

November 19, 2012

**BY COURIER (2 COPIES) AND EMAIL**

**Ms. Kirsten Walli**

Board Secretary

Ontario Energy Board

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Dear Ms. Walli:

**Re: Questions for Technical Conference from Environmental Defence  
EB-2012-0064 – Toronto Hydro 2012-2015 Rates**

We are writing further to *Procedural Order #3* and Mr. Cass's email of November 14, 2012, requesting prior notice of questions to be posed at the Technical Conference in this matter.

Environmental Defence intends to ask the following questions at the Technical Conference. Each question relates to issue 2.2: Has THESL provided sufficient evidence including consultant reports, business cases and consideration of alternatives, for the proposed capital projects to adequately justify them?

**Question 1: Out-of-Service Time for Windsor Switchgear Busses**

In relation to the upgrades required at the Windsor Transformer Station ("Windsor"), how long would any one switchgear bus be out-of-service while the obsolete equipment is replaced with new equipment?

Note that Pollution Probe's interrogatory #20 asked how long it would take to replace a switchgear bus at Windsor. THELS replied that the whole project would take 3 years. Environmental Defence specifically seeks the duration of time that any one switchgear bus would be out-of-service, not the duration of the project.

By switchgear bus, we refer to the equipment that will be sequentially replaced at Windsor, as discussed in the following passage from the Navigant Business Case Analysis: "Equally important is the compelling need to change out obsolete and heavily loaded switchgear busses at Windsor. One of the primary reasons new station capacity is needed downtown is to provide back-up support while switchgear is sequentially removed and upgraded at Windsor." (Tab 4, Schedule B17, Appendix 3, page 10)

**Question 2: MW Capacity Loss for Windsor Switchgear Bus**

How many MW of capacity would be lost while a switchgear bus is being replaced at Windsor?

Note, Pollution Probe's interrogatory #20 asked how many MW of capacity would be lost while the switchgear bus is being replaced. THESL replied 72 MVA. Environmental Defence specifically seeks the lost capacity in MW not MVA.

**Question 3: Transformer Station Demands in Hourly Intervals**

Please provide an electronic spreadsheet showing the demands (in MW) of each of the five downtown transformer stations in hourly intervals for every hour in 2011.

Note that Pollution Probe's interrogatory #5 sought the demands of the five downtown transformer stations in five-minute intervals. Seeing as five-minute intervals are not available, Environmental Defence asks instead for the data in an electronic spreadsheet in hourly intervals. This data is requested so that Environmental Defence can analyze the loads of the various transformer stations, which is relevant to whether the Bremner Transformer Station is required.

It appears that this data is available and would not reveal customer information. In fact, Hydro One released this same information (i.e. demands in hourly increments) relating to South Central-Guelph in EB-2012-0031 (see response to Pollution Probe Interrogatory #27 in EB-2012-0031).

**Question 4: Demand Reductions from Demand Response Programs**

Please provide a table listing the resulting reductions in demand for each day on which demand was curtailed through the Ontario Power Authority's non-residential demand response programs.

Note that Pollution Probe's interrogatory #18 asked THESL to identify the days on which demand was curtailed through the Ontario Power Authority's non-residential demand response programs, as well as the resulting reductions in demand. Toronto Hydro indicated the days on which demand was curtailed (under DR-3), but not the resulting reductions in demand (i.e. in MW). Environmental Defence specifically seeks the reductions in demand for each of the downtown transformer stations on the relevant days.

Please do not hesitate to contact me if anything further is required.

Yours truly,



Kent Elson

cc: Applicant and Intervenors