# ***Vulnerable Energy Consumers' Coalition (VECC) INTERROGATORY #17***

## ***Interrogatory***

Reference: Hydro One's Response to Erie Thames Power Lines Corporation. Application, page 3 (lines 7-8)

Preamble: "Networks' assets are not underutilized"

Question:

a) Please provide the basis (i.e. an explanation) for the claim that Networks' assets would not be underutilized if Erie Thames were to supply Phase 1 of the development.

b) Would existing Network assets be under-utilized/stranded if Erie Thames were to supply the later phases of the development? If yes, please explain why.

## ***Response***

a) Networks wishes to preface its response by clarifying the statement which reads "Networks assets are not under-utilized." The statement should read: "Networks' assets are not stranded."

Since Erie Thames owns three-phase lines which lie along Phase 1 of the development, and the customer requires three-phase power, Networks has accepted in its submission that Erie Thames can provide a lower cost of connection for Phase 1 because Networks' assets do not lie along. This would not result in duplication or possible stranding of distribution power system assets.

b) Networks' distribution assets lie along Phases 2 and 3. Networks' existing single-phase assets would be stranded and Networks' existing three-phase assets would be underutilized for Phases 2 and 3 if the Board approves Erie Thames' application. Networks believes it would be able to provide the lowest incremental cost to connect from its assets that lie along Phases 2 and 3 of the development.