

**Ontario Energy
Board**

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**Commission de l'Énergie
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BY FAX AND MAIL

June 12, 2003

Ms. Giovanna Gesuale
Manager, Regulatory Affairs
WNWIN Powerlines Ltd.
4545 Rhodes Drive
P.O. Box 1625
Windsor, ON
N9A 5T7

Dear Ms. Gesuale:

**Re: Combined Distribution Service Area Amendment Proceeding
Board File No. RP-2003-0044, Interrogatories to Applicants**

Procedural Order No. 1 for Proceeding RP-2003-0044, issued March 28, 2003 provided that parties and Board staff who wished additional information from the applicants may request that additional information by written interrogatories filed with the Board and delivered to the applicants by June 12, 2003.

Please find attached Board staff interrogatories.

Applicants are reminded that complete responses to the interrogatories are to be provided no later than July 10, 2003.

Yours truly,

Gord Ryckman
Advisor, Energy Licensing

cc Paul Pudge, Board Secretary.

Interrogatories

Enwin:

1. Please confirm that Hydro One Networks Inc. and Essex Powerlines Corporation are the only other distributors whose service areas may be affected by the proposed amendment to the licence of Enwin Powerlines Limited.
2. Has the Minister of Municipal Affairs and Housing approved the transfer of land from the Town of Tecumseh to the City of Windsor mentioned in the Executive Summary to the evidence?
3. Is Enwin proposing that the service areas of Enwin and Hydro One overlap in the proposed expanded service area?
4. The evidence indicates that Hydro One has existing customers in the proposed expanded service area. Who will serve the Hydro One customers that presently exist in the proposed expanded service area if the proposed amendment is granted?
5. Could existing customers of Hydro One (if any) choose to switch to Enwin? If yes what distribution assets would be used to serve them? If Hydro One's assets, please describe the metering, billing and other arrangements necessary to serve them. If Enwin's assets, please describe how Hydro One would be compensated for a) lost revenue b) stranded assets?
6. If the proposed amendment is granted, would new customers in the expanded service area have a choice of distributor? If yes, and some customers chose Enwin and some customers chose Hydro One, would two distribution systems be built? Please describe the way that choice would be provided to customers. Please discuss this aspect of the proposal with reference to the fourth electricity objective in the OEB Act: promote economic efficiency in the ...distribution of electricity.
7. If the proposed amendment is granted, who would have the obligation to serve customers in the expanded service area? Could a scenario arise where both distributors have the obligation?
8. Would the requested amendment have an impact on Hydro One or its customers? If yes, please describe.
9. Would the requested amendment have an impact on Enwin or its existing customers? If yes, please describe.
10. What are Enwin's Reliability Indices and Service Quality Indicators?

11. What other quantitative evidence is available to compare quality and reliability of service between Enwin and Hydro One? Please provide such evidence.
12. Will additional load transfers or metering points be required as a result of this proposed service area amendment? If yes, identify specific ones if possible.
13. How will the granting of the application contribute to the regional competitiveness and employment growth of the City of Windsor (Ref: Executive Summary)? What evidence is there that these benefits will not occur if the application is denied?
14. At page 10, last sentence of the evidence dated October 31, 2002: "Approval of this application facilitates financial viability because it would avoid disruption to Enwin's revenues." Please explain or expand upon this statement. Would the statement also be true for Hydro One if the application was denied?
15. At page 11, third paragraph of the evidence dated October 31, 2002: "The approval of the application will minimize consumer confusion regarding their electricity supplier as a result of the municipal boundary change due to take effect on January 1, 2003." Please explain or expand upon this statement. If it is proposed by Enwin that the service areas of Enwin and Hydro One overlap, and customers have a choice of two distributors, please explain how this goal is achieved.

Supplemental Evidence - Southwestern Applicants

The following questions have been asked of all three Southwestern Applicants; only one response is necessary.

16. At page 3, lines 28-30 of the Supplemental Evidence of the Southwestern Applicants filed May 29, it indicates that "The applicant distributors would expect that their customers would have non-discriminatory access to the incumbent distributor's system, in exchange for just and reasonable charges approved by the Board for that access". Please explain or expand upon this statement and indicate what charges you consider would be appropriate for this access. Please also describe the metering, billing and other arrangements that might be necessary and how this would be administered.
17. At page 12, lines 3-7 of the Supplemental Evidence of the Southwestern Applicants: "Economic efficiency is promoted when an electric distribution service area corresponds to municipal planning areas, helping to provide an easier and more unified, standardized, timely and cost-effective municipal infrastructure servicing response." If it is proposed by the Southwestern Applicants that the service areas of the Southwestern Applicants and Hydro One overlap, and customers have a choice of two distributors, please explain how such economic efficiencies are achieved.
18. Do overlapping service areas promote economic efficiency in electricity

distribution? If yes, please explain how.