

BEFORE THE ONTARIO ENERGY BOARD

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, Veridian 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.

**Vulnerable Energy Consumers' Coalition ("VECC")
Interrogatories Regarding Evidence Presented Coopérative Hydro Embrun Inc.
(Embrun)**

Question 1

Reference: November 2002 Application, page 2

Preamble: "Local distribution is more efficient in a small community. The office is more accessible to customers."

- a) Please define "local distribution" and explain the basis for the claim that local distribution is more efficient in a small community.
- b) Is it Embrun's position that it can service the currently contested service area (i.e., the area covered by the original application but excluding the 52 lots that were dealt with the OEB's May 15th, 2003 Decision) more cost effectively in terms of the cost of construction, connection and any associated system reinforcement than Hydro One Networks? If yes, please provide any available analyses supporting this position.
- c) Is it Embrun's position that its provision of customer service to the consumers locating in the currently contested area would be more "accessible" than the customer service Hydro One would provide if it serviced these consumers? If yes, please explain the basis for this position.

Question 2

Reference: November 2002 Application, page 2

Preamble: “that amendment is in the best interests of the customers”

- a) Please define which customers Embrun is referring (e.g., Embrun’s existing customers, the potential customers in the contested service area and/or Hydro One’s existing customers).
- b) Please explain why the proposed service area amendment is in the best interests of Hydro One’s existing customers.
- c) Assuming the proposed service area amendment does not benefit (and indeed can be demonstrated to disadvantage existing Hydro One customers) what criteria would Embrun suggest the OEB use to weigh the benefits to certain customers (e.g. Embrun’s customers) against the disbenefits to others in approving this and similar applications?
- d) Please comment on Embrun’s view as to whether the benefiting customers should be required to “compensate” those that are disadvantaged by the service area amendment and, if some form of compensation is reasonable, how that compensation should be determined.