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April 28, 2008

BY EMAIL & COURIER

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge St, Suite 2701  
Toronto ON M4P 1E4

Dear Ms. Walli:

**Board File No. EB-2007-0681**

**Hydro One Networks Inc. – 2008 Rates Rebasing Application  
Energy Probe Interrogatories of Milton Hydro**

Pursuant to Procedural Order No. 2, issued February 22, 2008, please find three hard copies of the interrogatories of Energy Probe Research Foundation (Energy Probe) in respect of Evidence filed by Milton Hydro Distribution Inc. An electronic version of this communication will be forwarded in PDF format.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh  
Case Manager

cc: Tom Brett, Gowlings LLP (By email)  
Mary-Jo Corkum, Milton Hydro Distribution Inc. (By email)  
Glen MacDonald, Hydro One Networks Inc. (By email)  
Peter Faye, Energy Probe Counsel (By email)

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**Ontario Energy Board**

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

**AND IN THE MATTER OF** an Application by Hydro One  
Networks Inc. for an order approving or fixing just and  
reasonable rates and other charges for the distribution of  
electricity.

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**INTERROGATORIES OF  
ENERGY PROBE RESEARCH FOUNDATION  
("ENERGY PROBE")**

**to**

**MILTON HYDRO DISTRIBUTION INC.**

**April 28, 2008**

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**HYDRO ONE NETWORKS INC.  
2008 RATES REBASING  
EB-2007-0681**

**ENERGY PROBE RESEARCH FOUNDATION  
INTERROGATORIES – MILTON HYDRO DISTRIBUTION INC.**

**Interrogatory # 1**

**Ref: Evidence of Milton Hydro, p. 3 of 7**

**The evidence of Milton Hydro at Paragraph 5, references RP-2000-0023 a previous Hydro One Distribution rate case. In this case the definition of “Specific Lines” was apparently:**

**“those within the boundary of an LDC and serving only the customers of that LDC”**

**Please explain:**

- (a) Is this still the definition of Specific Lines for the purposes of EB-2007-0681?**
- (b) If not what is the current definition of Specific Lines?**
- (c) If yes, how should this be reconciled with the statement in Paragraph 17 of the Milton Hydro evidence that “The M1 and M3 feeders therefore meet the current definition of a specific LV line in that they lie entirely *within either the transmission station property or Milton Hydro’s service area*”? (emphasis added) i.e. If part of a feeder lies partly outside of Milton Hydro’s service area how can it lie “within the boundary of an LDC...” per the definition in paragraph 5?**

## **Interrogatory # 2**

### **Ref: Evidence of Milton Hydro, Diagram**

**The schematic accompanying the evidence shows other feeders serving Oakville Hydro. If feeders on Hydro One property do not lie within an LDC service territory, please explain:**

- (a) How are the M7 and M8 feeders treated? They appear from the schematic to be owned by Hydro One and feed only Oakville Hydro customers. Are these feeders categorized as Specific or Shared feeders? If Specific why are they treated differently than Milton's M1 and M3? If Shared, does Oakville Hydro have the same complaint about charges that Milton has?**
- (b) How are feeders on Hydro One transmission rights of way within one LDC but feeding only the customers of another LDC treated? Are they Specific or Shared facilities?**
- (c) Why are M7 and M8 feeders serving Oakville Hydro owned by Hydro One from the breaker position to the boundary while the M2 and M4 appear to be wholly owned by Oakville Hydro?**
- (d) If Oakville Hydro can own feeders right up to the breaker position on Hydro One property, can Milton Hydro do the same? If yes, why doesn't Milton purchase the .24 km of line and avoid paying any Shared facility charges? If no, why is Milton treated differently than Oakville?**