

**ENWIN Utilities Ltd. Interrogatories**  
**Chatham-Kent Transmission Inc.**  
**Application for an Electricity Transmission Licence**  
**EB-2010-0351**

**1. Ref: Transmission Facilities (s. 4, Exhibit G)**

- a) Please confirm that the proposed transmission facilities would create a branch line off of the Hydro One transmission infrastructure and, accordingly, would not be situated between Hydro One transmission infrastructure. For greater clarity, please confirm that the proposed transmission facilities would only be connected to Hydro One transmission facilities at the Demarcation Point shown in Exhibit G.
- b) If the proposed transmission facilities would be connected to Hydro One transmission facilities at any point other than at the Demarcation Point shown in Exhibit G, please detail those connections.
- c) Please confirm that the proposed transmission facilities would not connect to the infrastructure owned by any affiliate. If the proposed transmission facilities would connect to the infrastructure owned by any affiliate, please provide the details of those connections.
- d) Does the 20-year commercial agreement between the Applicant and the Pattern Energy Group infringe on the Board's ratemaking authority? If not, why not. If so, is the Applicant seeking an exemption from the applicable legislation and codes?
- e) Is the Applicant seeking a transmission licence with a geographic limitation for the Municipality of Chatham-Kent or is it seeking a transmission licence without geographic limitation?

**2. Ref: Technical Ability (s. 9)**

- a) Will the Applicant operate as a "virtual transmission company" with all staff housed in affiliates or other companies?
- b) Have any of the key individuals listed on page 13 worked in the transmission sector?
- c) Does the proposal to utilize a confidentiality agreement for shared staff satisfy all the requirements of the Affiliate Relationships Code? If there are other requirements other than transfer pricing, please detail the plan to satisfy those requirements.

**3. Ref: Proposed business transactions impact (s. 17)**

- a) If in the "post-ECT process", pursuant to the "LTEP", or due to any other driver the Applicant proposes to expand its operations beyond the initial project, does the Applicant intend to file an application to amend its licence?

#### **4. Ref: General**

- a) Has the Applicant or its advisors reviewed the business models, organizational structures or other characteristics of the 6 currently licensed transmitters?
- b) If the answer to 4(a) is “Yes”, please provide a comparison of how the proposed business model, structures and other characteristics compare to those other transmitters?