

1 **HYDRO ONE NETWORKS INC. INTERROGATORIES –**
2 **ENWIN POWERLINES LTD.**

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- 4 1. Please explain how overlapping of distribution service areas will promote
5 economic efficiency in the distribution of electricity.
- 6
- 7 2. Please answer the following questions. Is Enwin Powerlines proposing to:
- 8
- 9 (a) Construct distribution lines in Networks' service area in order to connect
10 customers in the expanded area?
- 11 (b) Connect new customers from Networks' system through Retail Points of
12 Supply?
- 13 (c) Connect new customers' from Networks' system through Wholesale Points of
14 Supply?
- 15 (d) Enter into joint-use agreements with incumbent LDCs and share facilities?
- 16 (e) Connect new customers by any other means? Please provide details.
- 17
- 18 3. Please explain the linkage in Section 7, Item (a) between the "competition in the
19 generation and sale of electricity" and distribution service area expansions.
- 20
- 21 4. What are Enwin Powerlines' SQI statistics, as defined by the Distribution
22 Electricity Rate Handbook, for Emergency response, SAIDI, CAIDI, SAIFI, and
23 new connections during the past 3 years?
- 24
- 25 5. Please provide the following information.
- 26
- 27 (a) The number of customers served in your licensed service areas.
- 28 (b) The kilometres of distribution line installed.
- 29 (c) The number of Municipal Stations operated, locations, and available capacity.
- 30 (d) The kilometres of joint-use line in the current service area.

- 1 (e) The percentage of pole ownership of the joint-use line in the current service
2 area.
- 3 (f) The policy for new connections and expansions.
- 4 (g) The current Conditions of Service Document.
- 5 (h) How customer inquiries are handled (i) during (i) working hours, and (ii) after
6 working hours.
- 7 (i) Identify the billing and payment options available to your customers.
- 8 (j) The number of Wholesale and Retail supply points, the feeder designations
9 and supply voltages, and the available capacity service customers from these
10 supply points.
- 11
- 12 6. What are your outage statistics for the years 2001 and 2002, broken down by
13 planned and unplanned (forced)?
- 14
- 15 7. Please explain how this application assists Enwin Powerlines to avoid revenue
16 disruption as noted on page 10, Item E 4.
- 17
- 18 8. Please explain how this application for an overlapping service area contributes to
19 the greater integration of skilled service workforce and equipment assets available
20 in the immediate vicinity (Page 10 Item E – 2).
- 21
- 22 9. How does this application promote economic efficiency in the distribution of
23 electricity when there are still four distributors in Essex County.
- 24
- 25 10. What are your outage statistics for the years 2001 and 2002, broken down by
26 planned and unplanned (forced)?
- 27
- 28 11. On Page 11, Item (e) 2 Enwin Powerlines maintains that it has load capacity to
29 serve both current and future customers in the proposed expansion area. However,
30 the application goes on to state that appropriate load forecasts and system

1 augmentation considerations will be developed once future land uses are
2 determined. Please explain:

3

4 (a) Does Enwin Powerlines currently have excess capacity to serve the proposed
5 expansion area without the need for additional connection or transformation
6 expenditures? Please provide a copy of the studies that support this statement.

7 (b) Will Enwin Powerlines require additional upstream capacity for distribution
8 or transmission facilities? Please provide a copy of the studies that support
9 this answer.

10 (c) What is the projected load growth in the expansion area? Please provide a
11 copy of the study that supports this answer.

12

13 12. Who will have the obligation to:

14 (a) Provide an offer to connect if Enwin Powerlines is awarded an overlapping
15 service area with Networks?

16 (b) To plan for future capacity in the amendment area if Enwin Powerlines is
17 awarded an overlapping service area with Networks?

18

19 13. In Section 3 Item B of the application it is stated “Enwin currently provides
20 consumers with non-discriminatory access to distribution systems in the
21 community”. Please define what “non-discriminatory access” is in this context.

22

23 14. Please explain how this application for an overlapping service area contributes to
24 the greater integration of skilled service workforce and equipment assets available
25 in the immediate vicinity (Page 10, Item (e) 2) than would be achieved if
26 Networks services this amendment area.

27

28 15. Please explain how these customers, that you state do not have formal load
29 transfer agreements, became connected to Enwin’s lines without Enwin’s and
30 Networks’ agreement.

31

- 1 16. Provide the documentation that permits, or permitted, the connection and billing
2 by Enwin of the Windsor Airport.
3
- 4 17. Please identify any other customers in Networks' service area has Enwin
5 connected, and when was Enwin Powerlines' licence amended to permit these
6 connections.
7
- 8 18. Please provide the locations of all planned developments, as Enwin Powerlines
9 understands it, for the proposed amendment area including the proposed number
10 of residential lots or commercial developments, the timing of the developments,
11 and their contiguity with the existing service area.
12
- 13 20. Please respond to the following questions.
14
- 15 (a) On page 5, Exhibit 1, Scenario A of the Supplemental Evidence suggests that
16 the weighting the Board should use for customer preference is 70%. Please
17 explain how this number was arrived at? Is this weighting applicable only to
18 the customers in the amendment area or also to customers outside the
19 weighting area?
- 20 (b) On Page 5, Exhibit 1, Scenario B of the Supplemental Evidence provides
21 weightings for impacts to the incumbent distributor at 30%. On what basis
22 was this number derived?
- 23 (c) On Page 5, Exhibit 1, Scenario B of the Supplemental Evidence, a number of
24 other considerations and weightings are provided. On what basis were these
25 numbers arrived at?
26
- 27 21. On page 5, Exhibit 1, Scenario B, of the Supplemental Evidence, it suggest that
28 suggest municipal planning considerations should have weight in the Board's
29 decision. What statutory authority do municipal planning departments have for
30 electrical, telephone, gas, fibre optic, and cable TV infrastructure?
31

1 22. On Page 12 of the Supplemental Evidence it states that amendments can occur
2 only when the customers and the distributor will not be burdened by unrecovered
3 asset costs directly employed in serving customers who switch. The submission
4 then goes on to exclude costs related to billing systems, service vehicles,
5 buildings, O and M costs, and does not mention upstream installed capacity costs.

6

7 (a) Please explain what specifically is contemplated as being stranded by the
8 customer switching.

9 (b) Please explain the equation put forward for calculating the value of the
10 stranded assets. Does the equation not provide for a negative value in all cases
11 when the NPV of future residual revenue streams is subtracted from narrowly
12 defined stranded asset value? If not, please provide an example.

13 (c) Please explain how a “narrow definition” of stranded assets will result in
14 distributors aggressively managing overhead costs to be competitive.

15

16 23. Is it the applicant’s view that Networks’ distribution role is limited to being the
17 supplier of customers that want to be served by Networks, and that the applicant
18 and others do not want to serve?

19

20 24. On Page 15, lines 27 and 28 of the Supplemental Evidence its states that
21 whichever licensed distributor receives the request for connection, is the one
22 obligated to serve. Based upon this view how would a distributor plan and make
23 ready capacity for future growth within its licensed service area?

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