

January 10, 2020

Ms. Christine Long Registrar and Board Secretary Ontario Energy Board 2300 Yonge Street P.O. Box 2319 Toronto, ON M4P 1E4

Re: Upper Canada Transmission Inc. (UCT) 2022 to 2031 Transmission Revenue Application

AMPCO Interrogatories Board File No. EB-2020-0150

Dear Ms. Long:

Attached please find AMPCO's interrogatories in the above proceeding.

Best Regards,

Colin Anderson President

Copy to: NextEra Energy Transmission Canada, LLC

EB-2020-0150

Upper Canada Transmission, Inc. (operating as NextBridge Infrastructure LP) Application for approval of electricity transmission revenue requirements for the period from April 1, 2022 to December 31, 2031

AMPCO Interrogatories January 7, 2021

AMPCO-1

Ref: Ex A T2 S1 P3

UCT is applying for recovery of \$5.331 million of pre-July 31, 2017 costs identified in the EB-2017-0182 Decision as being eligible for consideration as construction costs.

Please provide a breakdown and description of the Economic Participation costs of \$3.41 million.

AMPCO-2

Ref: Ex A T2 S1 P3

UTC seeks recovery of \$1.2 million in spares. Please explain what the spares consist of.

AMPCO-3

Ref: Ex A T3 S1 P3

The emergence of health threats associated with COVID-19 caused unforeseeable delays in current construction activities.

- a) Please discuss and quantify the cost, schedule and scope impacts to date.
- b) Going forward, please discuss and quantify the future potential impacts of COVID-19 on current construction cost, schedule and scope forecasts.

AMPCO-4

Ref: Ex A T3 S1 P3

The evidence indicates NextBridge has identified capital projects in accordance with its 10-year capital plan in its TSP following the March 31, 2022 in-service date but is not requesting these capital expenditures be included in a deferral account or added to the revenue requirement during the currently requested IR Term.

Please provide Nextbridge's proposal regarding recovery of these costs beyond the requested IR Term.

AMPCO-5

Ref: Ex A T3 S1 P11

Given the proximity of the East-West Tie line to HONI's existing East-West transmission and station assets, maintenance can be optimized when work can be performed on both lines simultaneously (i.e., vegetation maintenance). These gained efficiencies are passed through to ratepayers as a reduced maintenance expense.

Please quantify the savings in maintenance expenses.

AMPCO-6

Ref: Ex A T3 S1 P12

This plan provides for increased reliability by taking advantage of new technology and equipment to reduce potential outages and gain additional situational awareness of real-time conditions at various critical crossings in the line

Please provide details on the proposed new technology and equipment.

AMPCO-7

Ref: Ex A T3 S1 P13

NextBridge is proposing to utilize a set of measures that best demonstrate its performance and address the performance standards for transmitters as set out in Chapter 4 of the Transmission System Code. The proposed performance measures and their associated RRFE performance outcomes are shown in Table 5.

Please provide targets for these Performance Measures over the IR term.

AMPCO-8

Ref: Ex A T3 S1 P16

The total OM&A expense is \$4.94 million in the Test Year (April 1, 2022 to March 31, 2023). Operations and Maintenance costs total \$1.27 million.

- a) Please provide a breakdown of the Operations and Maintenance activities and explain how the budget was derived.
- b) Please provide any targets for Operations and Maintenance activities over the IR Term.

AMPCO-9

Ref: Ex A T7 S1 P1

Table 1 provides an asset summary.

a) Please provide the quantity of each asset group installed to date.

b) Please provide the cost per km of Overhead Transmission Lines installed.

c) Please provide the cost per Steel Structure installed.

d) Please provide the cost per insulator installed.

AMPCO-10

Ref: Ex B T1 S1 Attachment 1

The East-West Tie Line is scheduled to come into service on March 31, 2022. The IESO Letter dated August 28, 2020 indicates an in-service date of March 31, 2022 does not represent an unacceptable risk to reliability. If the in-service date is delayed beyond March 31, 2022, but before the end of 2022, there may be additional costs to manage the resulting reliability risks; however, these costs are expected to be within the costs of the measures previously identified in the IESO's 2018 Addendum. The IESO maintains that delays beyond the end of 2022 would create an unacceptable amount of increased risk and cost uncertainties as noted in the IESO's 2018 Addendum.

Please discuss current threats to the schedule that could result in a project delay beyond the end of 2022.

AMPCO-11

Ref: Ex B T1 S4 P7

The East-West Tie line conductor is a three-phase transmission line comprised of one 1192.5 kcmil Aluminum Conductor Steel Reinforced "Grackle" conductor per phase, one 19#10 Alumoweld shield wire, and one 48 fibre OPGW. The steel towers will be Guyed-Y and self-supporting lattice towers. The insulators will be composite suspension insulators and glass/porcelain insulators.

Please confirm there is no current documented manufacturing defect related to glass/porcelain insulators.

AMPCO-12

Ref: Ex B T1 S4 P12 Table 4

Please provide forecast costs and quantities for the Test Year for each Maintenance Activity in Table 4.

AMPCO-13

Ref: Ex C T2 S4 Page 1

A total of \$737.1 million in construction costs is forecasted to complete the East-West Tie line, of which 57% have already been incurred as of October 31, 2020.

Please discuss any contingency amounts spent to date.

AMPCO-14

Ref: Ex C T2 S4 Page 2

The evidence indicates the Project Management Office meets on a monthly basis to discuss cost and activity tracking and identify any variances (whether positive or negative) and any unanticipated expenditures that need to be included in the next forecast. Each month this review assesses:

- Cost performance;
- Schedule performance;
- Identification of new risk factors;
- Any major changes to forecast; and
- Vendor performance.
- a) Please provide the start date for the project.
- b) Please provide the latest cost performance information as an overall percentage against the construction budget.
- c) Please provide the latest schedule performance information as an overall percentage against schedule plan.
- d) Please discuss any major changes to the forecast in the last quarter.
- e) Please file the OEB Quarterly Report for Q4 2020.
- f) Please provide the construction cost forecast for the end of 2021.