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File 20412

January 30, 2013

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**VIA COURIER and RESS FILING**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> Floor  
Toronto ON M4P 1E4

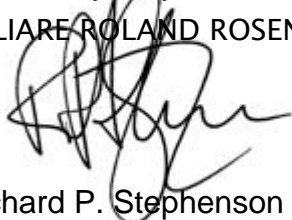
Dear Ms. Walli

**Re: East West Tie Line Transmitter Designation Proceeding  
Power Workers' Union Interrogatories to CNPI  
Board File No. EB-2011-0140**

We are retained to act as counsel to Power Workers' Union. We enclose the Interrogatories of Power Workers' Union in connection with these proceedings.

Yours very truly,

PALIARE ROLAND ROSENBERG ROTHSTEIN LLP



Richard P. Stephenson  
RPS:jr  
encl.

Doc 854805v1

HONORARY COUNSEL

Ian G. Scott, Q.C., O.C.  
(1934 - 2006)

**IN THE MATTER OF** sections 70 and 78 of the *Ontario Energy Board Act 1998*, S.O.1998, c.15, (Schedule B);

**AND IN THE MATTER OF** a Board-initiated proceeding to designate an electricity transmitter to undertake development work for a new electricity transmission line between Northeast and Northwest Ontario: the East-West Tie Line.

**POWER WORKERS' UNION INTERROGATORIES  
to Canadian Niagara Power Inc. (CNPI)**

**PWU Interrogatory #1**

**Ref: Section 8, Sub section 8.7, Page 116 of 160, Lines 4-8 (an estimated budget for the construction of the line)**

In the above reference, CNPI provides a table showing an estimate of the construction cost for the East-west Tie Line. The table shows that CNPI's estimate of the construction cost is \$583,969,000M (including interest during construction). At the bottom of the table (Lines 6-8), CNPI states:

**The level of project definition for the East West Tie falls into the Proposed Project Stage, as defined below. Therefore the construction estimate should be considered as Conceptual with a target accuracy of negative 25% to positive 50%.**

- a) Please provide the range of values for construction cost based on the assumed target accuracy of negative 25% to positive 50% (i.e. provide the high and low values of construction cost).