

1 **Vulnerable Energy Consumers' Coalition (VECC) INTERROGATORY #3**

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3 **Interrogatory**

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5 Reference: August 7th, 2003 Prefiled Evidence of Hydro One, page 9 (lines 7-11)

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7 Preamble: “Planning for meeting customer demand often requires a minimum
8 installed capacity, even if that capacity exceeds customer needs”

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10 Question:

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12 a) For the situation outlined, wouldn't the incumbent distributor have had to
13 install the same level of capacity even if there was no projected load growth
14 (e.g. addition of new customers). If not, why not?
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16 b) Please explain why, if the current capacity installed by a distributor is the
17 minimum installed capacity to meet current customers' needs, any of the
18 capacity should be considered as underutilized or stranded if new customers in
19 the utility's current service area are subsequently serviced by another
20 distributor.
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22 c) Does Hydro One, as a result of planning for reasonable load growth, install
23 capacity over and above the minimum it could have installed just to meet
24 existing customers current and future requirements? If so, please explain
25 why.
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28 **Response**

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30 a) No. If no new customers are anticipated, Networks' planning would only
31 accommodate the needs of the existing customers.
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33 b) and c) See Networks' Exhibit J8-12-09
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