

**Board Staff Interrogatories**

**Application for Service Area  
Amendment**

**Erie Thames Powerlines Corporation  
(ETPC)**

**EB-2011-0085**

April 19, 2011

1. Reference: Page 2, Section 7.1 and Page 8, Section 7.1.6

ETPC states that future phases of Sifton Lands development will include residential single and multi-family block as well as commercial development. Based on the evidence provided, ETPC is only seeking inclusion of Phase 1 and Phase II of residential development in its service territory. ETPC has not identified any future plans to supply power to commercial developments.

- a) Please provide reasons for ETPC not seeking the future expansion of its service territory in relation of this commercial development that is adjacent to the area that is subject of this SAA application.
- b) If Hydro One was to provide connection to future commercial development, would this connection be downstream of the retail point of supply. If yes, please explain how ETPC is planning to address any potential system reliability issues that may arise as a result of this connection.

2. Reference: Page 5, Section 7.1.2

ETPC states *“Board approval of this application would provide a favorable impact on rates for Erie Thames existing 14,459 residential and commercial customers.”*

Please quantify the impact on rates for ETPC’s existing customers as a result of the proposed service area amendment.

3. Reference: Page 5, Section 7.1.2

ETPC states: *“The frequency and duration of power outages on the 38M50 in Hydro One’s service territory negatively impacts Erie Thames customers.”*

- a) Please provide details of the negative impact on ETPC customers of power outages occurring on the 38M50 circuit in Hydro One service territory.

- b) Please explain how the existing situation with power outages would improve if ETPC was to supply the development.

4. Reference: Pages 8, Section 7.2

ETPC states “...*capital plan includes the conversion of an existing customer located on the west side of Harris Street. Erie Thames would coordinate this project with the connection of development subject to this application*”.

- a) Please provide details of the customer conversion project.
- b) Please indicate whether there would be any financial impact on the project if the proposed development would be supplied by the incumbent distributor. If yes, please provide details.
- c) Please indicate whether ETPC’s customer conversion project is contingent upon the proposed service area amendment. If yes, please provide details.

5. Reference: Page 11, Section 7.2.1 (c)

ETPC states: “...*design drawings from the Developer have not been received for Phase II. The cost to supply Phase II has not been included in this SAA application.*”

- a) In light of the above statement, please explain how can ETPC demonstrate that it is better positioned than Hydro One to serve Phase II of the proposed amendment from the perspective of 1) economic (cost) efficiency, 2) system planning, 3) safety and reliability and 4) rate impact on existing customers?
- b) Please provide details regarding Phase II of the development including anticipated timelines for completion of Phase II.

6. Reference: Pages 15, Section 7.3.8

Section 7.3.8 asks for a description of any existing load transfers or retail point of supply that will be eliminated. ETPC states: “approval of *this application will avoid the use of retail point of supply in this area.*”

- a) Please confirm that the existing retail point of supply will be eliminated as a result of the proposed service area amendment.
- b) Please explain how existing customers that are currently supplied through this retail point of supply would be connected to the distribution system.

7. Reference: Pages 16, Section 7.5.3

Section 7.5.3 asks for any financial evaluations carried out in accordance with Appendix B of the Distribution System Code. In addition to costs associated with the connection, applicants are required to provide the present value of incremental OM&A costs and incremental taxes as well as expected incremental revenue, the amount of revenue shortfall and the capital contribution requested.

This filing requirement has not been met by ETPC. Please provide detailed economic evaluation in accordance with Appendix B of the Distribution System Code including relevant assumptions.