

January 9, 2013

BY COURIER (2 COPIES) AND EMAIL

Ms. Kirsten Walli

Board Secretary

Ontario Energy Board

P.O. Box 2319

2300 Yonge Street, Suite 2700

Toronto, Ontario M4P 1E4

Fax: (416) 440-7656

Email: boardsec@oeb.gov.on.ca

Dear Ms. Walli:

**Re: Responses to Interrogatories to Environmental Defence
EB-2012-0064 – Toronto Hydro-Electric System Ltd. (“THESL”)**

I am writing on behalf of Environmental Defence to provide amended interrogatory responses in the above matter.

Earlier today, I filed a set of responses to THESL’s interrogatories to Environmental Defence, dated January 9, 2013. Since filing those responses, we received further information from Enwave Energy Corporation (“Enwave”) relating to interrogatory numbers 2.2 THESL-14 to 2.2 THESL-16. The additional information from Enwave and amended interrogatory responses are enclosed.

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

Yours truly,



Kent Elson

cc: Applicant and Intervenors

**AMENDED RESPONSES TO TORONTO HYDRO-ELECTRIC SYSTEM LTD.
INTERROGATORIES**

Interrogatory No. 2.2 THESL-14

Reference: Environmental Defence Report, Section 3.5

With the addition of 18,125 tons of renewable cooling slated to be operational by 2015, what is the anticipated timeline by which sufficient customers are connected to realize the 18 MW in peak demand savings?

Response:

Enwave advises that: "It is Enwave's intent to have all of Enwave's new customers connected and online by summer 2016." See attached response from Enwave.

Interrogatory No. 2.2 THESL-15

Reference: Environmental Defence Report, Section 3.5

Please provide an estimate of the additional load required to the Enwave DLWC system to enable delivery of the additional 18,125 tons. Is the 18 MW peak demand reduction the net savings?

Response:

Enwave advises that: "It is anticipated that the incremental demand load for Enwave's cooling expansion (18,125 renewable) is 3,625 KW (0.2kw/ton) by 2016." See attached response from Enwave.

Interrogatory No. 2.2 THESL-16

Reference: Environmental Defence Report, Section 3.5

In reference to the possibility of installing back-pressure steam turbine-generators at the Wallton St Steam Plant, is there a potential date when this capacity could be available?

Response:

Enwave advises that: “Additional capacity for a back pressure turbine installation would become available within 2 years of the project’s inception. Additional back pressure turbines may also be installed at Enwave’s other steam plants at Pearl St, Queen’s Park and Ryerson which will realize even greater electricity production.” See attached response from Enwave.

January 9, 2012

INTERROGATORIES TO ENVIRONMENTAL DEFENCE

RE: Enwave responses to outlined questions

2.2 THESL-14

Ref: Environmental Defence Report, Section 3.5

It is Enwave's intent to have all of Enwave's new customers connected and online by summer 2016.

2.2 THESL-15

Ref: Environmental Defence Report, Section 3.5

It is anticipated that the incremental demand load for Enwave's cooling expansion (18,125 renewable) is 3,625 KW (0.2kw/ton) by 2016.

2.2 THESL-16

Ref: Environmental Defence Report, Section 3.5

Additional capacity for a back pressure turbine installation would become available within 2 years of the project's inception. Additional back pressure turbines may also be installed at Enwave's other steam plants at Pearl St, Queen's Park and Ryerson which will realize even greater electricity production.