



May 2, 2024

VIA RESS

Ontario Energy Board
P.O. Box 2319,
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Registrar

Dear Ms. Marconi,

**Re: PUC (Transmission) LP (“PUC”) and Hydro One Sault Ste. Marie (“HOSSM”)
Leave to Construct Transmission Lines and Station Facilities Application
Board File No.: EB-2023-0360**

We are counsel to Essar Power Canada Ltd. (“**EPC**”) in above-noted proceeding. Please find attached the written interrogatories of EPC to PUC, filed pursuant to Procedural Order No. 1.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Vollmer".

DT Vollmer

- c. John Vellone, Borden Ladner Gervais LLP, Counsel for PUC
- Domini Parella, PUC
- Carla Molina, HOSSM
- Monica Caceres, HOSSM
- Madhu Vuppuluri, EPC

Attd.

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sched. B, as amended (the **Act**);

AND IN THE MATTER OF an Application by PUC (Transmission) LP (“**PUC**”) pursuant to s. 92 of the Act for an Order or Orders granting leave to construct new transmission line and station facilities in the city of Sault Ste. Marie.

AND IN THE MATTER OF an Application by PUC (Transmission) LP pursuant to s. 97 of the Act for an Order granting approval of the forms of the agreement offered or to be offered to affected landowners.

AND IN THE MATTER OF an Application by Hydro One Sault Ste. Marie LP pursuant to s. 92 of the Act for an Order or Orders granting leave to construct station facilities and related work at Third Line TS.

AND IN THE MATTER OF an Application by Hydro One Sault Ste. Marie LP pursuant to s. 78 of the Act to create a new regulatory deferral account to capture certain costs related to station work.

AND IN THE MATTER OF an Application by Hydro One Sault Ste. Marie LP pursuant to s. 74 of the Act for an exemption from Section 11.2.1 of the Transmission System Code from the requirement for Algoma Steel Inc. to pay bypass compensation to Hydro One Sault Ste. Marie LP.

EB-2023-0360

INTERROGATORIES

OF

ESSAR POWER CANADA LIMITED

(“EPC”)

May 2, 2024

Question: 1.EPC.1

- Reference:
- Exhibit B Tab 3, Schedule 1, p. 1
 - Exhibit B, Tab 4, Schedule 1, p. 1

Preamble: PUC states the proposed new 230 kV transmission line and new 230 kV transformer station (the “**Project**”) will provide the increased transmission supply capacity and improve system reliability required to meet the increasing short-term and longer-term power demands of the significant load growth forecasted for development within Sault Ste. Marie.

- a) Please provide all working papers, analysis, and reports written or carried out by PUC regarding the forecasted “significant” load growth within Sault Ste. Marie.
- b) Did PUC consider the impact of the Project on forecasted load growth in Northeast and Eastern Ontario in addition to within Sault Ste. Marie? If yes, please discuss how the Project will respond to the forecasted load growth. If no, please explain why not.
- c) Please provide all working papers, analysis, and reports written or carried out supporting PUC’s position that the Project will provide the increased transmission supply capacity required to meet both short-term and longer-term power demands.
- d) Did PUC consider the impacts of the Project on power generators that currently provide capacity within Sault Ste. Marie and Northeastern Ontario? If yes, please discuss PUC’s analysis of the impacts. If no, please explain why not.

Question: **1.EPC.2**

Reference:

- Exhibit B, Tab 2, Schedule 1
- Exhibit B, Tab 3, Schedule 1

Preamble: PUC states that the immediate need for increased transmission capacity is driven by the substantial increase in load at Algoma Steel (“**Algoma**”) due to the addition of EAFs that will replace existing blast furnaces.

In support of the need for the Project, PUC included a letter of support from Algoma for the application and the Project (the “**Letter**”).

- a) Please provide all documents exchanged between PUC, including any PUC-related entities (“**PUC Entities**”), and Algoma in the creation of the Letter.

- b) Did Algoma approach PUC or PUC Entities ahead of publishing the various media releases referenced in the Application? If yes, please provide all documents, including electronic communications and Board minutes etc. related to Algoma’s contact with PUC and/or PUC Entities describing and supporting Algoma’s need for the Project.

- c) Please provide all other working papers, analysis, and reports written or carried out by Algoma provided to PUC or PUC Entities in support of the Project.

Question: **2.EPC.3**

Reference: • Exhibit B, Tab 5, Schedule 1

Preamble: PUC notes that there is no viable alternative to the Project.

PUC further notes that the construction required to upgrade or expand the existing 115 kV facilities cannot be undertaken without significant power outages to all customers served from the Third Line TS and that these outages would be economically unacceptable for these customers.

PUC states that upgrading the existing 115kV transmission line would also be technically unfeasible due to physical constraints of existing rights-of-way and existing clearances to privately owned buildings or existing utilities and infrastructure.

- a) Please provide details of all alternatives to the Project considered by PUC and discuss why each of these alternatives were determined to be unviable.
- b) Did PUC consider any non-wires solutions (**NWS**) in addition to the Project? If yes, please discuss the NWS and why they were not considered part of a viable solution. If no, please explain why not.
- c) Please explain why the outages would be economically unacceptable for affected customers. In your answer, please provide details regarding how PUC made this determination and discuss PUC's analysis of why the outages would be economically unacceptable.
- d) Please provide all working papers, analysis, and reports written or carried out by PUC regarding PUC's determination that upgrading the 115kV transmission line would be more technically unfeasible than other similar projects with similar constraints. In your answer, please provide details of all communications with potentially persons and entities, including any relevant utilities.

Question: 2.EPC.4

- Reference:
- Exhibit B, Tab 5, Schedule 1
 - [Environmental Study Report](#) (The “**Report**”), p. 4

Preamble: The Report indicates that no alternative to generate the additional required electricity from “green sources” in the area needed by Algoma has been identified.

- a) Please provide details of all alternative power sources considered by PUC in the area that could provide the additional required electricity.
- b) How does PUC and/or WSP define “green sources”?
- c) Are there any non-“green” sources that could provide the additional required electricity other than the potential of Algo’s natural gas LSP combined cycle power plant to generate its own additional electricity? If yes, please provide details. If no, please explain why not.

Question: **5.EPC.5**

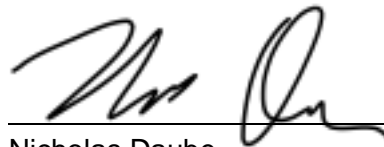
Reference: • Exhibit B, Tab 1, Schedule 1, p. 4

Preamble: PUC states that the Project and HOSSM Station Project are required to provide adequate transmission supply capacity and improve system reliability to accommodate new loads in the city of Sault Ste. Marie and the surrounding area

- a) Please discuss the current state of system reliability and/or quality of electricity services within Sault Ste. Marie.
- b) Please explain how and provide the metrics used to determine that the HOSSM Station Project and the Project will improve system reliability within Sault Ste. Marie.
- c) Will the Project and/or HOSSM Station Project impact reliability and quality of electricity service in Northeast and Eastern Ontario. If yes, please discuss. If no, please explain why not.

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS

2nd day of May, 2024



Nicholas Daube
Resilient LLP
Counsel for EPC