# **KLIPPENSTEINS**

## BARRISTERS & SOLICITORS

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September 4, 2012

## **BY COURIER (2 COPIES) AND EMAIL**

## Ms. Kirsten Walli

Board Secretary Ontario Energy Board P.O. Box 2319 2300 Yonge Street, Suite 2700 Toronto, Ontario M4P 1E4 Fax: (416) 440-7656 Email: boardsec@oeb.gov.on.ca

Dear Ms. Walli:

## Re: Pollution Probe – Interrogatories EB-2012-0031 – Hydro One Networks Inc. 2013-2014 Rates

Enclosed please find Pollution Probe's interrogatories for the above matter.

Please do not hesitate to contact me if anything further is required.

Yours truly,

Kent Elson

Encl.

## Hydro One Networks Inc. 2013-2014 Rates EB-2012-0031

## **Pollution Probe Interrogatories for Hydro One**

## Issue No. 11: Are the amounts proposed for rate base in 2013 and 2014 reasonable?

Part A: Interrogatories Regarding Proposed Oshawa Area Transformer Station Reference for below interrogatories: Exhibit D1, Schedule 3, Tab 3, Appendix B

## **11-Pollution Probe-1**

Please provide a map showing the location and boundaries of the eastern part of the Greater Toronto Area ("East GTA") as referenced on page 1 of Appendix B.

#### **11-Pollution Probe-2**

Please state the annual energy consumption (GWh) and annual peak demand (MW) of the East GTA for each of the last ten years.

### **11-Pollution Probe-3**

Please provide a forecast of energy consumption and annual peak demand of the East GTA for each year from 2012 to 2022 inclusive.

### **11-Pollution Probe-4**

According to page 5 of Appendix B: "Installing new generation totalling 1,000 MW close to Cherrywood TS would be required to meet the required supply reliability in the East GTA."

- a. Could the required supply reliability also be met by 1,000 MW of conservation and demand management ("CDM")? If no, why not?
- b. Could the required supply reliability be met by a combination of 1,000 MW of new generation and of CDM? If no, please explain why not?

#### **11-Pollution Probe-5**

Please state the number of *peaksaver* participants in the East GTA and their potential to reduce peak day demand.

#### **11-Pollution Probe-6**

Please state the forecast number of *peaksaver* participants in the East GTA on December 31, 2014 and their forecast potential to reduce peak day demand.

#### **11-Pollution Probe-7**

Please state the maximum potential number of *peaksaver* participants in the eastern GTA and their potential to reduce peak day demand.

## **11-Pollution Probe-8**

Please state the Ontario Power Authority's ("OPA") existing non-residential demand response capability (e.g., DR1, DR2, DR3) in the East GTA.

## 11-Pollution Probe-9

Has Hydro One and/or the OPA estimated the East GTA's potential for incremental costeffective energy efficiency programs and cost-effective demand response programs (e.g. in terms of energy in MWhs and peak demand reductions in MW)? If yes, please provide Hydro One's and the OPA's estimates and the studies and analyses that support these estimates.

## **11-Pollution Probe-10**

Please provide Hydro One's and/or the OPA's estimates of the avoided cost of new electricity supply (kW and kWh) in Ontario for each of the next 10 years, including the costs of generation, transmission, and distribution (i.e. the cost that can be avoided if new electricity supply is not needed). Please provide the studies, analyses and input assumptions that support these avoided cost estimates.

## **11-Pollution Probe-11**

Please provide Hydro One's and/or the OPA's estimates of the number of commercial, institutional, multi-residential and industrial diesel back-up generators and their aggregate capacity in the East GTA.

## **11-Pollution Probe-12**

Please provide Hydro One's and/or the OPA's estimate of the incremental demand response capability that could be obtained in the East GTA by installing natural gas-fired back-up generators in commercial, multi-residential, institutional and industrial locations that have diesel back-up generators?

## **11-Pollution Probe-13**

Please provide Hydro One's and/or the OPA's estimate of the economic potential for natural gas-fired combined heat and power ("CHP") in the East GTA (i.e. in MW). Please provide the studies, analyses and input assumptions that support these estimates.

## **11-Pollution Probe-14**

Please provide a break-out of Hydro One's and/or the OPA's estimate of the economic potential for natural gas-fired CHP in the East GTA for the following sectors: (a) industrial, (b) commercial, (c) institutional, and (d) multi-residential. Please also include a break-out by the following sizes: (a) less than 10 kW, (b) 10 to 50 kW, (c) 51 to 100 kW, (d) 101 to 500 kW, (e) 501 to 999 kW, (f) 1 to 5 MW, (g) 5.1 to 10 MW, (h) 10.1 to 20 MW, (i) 20.1 to 50 MW, (j) 50.1 to 99 MW, (k) 100 to 200 MW, and (l) greater than 200 MW.

## **11-Pollution Probe-15**

Please provide an excel spreadsheet with the electricity demand in the East GTA during every five minute interval in 2011.

Part B: Interrogatories Regarding Proposed Guelph Area Transmission Project Reference for below interrogatories: Exhibit D1, Tab 3, Schedule 3, Appendix E

## **11-Pollution Probe-16**

Please state the annual energy consumption (GWh) and annual peak demand (MW) of the South-Central Guelph area for each of the last ten years.

### **11-Pollution Probe-17**

Please state the forecast energy consumption and annual peak demand of the South-Central Guelph area for each year from 2012 to 2022 inclusive.

## **11-Pollution Probe-18**

Please state the number of *peaksaver* participants in the South-Central Guelph area and their potential to reduce peak day demand.

#### **11-Pollution Probe-19**

Please provide a forecast number of *peaksaver* participants in the South-Central Guelph area on December 31, 2014 and their forecast potential to reduce peak day demand.

## **11-Pollution Probe-20**

Please state the maximum potential number of *peaksaver* participants in the South-Central Guelph area and their potential to reduce peak day demand.

#### **11-Pollution Probe-21**

Please state the OPA's existing non-residential demand response capability (e.g., DR1, DR2, DR3) in the South-Central Guelph area.

## **11-Pollution Probe-22**

Has Hydro One and/or the OPA estimated the South-Central Guelph area's potential for incremental cost-effective energy efficiency programs and cost-effective demand response programs (e.g. in terms of energy in MWhs and peak MW demand reductions in MW)? If yes, please provide Hydro One's and the OPA's estimates and the studies and analyses that support these estimates.

#### **11-Pollution Probe-23**

Please provide Hydro One's and/or the OPA's estimates of the number of commercial, institutional, multi-residential and industrial diesel back-up generators and their aggregate capacity in the South-Central Guelph area.

## 11-Pollution Probe-24

Please provide Hydro One's and/or the OPA's estimate of the incremental demand response capability that could be obtained in the South-Central Guelph area by installing natural gas-fired back-up generators in commercial, multi-residential, institutional and industrial locations that have diesel back-up generators?

## **11-Pollution Probe-25**

Please provide Hydro One's and/or the OPA's estimate of the economic potential for natural gas-fired combined heat and power (CHP) in the South-Central Guelph area (i.e. in MW). Please provide the studies, analyses and input assumptions that support these estimates.

#### **11-Pollution Probe-26**

Please provide a break-out of Hydro One's and/or the OPA's estimate of the economic potential for natural gas-fired CHP in the South-Central Guelph area in the following sectors: (a) industrial, (b) commercial, (c) institutional, and (d) multi-residential. Please also include a break-out by the following sizes: (a) less than 10 kW, (b) 10 to 50 kW, (c) 51 to 100 kW, (d) 101 to 500 kW, (e) 501 to 999 kW, (f) 1 to 5 MW, (g) 5.1 to 10 MW, (h) 10.1 to 20 MW, (i) 20.1 to 50 MW, (j) 50.1 to 99 MW, (k) 100 to 200 MW, and (l) greater than 200 MW.

#### **11-Pollution Probe-27**

Please provide an excel spreadsheet with the electricity demand in the South-Central Guelph area during every five minute interval in 2011.

## **11-Pollution Probe-28**

Please list the members and their affiliations of the Kitchener-Waterloo-Cambridge-Guelph Area Working Group. Were any of Hydro One's ratepayer or environmental intervenors invited to join this Working Group? If yes, please provide their names. If no, please explain why not.

#### **11-Pollution Probe-29**

Please provide copies of all of the reports of the Kitchener-Waterloo-Cambridge-Guelph Area Working Group.