

**Erie Thames Powerlines Corporation  
Application for Service Area Amendment  
Board File # EB-2011-0085**

**Erie Thames' Interrogatories re: Hydro One Intervenor Evidence**

**Reference: Hydro One Intervenor Evidence, Question 3**

Interrogatory #1

Hydro One's evidence cites Map 2 in Erie Thames' application and states that the service area boundary is approximately 50 meters north of the northern boundary of the new subdivision. However, Map 2 filed with Erie Thames' application illustrates that the north boundary is contiguous with Erie Thames service territory.

- (a) Please confirm that Erie Thames' service territory is contiguous to the north boundary of the new subdivision or, alternatively, provide additional evidence to suggest otherwise.

**Reference: Hydro One Intervenor Evidence, Question 4**

Interrogatory #2

Hydro One states that the proposed entrance to the development is within Hydro One's service territory and assumes that this will be the supply point for the property.

In its application and supporting evidence, Erie Thames has indicated that it will service the new subdivision via an existing municipal service easement.

- (a) Please confirm that there are no OEB or other prohibitions on supplying a subdivision from an area of the property other than the entrance.
- (b) Are subdivisions always supplied via the entrance to the property?
- (c) Please confirm that the proposed subdivision is currently vacant land and Hydro One has no assets on the subject land.

**Reference: Hydro One Intervenor Evidence, Question 5**

Interrogatory #3

Hydro One states that it will connect the Sifton development using the existing 38M50 feeder and no expansion is required.

- (a) Please confirm that there is no OEB prohibition on expanding the distribution system to connect customers.

- (b) Please confirm that Hydro One will feed the Sifton development from its 38M50 feeder which is supplied by Erie Thames through a retail point of supply.
- (c) Please explain why Hydro One's costs to connect the subdivision (e.g. equipment, labour, etc.) in its Offer to Connect are significantly higher than Erie Thames' if no expansion is required.

**Reference: Hydro One Intervenor Evidence, Question 6**

Interrogatory #4

Hydro One estimates that it could connect the development within 10 working days after OEB approval.

- (a) Does this timeline include the time required to install the necessary underground infrastructure (e.g. trenching, duct work, pulling in cable)?
- (b) Given the estimated short time frame for connection, please explain why Hydro One's connection costs in its Offer to Connect are significantly higher than Erie Thames'.

**Reference: Hydro One Intervenor Evidence, Question 7**

Interrogatory #5

Hydro One states that supply to the area is from the 38M50 sub-transmission feeder from Ingersoll TS.

- (a) Please confirm that the 38M50 that runs from the north boundary to the south boundary of Erie Thames' service territory is solely owned by Erie Thames.

Hydro One states that it has sufficient capacity to supply the development but that it also has long-term plans to extend another circuit into the area.

- (b) Erie Thames has capacity on multiple feeders (38M50 and 38M49) to supply the subject area without additional expansion or costs to existing and/or new customers. Erie Thames submits that using this existing infrastructure is the most economically efficient solution for extra capacity. Please confirm that it would be more prudent and the optimal solution to maximize the capacity of both the Ingersoll M50 and Ingersoll M49 before introducing a new source of supply in the subject area. Assuming that Erie Thames services the subject area and maximizes the existing M50 and M49 feeders, please indicate whether the additional circuit into the area could be delayed.
- (c) Please provide details of Hydro One's long-term plans to extend another circuit into the area, including the cost and economic effect on new and existing customers.
- (d) How will the costs of this extended circuit be recovered? If through the rate base, please explain why the customers in the subject area bare a portion of these costs at this time when there is a more efficient use of the overall distribution system currently available (i.e. maximizing M50 and M49).

- (e) In situations such as emergencies on the 38M50, Erie Thames can supply the area from the 38M49. Hydro One's customers benefit from this. However, if an emergency happens downstream of the retail point of supply, Hydro One cannot offer supply from another source. Please confirm.

**Reference: Hydro One Intervenor Evidence, Question 8**

Interrogatory #6

Hydro One states that, given both parties plan to serve the new development using the 38M50 feeder, the reliability impacts in the new subdivision will be the same regardless of which utility makes the connection.

- (a) Please confirm that, if loss of supply occurs downstream of the retail point in Hydro One's service territory, there is no alternate source of supply further downstream.

**Reference: Hydro One Intervenor Evidence, Question 9**

Interrogatory #7

Hydro One has provided interruption statistics for the section of the feeder near the proposed new connection and they have concluded that the subject area has very good reliability.

- (a) Please confirm that the two outages in 2009 and 2011 were downstream of the retail point of supply. If so, please confirm that Hydro One does not have the capability to backfeed the impacted area to reduce those outage times.

**Reference: Hydro One Intervenor Evidence, Question 10**

Interrogatory #8

Hydro One states all feeders into Ingersoll, including the 38M50 are owned by Hydro One, with system planning and system development done by Hydro One's system planners.

- (a) Please confirm that Hydro One does not control the 38M50 within Erie Thames' service territory, including all retail customers of Erie Thames.
- (b) Please confirm that all feeders into Ingersoll from the wholesale meter point are under the direct control of Erie Thames.
- (c) Please confirm that Erie Thames owns, monitors and maintains the 38M50 within Erie Thames' service territory.
- (d) Please confirm that Hydro One does not do system development or system planning on the 38M50 within Erie Thames' service territory.

**Reference: Hydro One Intervenor Evidence, Question 11**

Interrogatory #9

Hydro One has raised questions regarding the comparison table presented in Erie Thames' application.

- (a) For the convenience of the developer and in an attempt to compare costs using a similar format as Hydro One, Erie Thames' engineering department broke down the charges included in both parties' offer to connect. This comparison table is not the formal offer to connect submitted and accepted in principle by the developer, and the offer to connect governs. Please confirm that Erie Thames' offer to connect, which was accepted in principle by the developer, confirms with the Distribution System Code and it governs over the informal comparison table.

**Reference: Hydro One Intervenor Evidence, Question 12**

Interrogatory #10

Hydro One has prepared a revised comparison table in attempt to compare connection costs.

- (a) In their comparison table, Hydro One has applied a number of assumptions (increases) to Erie Thames connection costs regarding easements, splicing of secondary cable and inspection costs, and reduced Erie Thames connection rebates by approximately 30%. Please provide the rationale and basis for these changes.
- (b) Please confirm that Erie Thames has not made any changes, or applied any assumptions, to Hydro One's offer to connect in its comparison table of the competing offers to connect.
- (c) Please confirm that the spreadsheet is just an informal comparison table subject to interpretation by both parties and that the parties' offers to connect are the governing documents pursuant to the Distribution System Code.

**Reference: Hydro One Intervenor Evidence, Question 13**

Interrogatory #11

Hydro One states that the CDM programs available to the future customers in the new subdivision are comparable or superior to those of Erie Thames.

- (a) In a presentation to the Electricity Distributor Association on May 19, 2011, Hydro One's Director Strategy & Conservation Officer stated that OEB-approved programs "may be needed". Apart from OPA-contracted province wide programs and the PowerSaver Plus program, what regional or local CDM programs have Hydro One had approved by the OEB? What regional or local CDM programs are being considered by Hydro One?
- (b) As the local utility for the majority of the Town of Ingersoll, Erie Thames is the front line for questions from the residents regarding CDM. Please explain Hydro One's local involvement with formal and informal CDM efforts and events in the Town of Ingersoll. Please explain how Hydro

One intends to understand and keep current with the CDM needs and concerns that are specific to the residents of the Town of Ingersoll.

- (c) In the presentation referenced in (a) above, it appears that Hydro One's CDM delivery is still in development. Given this, please provide the basis for the assertion that Hydro One's CDM programs will be comparable or superior to those of Erie Thames.

Hydro One states that customers will have access to a "dedicated team of conservation call agents prepared to assist them with information about conservation".

- (d) In the presentation to the EDA referenced in (a) above, Hydro One discusses the need to outsource its call centre and its "feet on the street". The presentation then states that a weakness of outsourcing these functions is "Less customer interaction/response to customer needs". Please confirm that Hydro One intends to outsource these functions. If so, how does Hydro One intend to address this weakness to ensure that the residents of the Town of Ingersoll receive CDM advice and guidance specific to their local needs? Has Hydro One contracted with third parties to provide these functions? If not, please provide the basis for the statement regarding a dedicated team of conservation call agents.

**Reference: Hydro One Intervenor Evidence, Question 14**

Interrogatory #12

Hydro One states that it plans to have an additional 27.6kV supply to serve the subject area and can be augmented, from new sources that will be built.

- (a) Given its ability to access the 38M50 and 38M49 feeders, Erie Thames can service the subject area in an economically efficient manner that optimizes the use of existing infrastructure and system configuration and which would result in lower incremental connection costs for customers. What is the expected cost for Hydro One's additional 27.6kV supply?
- (b) What are the new sources of supply referenced above and what are the expected costs?
- (c) What are the timelines for the additional 27.6kV supply and the new sources referenced above?
- (d) If Hydro One supplies the subject area, what portion of this expansion should be allocated to this new development?
- (e) If Hydro One introduces a new source of supply via a new 27.6kV circuit, would Hydro One need to take a new route to feed the subject area? If so, would it be substantially longer than the more direct supply route proposed by Erie Thames in its application? If yes, would this result in higher reliability risks for the subject area?

**Reference: Hydro One Intervenor Evidence, Question 15**

Interrogatory #13

Hydro One states that there will be no rate impacts on Hydro One Networks existing customers as a result of the new connection.

- (a) Will there be rate impacts on existing and future customers if Hydro One introduces the long-term plan referenced in Hydro One's Intervenor Evidence Questions 7 and 11 in order to adequately supply the subject area?

**Reference: Hydro One Intervenor Evidence, Question 16**

Interrogatory #14

Hydro One states that Erie Thames application will decrease the smoothness of the service territory boundaries.

- (a) Erie Thames currently supplies the Ing-Wood subdivision to the east of Harris Street (see Map 2B in Erie Thames' application) which was subject to an uncontested service area amendment application (EB-2007-0774). This application was supported by Hydro One. Please explain the differences between the proposed Sifton subdivision and the Ing-Wood subdivision from the perspective of border smoothness concerns.

Hydro One states that the addition of the subject development would utilize existing infrastructure. However, in Hydro One's Intervenor Evidence Questions 7 and 14, Hydro One references additional supply plans in the future are required to the service the subject area.

- (b) Please explain the discrepancy between these two statements.

Hydro One contends that the customers served by Hydro One have similar characteristics to the customers expected in Phase I and the future Phase II and commercial phase of the development.

- (c) Please confirm that Erie Thames' customers in the service area that is contiguous to the proposed development have similar characteristics to the expected customers in this subject area.

**Reference: Hydro One Intervenor Evidence, Question 17**

Interrogatory #15

Hydro One has submitted that there are no compelling reason that Erie Thames' solution is a more rational or efficient realignment.

- (a) Erie Thames has submitted that (i) Erie Thames is contiguous to the subject area, (ii) Erie Thames offers lower rates to its end users, (iii) Erie Thames has the existing infrastructure and backup feeders to supply the subject area which would be maximized before a new source of supply is required, (iv) the developer and the Town of Ingersoll support Erie Thames' proposal, (v) Erie Thames offers a lower connection cost, and (vi) there are currently no Hydro One assets on the subject property. Please confirm that Hydro One contends that none of the above are compelling reasons for a rational and efficient realignment.