



**BY EMAIL and RESS**

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Ontario Energy Board  
2300 Yonge Street  
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December 21, 2017  
Our File: EB20170182

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2017-0182/194 – East-West Tie LTC – SEC Interrogatories**

We are counsel to the School Energy Coalition (“SEC”). Pursuant to Procedural Order No. 1, please find SEC’s interrogatories to both Upper Canada Transmission Inc. (Nextbridge) and Hydro One Networks Inc.

Yours very truly,  
**Shepherd Rubenstein P.C.**

*Original signed by*

Mark Rubenstein

cc: Wayne McNally, SEC (by email)  
Applicant and interested parties (by email)

**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 Upper Canada Transmission, Inc. under section 92 of the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15 (Schedule B) for an Order or Orders granting leave to construct a new double circuit 230 kV electricity transmission line between Thunder Bay and Wawa

**AND IN THE MATTER OF** an Application by Hydro One Networks Inc. pursuant to s. 92 of the 6 Act for an Order or Orders granting leave to upgrade existing transmission station facilities in the Districts of Thunder Bay and Algoma.

**INTERROGATORIES**

**ON BEHALF OF THE**

**SCHOOL ENERGY COALITION**

**Upper Canada Transmission Inc. (“Nextbridge”)**

**SEC-UCT-1**

Please place all Nextbridge evidence, interrogatory responses and submissions from EB-2011-0140 on the record in this proceeding. [Note: It is sufficient for SEC’s purposes for Nextbridge to agree to simply deem the materials as part of the record in this proceeding].

**SEC-UCT-2**

Please place all project Nextbridge monthly and quarterly reports filed with the Board on the record in this proceeding. [Note: It is sufficient for SEC’s purposes for Nextbridge to agree to simply deem the materials as part of the record in this proceeding].

**SEC-UCT-3**

Please provide a copy of the governing Nextbridge shareholders agreement and partnership agreement of NextBridge Infrastructure LP.

**SEC-UCT-4**

[EB-2011-0140 UCT Designation Application, p.80] Please add a column to Figure 11 to show the project specifications for the project in this LTC application.

**SEC-UCT-5**

[B-1-1, Attach 1] Please provide a detailed project work schedule.

**SEC-UCT-6**

[B-9, p.1] Please add two columns to Table 2 to show the cost estimate at the time of the designation application, and the cost estimate at the time of the designation application in 2020 dollars (i.e. on the same basis as the current forecast construction cost estimate).

**SEC-UCT-7**

[B-9-1, p.3] Has Nextbridge completed the RFP process to date? If so, please provide full details of the contracts signed and provide copies of them.

**SEC-UCT-8**

[B-9-1, p.3] For each individual RFP, please provide the scope of the work and the type of arrangement that is to be contracted (i.e. fixed price, target price, etc.).

**SEC-UCT-9**

[B-9-1, p.8-9] Nextbridge states that changes were made to the design during the designation phase in response to concerns raised by stakeholders. Please provide a summary of comments provided by stakeholders regarding the project, Nextbridge's response to them, and if they did/would have had a material impact on the cost of the project.

**SEC-UCT-10**

[B-9-1, p.7-11] Nextbridge has provided a list of reasons why the cost estimates have increased since the designation application under 4 different categories. Please further break down each category, by each of the listed reasons for the cost increase.

**SEC-UCT-11**

[B-13-1, p.2] Please confirm that Nextbridge is not seeking approval of the balance in the DADA at this time, and under its proposal the prudence of those amounts will be determined at its first revenue requirement application in which it will seek to add those amounts to its rate base. If not, please explain its proposal.

**SEC-UCT-12**

[B-14-1, p.1] Please confirm that contrary to its application for designation, Nextbridge is not bringing forward a proposal for performance based ratemaking in its leave to construct application, and has decided to simply rely on the Board's filing requirement for electricity transmitters for its first revenue requirement proposal. Please explain why this is appropriate.

**SEC-UCT-13**

[EB-2011-0140, Board Interrogatory 32 to All] Please update Nextbridge's response to Board interrogatory 31-32 to include any additional projects planned or completed since the filing of the response to the interrogatory in EB-2011-0140.

**SEC-UCT-14**

[EB-2011-0140, UCT Designation Application, p.11; B-1-12, Attach] Please explain the increase in forecast OM&A costs at the time of designation from \$4.4M to 7.416M in this application.

**SEC-UCT-15**

[EB-2011-0140 UCT Designation Application, p.92] In Nextbridge's designation application it recognized that there was a possibility that permission may not be granted to construct the line through Pukaskwa National Park and identified a route variant to bypass the area that is similar to the proposed route in this application. Please provide any project cost forecast that Nextbridge had at the time of the designation application regarding the alternative route.

**SEC-UCT-16**

Please provide a table showing, for all capital projects completed by any of the three shareholders of Nextbridge or any of their affiliates within the last 10 years with an original budgeted cost of at least \$400M, the i) name of the project, ii) type of project, iii) utility who undertook the project, iv) budgeted cost, v) actual cost, vi) forecast in-service date at a comparable point in time to the budget for the proposed line project, vii) actual in-service date, viii) variance analysis of cost, ix) variance analysis of schedule, x) lessons learned that are applicable to the proposed line project.

**Hydro One Networks Inc. (“Hydro One”)**

**SEC-Hydro One-1**

[B-7-1, p.4] With respect to the Orangeville TS reconfiguration project, what was the original budgeted cost and what is that amount if it was similarly escalated to be comparable with the proposed station project.

**SEC-Hydro One-2**

Please provide a table showing, for each project Hydro One Networks Inc. (transmission and distribution) has completed within the last 10 years that was budgeted to cost at least \$100M, the i) name of the project, ii) type of project, iii) budgeted cost at a similar point in time as the proposed station project, iv) actual cost, v) explanation of variance (if material), vi) forecast in-service data at a similar point in time as the proposed station project, vii) actual in-service date, viii) explanation of variance (if material).

**SEC-Hydro One-3**

Please provide the full Hydro One business case for the proposed station project.

Respectfully submitted on behalf of the School Energy Coalition this December 21, 2017.

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy Coalition