

APPENDIX C: INTERROGATORIES

OPG Application Determining Transfer of Effective Control  
over the Mississagi Stations

- 1 What is the Effective Date of the Asset Purchase Agreement?
- 2 Please list any facilities owned by OPG on other river systems affected by the operation of the Mississagi stations.
- 3 In section 3(c) on page 9 at line 7, the Application states that “at the time of the transaction there were no common officers and only one common director...between MPT, Brascan or their affiliates and OPG or its affiliates.” What is the status of common officers or directors now and during the interim period?
- 4 In section 3(d) on page 16, the Application lists the contractual agreements entered into between the transacting parties.
  - a) Are these all the agreements between the transacting parties or any of their affiliates regarding the Mississagi Stations?
  - b) If not, please provide a complete list and copies of any other agreements.
- 5 In section 4(b) on page 2 at line 27, the Application states that MPT had full control over the timing, quantity and bidding of the electricity.
  - a) When did MPT become the registered market participant for the Mississagi stations?
  - b) What corporate entity actually transmits the offers for the Stations into the IMO market?
  - c) On what date did OPG cease to be involved in the offering of energy from the stations?
- 6 What other stations are operated from the North West Control Centre?

- 7 Where does operational control of the Mississagi Stations now reside? 14
- 8 In section 4(c) on page 5 at line 4, the Application cites the Competition Bureau's quick issuance of an ARC. Given the submission and testimony of the Competition Bureau at the hearing for RP-2002-0142, does OPG still attribute the same degree of importance as attached to it in the Application? 15
- 9 In section 4(c) on page 6 at line 13, the Application states "Whenever possible, a dedicated communication interface and workstation for the Mississagi Station was utilized." 16
- a) Specify the interfaces and workstation. 17
- b) Describe factors that would make it impossible for resources to be dedicated. 18
- 10 In section 4(c) on page 5 at line 15, the Application states "Access to information about the stations was restricted to only those individuals who required the knowledge to implement the TSA - primarily NWCC operators." 19
- a) Who else had access to the information? 20
- b) Were all these people trained on the business code of conduct? 21
- c) Was a ring-fence contemplated or implemented? If not, why not? 22
- d) Did any other OPG operators have access to the information? 23
- 11 In section 4(c) on page 6 at line 5, the Application states that OPG continued to have an obligation to the IMO to provide eight revenue metering points associated with Aubry Falls GS and Wells GS. 24
- a) Does OPG still have this obligation? 25
- b) Why were these metering points and obligations not taken over by MPT? 26
- c) Would this information allow OPG to know or estimate output of one or more of the Mississagi Stations? 27
- 12 In section 4(d), the application quotes OPG's licence conditions. 28
- a) What is the total in-service capacity for Tier 1? 29

b) What is the total in-service capacity for Tier 2?

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c) Please provide the hourly  $q_h$  values for the Mississagi Stations from January 1, 2000 to December 31, 2004.

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