

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

AND IN THE MATTER of an Application by wpd White Pines Wind Inc. for an Order or Orders pursuant to Section 92 of the Ontario Energy Board Act, 1998 granting Leave to Construct transmission facilities in Prince Edward County.

**INTERROGATORIES OF THE ALLIANCE TO PROTECT PRINCE EDWARD COUNTY
 (“APPEC”) RE DOCUMENTS FILED BY WPD WHITE PINES ON OCTOBER 24, 2014**

APPEC Interrogatories re System Impact Assessment Report Addendum

1.

- (a) The Overview of Impact Assessment (the “Overview”) in the Leave to Construct Application¹ notes that “the SIA and CIA reports were prepared with respect to the 69 kV overhead transmission line originally proposed by the Applicant” and that as a result of the modification to the proposed transmission line on July 24, 2013 wpd White Pines applied to the IESO for an amended SIA. What (if any) other changes to the project plans was the IESO informed of since 2011 when these reports were prepared?
- (b) The Overview focuses on the fact that the 69 kV transmission line was changed from an overhead to an underground line. On July 24, 2013 or at any time thereafter was the IESO specifically informed about the change in the transmission line length from 24 km to 28 km that was made after the 2011 System Impact Assessment and Customer Impact Assessment?
- (c) The Notification of Conditional Approval for the amended SIA states the connection applicant has notified the IESO that they will make the following changes to the original proposal:

- 1. Install 28 km underground cable instead of overhead line for the 69 kV tap line;

Please confirm that one of the changes to the original proposal was to extend the 69 kV tap line from 24 km to 28 km and that another change was to install a 69 kV tap line using underground cable instead of overhead line.

¹ EB-2013-0339, Exhibit H, Tab 1, Schedule 1

2.
 - (a) The addendum that was filed with the Board on October 23, 2014 appears to be an addendum to an already-existing document and as such implies that the 2011 System Impact Assessment Report and conditional approval is still valid. What is wpd White Pines seeking approval for in this leave to construct application: the 2011 System Impact Assessment Report and conditional approval (for a 24 kilometre overhead line) AND the System Impact Assessment Report Addendum?
 - (b) In the event that during the construction process it is found that the 69 kV transmission line is unable to be buried is wpd White Pines prepared to make use of the 2011 Conditional Approval?
3. In the Overview it is noted that “the applicant will adhere to the requirements stipulated in the SIA, the CIA, and the addendums to the SIA and CIA, if any, in constructing the Transmission Project”. As pointed out above, the 2011 SIA and CIA were each prepared with respect to a 69 kV overhead transmission line 24 kilometres in length. Please explain how wpd White Pines proposes to adhere to the requirements stipulated in both SIA Reports given the specific nature of the scope and requirements of each.
4. In its Argument in Chief filed on August 6, 2014 wpd White Pines states that “The Applicant will construct the Transmission Project in accordance with the reasonable connection requirements contained in the amended SIA.” Please explain what a “reasonable” connection requirement would mean in the context of this application. In the event that one or more connection requirements in the amended SIA are considered unreasonable can wpd White Pines opt to follow 2011 SIA connection requirements instead?

APPEC Interrogatories re email communications between the wpd White Pines, the IESO, and Hydro One from August 14, 2013 to October 20, 2014 regarding the Customer Impact Assessment

5. Please confirm that the report attached to the January 29, 2014 email from the IESO to Hydro One with the subject line: “FW: Transformer parameters and D-VAR model” is the final version of the System Impact Assessment Report Addendum. If this was not the final version but rather a draft please wpd White Pines advise as to the state of its completeness or provide a copy of the draft.
6. It is clear from the February 19, 2014 email that Hydro One was aware of some project changes to the White Pines Wind Farm but it is unclear as to what they are. Please provide clarification on this.
7. The 2011 Customer Impact Assessment that was filed with the application is based on a proposal by wpd White Pines to participate in a joint effort with Hydro One to construct a transmission line that would result in an increase in the available power supply to the Picton area. Furthermore basic project details in the Customer Impact Assessment (“24 km 69 kV overhead line”) are obviously incorrect.²

Was Quyet Diep at Hydro One informed of the project modification to bury the transmission

² Customer Impact Assessment dated October 21, 2011 [1.0 Introduction]

line? Was Mr. Diep informed of other significant modifications to the transmission project which had occurred since 2011?

Date: November 26, 2014

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