accessed by the Intervenor herein, and the name and contact persons, phone/fax numbers, e-mail for accessing purposes?
19. Has HONI, The IESO or the OPA violated or infringed any government statute regulation, or protocol by failing to archive all nuclear generation and power generation records prior to 2002? If so, please particularize?
20. In the 1970's, Ontario Hydro proposed to build and did build a 500 KV line from The Bruce to Milton and did an Environmental Study of the proposed route/corridor and determined that the 500 KV transmission line should deviate around and avoid the Camp Creek Lowlands in Normanby Township in Grey County. Over the objection of landowners within the deviation route and against the recommendation of the Hearing Officer, Fred Miller, under the *Expropriations Act*, the Honourable James Taylor, the Minister of Energy in 1977, determined that the Camp Creek Lowlands were environmentally sensitive lands warranting protection and he agreed with other Ministers that the Camp Creek Lowlands were a **"No Go Zone"** and that Ontario Hydro would PROTECT THESE LANDS and deviate the 500 KV line around the lowlands. Ontario Hydro constructed that deviated line. HONI has made its present proposal, ignoring Ontario Hydro and proposed to cross these environmentally provincially significant wetlands which are in a total state of nature.
 - A) Will you as Minister, take a pro-active role to direct HONI not to cross these Camp Creek Lowlands which have been protected by your predecessor?

- B) Is there any information that you are now privy to that justifies ruining these Camp Creek Lowlands that your Ministry was not privy thereto in 1977 when the then Minister of Energy intervened to protect those lands?
 - C) Would you now locate and provide to these Intervenors a copy of both of the two Environmental Reports filed with the Ministry of Energy in connection with the construction of the existing 500 KV line from Bruce to Milton?
21. These Intervenors and others have asked the following questions of HONI by way of interrogatories in these proceedings, most of which HONI has refused to answer stating that it has no information or records before 2002. These Intervenors therefore ask the same interrogatories of you to enable them to try and ascertain the fullness of evidence needed to fully respond to the Application of HONI for Leave To Construct a new 500 KV line to Milton, in order that the OEB can have before it the best information possible to enable it to make an informed decision.