**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15 (Sched. B);

**AND IN THE MATTER OF** applications by Centre Wellington Hydro, Veridan Connections Inc., EnWin Powerlines Ltd., Erie Thames Powerlines Corp., Chatham-Kent Hydro Inc., Essex Powerlines Corp., Cooperative Hydro Embrun Inc. and Hydro One Networks Inc. pursuant to subsection 74(1) of the *Ontario Energy Board Act, 1998* to amend Schedule 1 of their Transitional Distribution Licences.

# INTERROGATORIES OF TORONTO HYDRO-ELECTRIC SYSTEM LIMITED ("TORONTO HYDRO") TO ENWIN POWERLINES LTD., ERIE THAMES POWERLINES CORP. AND ESSEX POWER CORPORATION (HEREINAFTER REFERRED TO AS THE "SW APPLICANTS") PURSUANT TO PROCEDURAL ORDER #4

#### **Interrogatory #1:**

- Reference: Supplemental Pre-Filed Evidence of the SW Applicants dated May 29, 2003, Page 3, Lines 10 through 13
- Preamble: The SW Applicants state that a developer has requested service from Erie Thames Powerlines Corporation ("ETPC") in connection with "a specific green-field development site within the Municipality of Central Elgin (the "Green Field Development"). On page 5 of the supplemental pre-filed evidence, a sample evaluation schema is provided in respect of proposed service area amendments. The SW Applicants propose that the Ontario Energy Board ("OEB") adopt the schema.

## **Interrogatory:**

Please indicate how this evaluation schema would be applied against the service area amendment necessary for ETPC to serve the Green Field Development assuming Scenario B, together with the results of the application of the schema to the proposed ETPC service area amendment. Specifically, please include a level of detail when describing the results of the review of the application using the schema which approximates that which would be filed with the OEB as part of any application to the Board.

### **Interrogatory #2:**

- Reference: Supplemental Pre-Filed Evidence of the SW Applicants dated May 29, 2003, Page 12, Lines 22 through 26
- Preamble: The SW Applicants propose a formula for "stranded assets" and contemplates a customer or applicant distributor making a contribution upon switching that would hold the incumbent utility whole.

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### Interrogatory:

Please provide a mathematical calculation and description which illustrates the application of the proposed formula wherein the goal of keeping the incumbent utility whole is achieved. Also, in the illustrative example please explain what safeguards exist to ensure that the switching customer does not pay twice for the privilege of switching distributors (e.g. the customer pays directly or indirectly to the incumbent distributor for any stranded asset contribution and the customer pays a second time for the new distributor's infrastructure).

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