Hydro One Networks Inc. 7<sup>th</sup> Floor, South Tower 483 Bay Street Toronto, Ontario M5G 2P5 www.HydroOne.com Tel: (416) 345-5393 Fax: (416) 345-6833 Joanne.Richardson@HydroOne.com



Joanne Richardson Director – Major Projects and Partnerships Regulatory Affairs

#### BY COURIER

June 21, 2019

Ms. Kirsten Walli Board Secretary Ontario Energy Board Suite 2700, 2300 Yonge Street P.O. Box 2319 Toronto, ON M4P 1E4

Dear Ms. Walli:

### EB-2019-0120 - Hydro One Networks Inc., Application for Approval of the Allocation of Construction Costs of the Supply to Essex County Transmission Reinforcement Project – Interrogatory Responses

Please find attached Hydro One Networks Inc.'s (Hydro One) responses to interrogatories received in the above-noted proceeding as part of Procedural Order No.1 dated May 24, 2019. The interrogatory responses have been organized by party as indicated below:

Tab 1	OEB Staff
Tab 2	London Property Management Assocation (LPMA)
Tab 3	School Energy Coalition (SEC)
Tab 4	Entegrus Powerlines
Tab 5	Essex Powerlines Corporation (EPLC)

An electronic copy of this has been filed through the Ontario Energy Board's Regulatory Electronic Submission System (RESS).

Sincerely,

ORIGINAL SIGNED BY JOANNE RICHARDSON

Joanne Richardson

Filed: 2019-06-21 EB-2019-0120 Exhibit I Tab 1 Schedule 1 Page 1 of 2

# **OEB STAFF INTERROGATORY #1**

1

1	OED STAFF INTERKOGATORT # 1
2	
3	<u>Reference:</u>
4	2019 HONI Application, February 28, 2019, page 2
5	2013 HONI Application, EB-2013-0421, OPA Supporting Evidence, page 9 <sup>1</sup>
6	
7	Interrogatory:
8	In the current application, Hydro One Networks Inc. (HONI) notes the costs of the
9	Project have been attributed between the triggering customer and the network pool
10	utilizing a proportional benefit approach, and proposes that the Project cost be allocated
11	in proportion to what the triggering customer and ratepayers would have respectively
12	contributed towards the cost of separate solutions to address each need. Staff notes that
13	the methodology therefore uses the proportional costs as a proxy for the proportional
14	benefits.
15	
16	• In the current application, HONI has estimated that <b>72.6%</b> of the benefits will
17	accrue to the triggering load customer (Hydro One Distribution) and 27.4% of the
18	benefits will accrue to all ratepayers.
19	
20	• In HONI's 2013 SECTR application, it was estimated that <b>77.5%</b> of the benefits
21	would accrue to the triggering load customers and 22.5% of the benefits would
22	accrue to all ratepayers.
23	
24	Please explain why HONI believes the benefits to all ratepayers have increased
25	significantly - 27.4% vs. 22.5% - and the benefits to Hydro One Distribution have
26	declined substantially, since the EB-2013-0421 proceeding.
27	
28	For convenience, the OPA (now IESO) supporting evidence from the initial HONI
29	SECTR application, which includes the initial cost estimates (as provided by HONI), can
30	be found at the link set out below:
31	
32	Cost Allocation Evidence – SECTR – IESO

<sup>&</sup>lt;sup>1</sup> Recommended Cost Allocation Treatment for the Supply to Essex County Transmission Reinforcement, Ontario Power Authority, January 2014.

Filed: 2019-06-21 EB-2019-0120 Exhibit I Tab 1 Schedule 1 Page 2 of 2

#### 1 Response:

As Staff correctly notes, HONI is proposing to use the proportional costs as a proxy for the proportional benefits. The relative benefits between Hydro One Distribution and all ratepayers is therefore strictly a function of the relative costs. The costs have been updated since the time of the EB-2013-0421 proceeding to reflect the best information available at this time for purposes of this proceeding.

7

8 HONI agrees that the cost inputs for determining proportional benefits should not 9 normally be updated at this late stage. However, HONI notes that SECTR is an 10 exceptional case where most of the actual costs are already known prior to the Board's 11 review and approval of the cost attribution required under the Transmission System 12 Code.<sup>2</sup> This is not expected to be the normal process.

<sup>&</sup>lt;sup>2</sup> In the OEB's Decision and Order on Phase 1 of the SECTR Leave to Construct proceeding (EB-2013-0421), dated July 16, 2015, the Board determined that "the cost allocation matters in respect of the SECTR Project can be dealt with subsequent to the commencement of the construction of the project." The SECTR project was placed into service in 2018.

Filed: 2019-06-21 EB-2019-0120 Exhibit I Tab 1 Schedule 2 Page 1 of 2

# **OEB STAFF INTERROGATORY #2**

1

1	
2	
3	<u>Reference:</u>
4	2019 HONI Application, page 2
5	2013 HONI Application, EB-2013-0421, OPA Supporting Evidence, page 9
6	HONI response to SEC interrogatory #3, EB-2013-0421, Exh I-P2-6-3
7	
8	Interrogatory:
9	The application notes that, in determining the proportional benefit and the related
10	attribution of costs, the methodology is based on a scenario whereby the network need
11	and triggering customer need are addressed by individual investments to ascertain the
12	proportion each contributes to the aggregate cost of those investments. The table then
13	shows how the relative proportions are applied to the total cost of the integrated solution
14	— "HONI SECTR Project "— that addresses both needs in order to allocate the costs.
15	
16	According to a HONI interrogatory response to SEC (#3) in the initial SECTR
17	proceeding, the costs associated with the avoided network need investments were
18	provided by HONI to the OPA. HONI noted that their cost estimates were "not based on
19	detailed engineering but on past experience with such projects."
20	
21	• In HONI's 2013 application, the <i>estimated</i> cost of the investment that would
22	address the <i>customer</i> need was \$77.4 million. In HONI's current application, the
23	actual cost of \$54.3 million was used for cost allocation purposes.
24	
25	• Investments to address the <i>network</i> need included upgrading the J3E/J4E circuits
26	to 1,600 amps (from Keith TS to Essex 1 TS) and installing 50 MVar of reactive
27	support (in the Windsor-Essex area). In HONI's initial EB-2013-0421 application,
28	the <i>estimated</i> cost associated with those two investments was \$20.5 million. In the
29	current EB-2019-0120 application, HONI has used the same <i>estimated</i> cost –
30	\$20.5 million – for cost allocation purposes.
31	\$20.5 million Tor cost unocution purposes.
32	Given the above, please clarify the following:
33	Siven the usere, please charing the following.
34	1. Why did the estimated cost of the two proxy investments that would have addressed
35	the <i>network</i> need remain exactly the same after about five years, while the investment
35 36	that addresses the customer need declined by about 30%?
30	that addresses the customer need deenned by about 50%:

Filed: 2019-06-21 EB-2019-0120 Exhibit I Tab 1 Schedule 2 Page 2 of 2

- Please provide any documents to support the cost estimate of \$20.5 million and identify the similar projects that were used as benchmarks to reflect past experience.
- 3
- 3. Did HONI re-estimate the costs associated with the two avoided network investments
   and arrive at the same figure of \$20.5 million?
- 6
- 4. If the response to (3) above is no, please provide an updated cost estimate and explain
  how it was determined, including identifying any similar projects that were used that
  are *incremental* to those that were used to arrive at the estimate in the initial case.
- 10

# 11 **Response:**

1. HONI updated the costs based on the best information available for purposes of this 13 proceeding. While most of the actual costs for the investment that addresses the 14 customer need have since become available, no corresponding better information has 15 become available for the investment that would have addressed the network need.

16

HONI would like to take this opportunity to clarify that the \$54.3M cost noted in the
February 28, 2019 letter represented only the actual cost to date. Some additional
costs still remain to be finalized, including amounts that may still need to be incurred
due to a proximity to gas line issue. The final cost for the SECTR project is
forecasted to be \$57.5M.

- 2. Line projects similar to J3E/J4E (12.2 km) include D10S/D9HS (7.1 km) and
   D1A/D3A (4.2 km), which cost \$6.8M and \$5.4M, respectively. Similar projects
   involving dual capacitor banks include Midhurst TS and Orillia TS, which cost
   approx. \$2.6M each.
- 27

22

28 3. The costs were not re-estimated.

- 29
- 4. Based on the benchmark examples in #2 above, the cost estimate is updated to \$18.1M (i.e., \$15.5M + \$2.6M).

Filed: 2019-06-21 EB-2019-0120 Exhibit I Tab 1 Schedule 3 Page 1 of 1

### **OEB STAFF INTERROGATORY #3**

#### 3 **Reference:**

- 4 IESO's April 26th letter
- 5

1 2

#### 6 Interrogatory:

In the IESO's April 26th letter, a concern was raised related to using new actual 7 construction cost information that results in a different cost allocation relative to the 8 original cost allocation that existed at the time of the LTC determination. Section 6.3.18A 9 of the TSC states "Where section 6.3.18 applies, the transmitter shall apply to the Board 10 for approval of the attribution of costs between the triggering customer(s) and the 11 network pool." As such, on a go forward basis, the cost estimates related to addressing 12 both the network need and customer need that exist when the application for leave to 13 construct is approved will be used for cost allocation purposes. Unlike provisions in the 14 TSC related to economic evaluations, neither section 6.3.18 nor 6.3.18A refers to true ups 15 to actuals. Within that context, why does HONI believe it is appropriate to calculate the 16 proportional benefit (i.e., % allocations) based on the actual SECTR cost, rather than the 17 initial cost estimate, in this case? 18

19

### 20 **Response:**

<sup>21</sup> Please see response to Board Staff Interrogatory #1 (Exhibit I-01-01).

Filed: 2019-06-21 EB-2019-0120 Exhibit I Tab 1 Schedule 4 Page 1 of 1

### **OEB STAFF INTERROGATORY #4**

### 3 **<u>Reference:</u>**

4 EB-2013-0421 Procedural Order No. 8 and Accounting Order – Schedule A

#### 6 Interrogatory:

In relation to the EB-2013-0421 proceeding, the Accounting Order was outlined in Schedule A of Procedural Order No. 8. Please confirm that HONI recorded the accounting entries for the SECTR project in accordance with that Accounting Order. If there were any deviations from the approach set out in the Accounting Order, please explain each deviation and provide justification for each.

12

1 2

5

#### 13 **Response:**

HONI confirms that the accounting entries for the SECTR project were recorded in
 accordance with the Accounting Order.

Filed: 2019-06-21 EB-2019-0120 Exhibit I Tab 2 Schedule 1 Page 1 of 1

# LPMA INTERROGATORY # 1

### 3 **<u>Reference:</u>**

Letter from Hydro One Networks Inc. related to EB-2013-0421 – Hydro One Networks
Inc.'s Section 92 – Request for Approval on Attribution of Cost dated February 28, 2019,
the IESO's letter to the Ontario Energy Board dated April 26, 2019 related to IESO
confirmation and the EB-2013-0421 application and Decision and Order dated July 16,
2015.

9

1 2

## 10 Interrogatory:

Please file tables, similar to that found in Tables 1 & 2 of Exhibit B, Tab 4, Schedule 2 that shows a break down of the total cumulative costs of \$74.8 in the same level of detail

- 13 as shown in the above noted tables.
- 14

## 15 **Response:**

<sup>16</sup> The \$74.8M figure (updated to \$75.6M as per the updated costs in Exhibit I-01-02) is not

associated with any particular project for which a breakdown of the costs exists. It is

calculated solely for the exercise of apportioning benefits, by simply adding the cost of

19 the investment to address the customer need (\$57.5M) to the cost of the investment to

address the network need (\$18.1M).

Filed: 2019-06-21 EB-2019-0120 Exhibit I Tab 2 Schedule 2 Page 1 of 1

## **LPMA INTERROGATORY #2**

## 3 **<u>Reference:</u>**

Letter from Hydro One Networks Inc. related to EB-2013-0421 – Hydro One Networks
Inc.'s Section 92 – Request for Approval on Attribution of Cost dated February 28, 2019,
the IESO's letter to the Ontario Energy Board dated April 26, 2019 related to IESO
confirmation and the EB-2013-0421 application and Decision and Order dated July 16,
2015.

9

1 2

## 10 Interrogatory:

- a) How has Hydro One Networks Inc. estimated the \$2 million reduction noted in
   footnote 1 of the February 28, 2019 letter?
- 13

b) Did Hydro One Networks Inc. do any independent verification of the \$2 million cost
 that was provided by the OPA in the OPA Cost Responsibility Evidence provided at
 Exhibit B, Tab 4, Schedule 4 in EB-2013-0421?

17

# 18 **Response:**

- a) The \$2M figure represents the incremental cost between a like-for-like replacement
   of the end-of-life 125 MVA autotransformers at Keith TS and an upgrade to 250
   MVA units.
- 22
- b) The \$2 million cost noted on page 9 in Exhibit B-04-04 in EB-2013-0421 is the same
- <sup>24</sup> \$2 million discussed in (a) above, which was estimated by Hydro One.

Filed: 2019-06-21 EB-2019-0120 Exhibit I Tab 2 Schedule 3 Page 1 of 2

## LPMA INTERROGATORY # 3

## 3 **<u>Reference:</u>**

Letter from Hydro One Networks Inc. related to EB-2013-0421 – Hydro One Networks
Inc.'s Section 92 – Request for Approval on Attribution of Cost dated February 28, 2019,
the IESO's letter to the Ontario Energy Board dated April 26, 2019 related to IESO
confirmation and the EB-2013-0421 application and Decision and Order dated July 16,
2015.

9

1 2

## 10 Interrogatory:

a) Please confirm that the costs shown in the table provided in the February 28, 2019
 letter include actual costs of \$54.3 million for the SECTR Project and an estimated
 cost of \$20.5 million to the network pool that would have been required. If this
 cannot be confirmed, please explain fully.

15

b) Please provide a table similar to that provided in the February 28, 2019 letter that uses
 the costs as provided and approved in EB-2013-0421 to determine the attribution of
 costs between the triggering customer and the network pool.

19

c) Please confirm that the costs requested in part (b) above were all forecasted/estimated
 costs. If this cannot be confirmed, please explain fully.

22

# 23 **Response:**

a) The \$54.3M cost was the actual cost to date as of February 28, 2019. There still
remain some additional costs to be finalized, including amounts that may still need to
be incurred due to a proximity to gas line issue. For additional clarity, the table
provided in (b) below includes the attribution of costs based on a forecasted final cost
of \$57.5M. The \$20.5M cost has been updated to \$18.1M, as per the response to
Board Staff Interrogatory #2 (Exhibit I-01-02 #4).

30

b) As noted in (a), the table below includes the attribution of costs based on an updated
 cost for the avoided network investment of \$18.1M and a forecasted final cost for the
 SECTR project of \$57.5M.

Filed: 2019-06-21 EB-2019-0120 Exhibit I Tab 2 Schedule 3 Page 2 of 2

Line	Solution	Original Filed Cost	Updated Interim Cost	Forecasted Final Cost
1	Upgrading the J3E/J4e 115kV circuits from Keith TS to Essex TS to 1,600 amps and installing 50 MVAr of reactive support in the Windsor – Essex area (includes incremental cost of upgrading end-of-life 125 MVA autotransformers at Keith TS with 250 MVA units)	\$22.5M		
2	Upgrading the J3E/J4e 115kV circuits from Keith TS to Essex TS to 1,600 amps and installing 50 MVAr of reactive support in the Windsor – Essex area (does not include incremental cost of upgrading end-of-life 125 MVA autotransformers at Keith TS with 250 MVA units)		\$20.5M	\$18.1M <sup>1</sup>
3	Addressing the customer need for supply capacity in the Kingsville – Leamington area	\$77.4M	\$54.3M	\$57.5M <sup>2</sup>
4	Total cost of addressing each need separately	\$99.9M	\$74.8M	\$75.6M
5	Actual cost of the HONI SECTR Project	$57.5M^{2}$	\$54.3M	\$57.5M <sup>2</sup>
6	Allocation to Transmission Ratepayers (L1/L4)	22.5%		
7	Allocation to Transmission Ratepayers (L2/L4)		27.4%	23.9%
8	Allocation to Load Customer (L3/L4)	77.5%	72.6%	76.1%
9	Allocation to Transmission Ratepayers (L5xL6)	\$12.9M		
10	Allocation to Transmission Ratepayers (L5xL7)		\$14.9M	\$13.7M
11	Allocation to Load Customer (L5xL8)	\$44.6M	\$39.4M	\$43.8M

1 2

c) Confirmed

<sup>&</sup>lt;sup>1</sup> Updated as per Exhibit I-01-02 #4. <sup>2</sup> Updated as per Exhibit I-01-02 #1.

Filed: 2019-06-21 EB-2019-0120 Exhibit I Tab 3 Schedule 1 Page 1 of 1

# **SEC INTERROGATORY #1**

### 3 **<u>Reference:</u>**

4 N/A

### 5

1 2

### 6 Interrogatory:

- 7 Please explain all differences between what Hydro One originally proposed in EB-2014-
- <sup>8</sup> 0421 regarding allocation of costs, and the proposed in this Application.
- 9

# 10 **Response:**

- 11 The differences in the proposed cost attributions between EB-2013-0421 and this
- proceeding are summarized in the table that appears in the response to LPMA
   Interrogatory #3 (Exhibit I-02-03).

Filed: 2019-06-21 EB-2019-0120 Exhibit I Tab 3 Schedule 2 Page 1 of 2

1		<b>SEC INTERROGATORY # 2</b>				
2						
3	Re	ference:				
4	N/2	A				
5						
6	Int	errogatory:				
7	Hydro One proposed to allocate 72.6% costs to the triggering load customer, Hydro One					
8	Dis	stribution:				
9						
10 11	a)	Does Hydro One Distribution expect to allocate any of those costs to any of its embedded distributors or large users by way of a required a capital contribution?				
12						
13	b)	If the answer to part (a) is yes, please provide details of who will be impacted, the				
14 15		expected amount allocated to them, and the supporting calculations, regarding those amounts. (Note: SEC would expect to see information similar to what was provided				
16		in EB-2014-0421, Exhibit I-P2-2-9 Attachment 1).				
17						
18	c)	If any capital contributions will be required, please provide the specific provisions of the DSC which authorize Hydro One Distribution to require such a capital				
19		contribution.				
20						
21 22	d)	If any capital contributions will be required, does Hydro One envision the Board ever				
22	u)	approving the allocation in a proceeding? Please explain your answer.				
23		approving the unocation in a proceeding. Thease explain your answer.				
25	e)	If any capital contribution will be required, please explain how the allocation differs				
26		from what was proposed in Phase 2 of EB-2014-0421.				
27						
28	Re	sponse:				
29	Iss	ues relating to the cost recovery provisions of the Distribution System Code (DSC) are				
30		yond the scope of this application, which relates only to the attribution of costs				
31	between the transmission customer and the transmission network pool, in accordance					
32	with section 6.3.18A of the Transmission System Code (TSC).					
33						
34	Hy	dro One notes that there is no parallel requirement in the DSC for prior Board review				
35	and	approval where distributors attribute costs to their customers in accordance with the				

<sup>36</sup> cost recovery provisions of the DSC. Hydro One further notes that the capital

Filed: 2019-06-21 EB-2019-0120 Exhibit I Tab 3 Schedule 2 Page 2 of 2

- 1 contribution requirements in the DSC operate in exactly the same manner regardless of
- 2 whether section 6.3.18A of the TSC—which is the subject of this proceeding—applies or
- 3 not.

Filed: 2019-06-21 EB-2019-0120 Exhibit I Tab 4 Schedule 1 Page 1 of 2

### **ENTEGRUS INTERROGATORY #1**

#### 3 **Preface:**

4 Entegrus Powerlines was an intervenor in Hydro One Network's SECTR Leave to 5 Construct Application (EB-2013-0421). In that proceeding, Hydro One Network 6 proposed capital contributions directly to Hydro One Distribution and embedded 7 distributors, including an initially proposed contribution from Entegrus Powerlines of 8 approximately \$1.0M.

# 9

1 2

10 **<u>Reference:</u>** 

Hydro One Network's Inc. letter to the OEB of February 28, 2019, entitled "*EB-2013*-

0421 – Hydro One Networks Inc.'s Section 92 – Request for Approval on Attribution of
 Cost", page 2:

14 15

16

17

18

"The OEB's expeditious approval of these allocations will ease all impacted parties' (e.g., downstream distribution-connected customers) uncertainties regarding financial obligations and enable the completion of contracts and connections among other things related to this Project as documented in HONI's submissions in EB-2016-0003."

19 20

### 21 Interrogatory:

a) Please confirm that the EB-2019-0120 application, as filed, addresses only capital
 contributions sought from Hydro One Distribution and does not address proposed
 contributions to be sought from embedded distributors or their downstream-connected
 customers.

26

(b) If the answer to #1 (a) above is non-affirmative, please provide EB-2019-0120
evidence references describing under what basis (including the applicable code,
version date, page number and article number) the capital contributions will be
sought, as well as the amount of capital contributions sought from Entegrus
Powerlines and any of its customers directly.

32

(c) If the answer to #1 (a) above is non-affirmative, please provide EB-2019-0120
 evidence references which show the load amounts (and sources of such load
 information) for Entegrus Powerlines, Hydro One Distribution and the aggregate of
 other embedded distributors, upon which cost allocations are presumably based.

Filed: 2019-06-21 EB-2019-0120 Exhibit I Tab 4 Schedule 1 Page 2 of 2

Please also advise if future true-up of such load information is anticipated and if so,
 provide a description of the associated true-up process and its timelines.

4 2. (a) If the answer to #1 (a) above is affirmative, please advise if Hydro One
 5 Transmission or Hydro One Distribution intends to propose capital contributions from
 6 embedded distributors by way of another process.

7

3

(b) If the answer to #2(a) above is affirmative, please advise under what basis
(including the applicable code, version date, page number and article number) and
what process such capital contributions will be sought.

11

(c) If the answer to #2(a) above is affirmative, please advise on the amount of capital
 contributions that will be sought from Entegrus Powerlines, as well as any Entegrus
 Powerlines customers directly. If an exact amount is not available, please provide an
 estimate.

16

(d) If the answer to #2(a) above is affirmative, please provide the load amounts (and sources of load such information) for Entegrus Powerlines, Hydro One Distribution and the aggregate of other embedded distributors, upon which cost allocations are presumably based. Please also advise if future true-up of such load information is anticipated and if so, provide a description of the associated true-up process and its timelines.

# 24 **Response:**

Confirmed for (a). For (b) and (c), please see response to SEC Interrogatory #2
 (Exhibit I-03-02).

27

23

28 2. Please see response to SEC Interrogatory #2 (Exhibit I-03-02).

Filed: 2019-06-21 EB-2019-0120 Exhibit I Tab 5 Schedule 1 Page 1 of 1

### **EPLC INTERROGATORY #1**

## 3 **Preface:**

EPLC was an intervenor in Hydro One Network's SECTR Leave to Construct
 Application (EB-2013-0421). In that proceeding, Hydro One Network proposed capital
 contributions directly to Hydro One Distribution as well as embedded distributors.

7

1 2

## 8 **<u>Reference:</u>**

9 Hydro One Network's Inc. letter to the OEB of February 28, 2019, entitled "EB-2013-

0421 – Hydro One Networks Inc.'s Section 92 – Request for Approval on Attribution of
 Cost", page 2:

12 13

14

15

16

"The OEB's expeditious approval of these allocations will ease all impacted parties' (e.g., downstream distribution-connected customers) uncertainties regarding financial obligations and enable the completion of contracts and connections among other things related to this Project as documented in HONI's submissions in EB-2016-0003."

17 18

## 19 Interrogatory:

Please confirm that the EB-2019-0120 application addresses solely capital contributions sought from Hydro One Distribution and does not address capital contributions to be sought from embedded distributors, like EPLC, or any of EPLC's downstream distribution customers.

- 24
- 25 **Response:**

26 Confirmed.

Filed: 2019-06-21 EB-2019-0120 Exhibit I Tab 5 Schedule 2 Page 1 of 1

# **EPLC INTERROGATORY # 2**

	<b>EPLC INTERROGATORY # 2</b>
Pre	face:
EPI	LC was an intervenor in Hydro One Network's SECTR Leave to Construct
App	blication (EB-2013-0421). In that proceeding, Hydro One Network proposed capital
con	tributions directly to Hydro One Distribution as well as embedded distributors.
Ref	erence:
	lro One Network's Inc. letter to the OEB of February 28, 2019, entitled "EB-2013-
•	1 - Hydro One Network's Inc.'s Section 92 – Request for Approval on Attribution of
	t", page 2:
	"The OEB's expeditious approval of these allocations will ease all impacted
	parties' (e.g., downstream distribution-connected customers) uncertainties
	regarding financial obligations and enable the completion of contracts and
	connections among other things related to this Project as documented in HONI's
	submissions in EB-2016-0003."
Inte	errogatory:
	Please confirm whether or not Hydro One Distribution or Hydro One Transmission
	intends to propose capital contributions from embedded distributors, like EPLC, or
	any of EPLC's downstream distribution customers.
ii)	Where the answer to EPLC-2 i) is confirmed, please describe the basis as well as the
	process that Hydro One Distribution or Hydro One Transmission intends to follow.
iii)	Where the answer to EPLC-2 i) is confirmed, please provide the proposed capital
	contribution amounts for EPLC and/or any of its downstream distribution customers.
iv)	Where the answer to EPLC-2 i) is confirmed, please provide any/all load/forecast
	related information by which the allocations were derived.
Res	ponse:

Please see response to SEC Interrogatory #2 (Exhibit I-03-02). 34