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BY FAX AND MAIL

June 12, 2003

Mr. Jeff Pettit  
President and CEO  
Erie Thames Powerlines Corp.  
143 Bell Street  
P.O. Box 157  
Ingersoll, ON  
N5C 3K5

Dear Mr. Pettit:

**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

### Erie Thames:

1. Please confirm that Hydro One Networks Inc. is the only other distributor whose service area is affected by the proposed amendment to the licence of Erie Thames Powerlines Corporation.
2. Please provide evidence that the subdivision developer has contacted Hydro One and requested information regarding distribution services and connection. The evidence should include a) the date of contact, b) the information requested and c) the response from Hydro One.
3. Section 4 of Erie Thames Application dated October 11, 2002 indicated an estimated capital cost of approximately \$150,000 for the reinforcement and expansion work required to supply the proposed Little Creek Phase 1 subdivision. What is the capital contribution being requested from the customer?
4. Is Erie Thames proposing that the service areas of Erie Thames and Hydro One overlap in the proposed expanded service area?
5. Does Hydro One have any existing customers in the proposed expanded service area? If yes, who will serve these customers if the proposed amendment is granted?
6. Could existing customers of Hydro One (if any) choose to switch to Erie Thames? 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 Erie Thames assets, please describe how Hydro One would be compensated for a) lost revenue b) stranded assets?
7. 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 Erie Thames 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.
8. 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?
9. Would the requested amendment have an impact on Hydro One or its customers? If yes, please describe.

10. Would the requested amendment have an impact on Erie Thames or its existing customers? If yes, please describe.
11. What are Erie Thames' Reliability Indices and Service Quality Indicators?
12. What other quantitative evidence is available to compare quality and reliability of service between Erie Thames and Hydro One? Please provide such evidence.
13. 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.
14. At page 9 of the evidence dated September 26, 2002, number (e) 4: "Approval of the application facilitates financial viability because it would avoid disruption to Erie Thames 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 9 of the evidence dated September 26, 2002, number (e) 5: "Streamlines and localizes planning requirements for site servicing requirements in the area." Please explain or expand upon this statement. If it is proposed by Erie Thames that the service areas of Erie Thames and Hydro One overlap, and customers have a choice of two distributors, please explain how this goal is achieved.
16. At page 3, line 13 of the Supplemental Evidence from the Southwestern Applicants, how do you define "suitable" in regard to Hydro One assets in the proposed expanded service area?

### **Supplemental Evidence - Southwestern Applicants**

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

17. 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.
18. 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.

19. Do overlapping service areas promote economic efficiency in electricity distribution? If yes, please explain how.