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April 23, 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 File No. EB-2007-0050 Hydro One Networks Inc. Leave to Construct Application Energy Probe Interrogatories to Saugeen Ojibway Nations

Attached please find two hard copies of the Interrogatories of Energy Probe Research Foundation (Energy Probe) to the Saugeen Ojibway Nations pursuant to Procedural Order No. 8, issued by the Board on April 7, 2008. An electronic version of this communication will be forwarded in PDF format.

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

Yours truly,

David S. MacIntosh

Case Manager

cc:

Alex Monem, Counsel to Saugeen Ojibway Nations (By email)

Glen MacDonald, Hydro One Networks Inc. (By email)

Gordon Nettleton, Osler, Hoskin and Harcourt LLP (By email)

Peter Faye, Counsel to Energy Probe (By email)

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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.

ENERGY PROBE RESEARCH FOUNDATION INTERROGATORIES TO

SAUGEEN OJIBWAY NATIONS

April 23, 2008

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

ENERGY PROBE RESEARCH FOUNDATION INTERROGATORIES

Interrogatory #1

Ref: Evidence of the Intervenor the Saugeen Ojibway Nations, Affidavit of Whitfield A. Russell, p. 3 of 47

In the section of the evidence entitled Summary of Findings, at paragraph 4 C, the following finding is presented:

Hydro One's faulty assessment of need has resulted in (1) its preference for a proposal that would result in excessive transmission capacity given the existing and committed generation capacity in the Bruce area, and (2) its dismissal of available and reasonable alternatives to its preferred project, including alternatives Hydro One identifies in its application as potential near term and interim measures.

- (a) Has Mr. Russell turned his mind to a question that is of great concern to Energy Probe in this matter: What is the advantage to Hydro One to build excessive transmission capacity?
- (b) Similarly, has Mr. Russell turned his mind to another question that is of great concern to Energy Probe in this matter: What is the advantage to the Ontario Power Authority to direct Hydro One to build excessive transmission capacity?

Interrogatory #2

Ref: Evidence of the Intervenor the Saugeen Ojibway Nations, Affidavit of Whitfield A. Russell, p. 17 of 47

In the section of the evidence entitled Near-Term and Interim Measures Sufficient to Meet Actual Need, at paragraph 22, the author refers to the "circulating loop flow" problem that will be created or exacerbated by reduced system impedance resulting from unused transmission capacity if the proposed line is built.

Has the author conducted any analysis to quantify the loop flow problem that may materialize? If so, please provide the analysis. If not, please explain the basis for making the assumption that loop flows will be exacerbated?