

1            **Small Waterpower Developers Group (SWDG) INTERROGATORY #1 List 1**

2  
3            **Interrogatory**

4  
5            In response to Board Staff Interrogatory #1, Hydro provided a list of several factors that  
6            would tend to complicate or increase the complexity of the design and the work required  
7            of Hydro One.

- 8  
9            a) Are the safety and reliability impacts on the distribution system variable dependent  
10           upon the type of generation project (hydro, biomass, wind, etc.)?  
11  
12           b) If so, please explain the variations for each type of project (water, wind, solar,  
13           landfill, biomass, etc) and the impact on the Hydro One workload.

14  
15           **Response**

- 16  
17           a) No. The safety and reliability considerations on the distribution system are integral to  
18           the assessments carried out by Hydro One regardless of the type of generation project.  
19  
20           b) Please see the above. There is no incremental workload as such due to the technology  
21           type other than occasional discussions with new technology manufacturers and  
22           vendors on the details of modeling and data provision to Hydro One.

1                    **Small Waterpower Developers Group (SWDG) INTERROGATORY #2 List 1**

2  
3                    **Interrogatory**

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5                    On page 5 of the Application, third paragraph, Hydro One noted, “Similarly, Hydro One  
6                    has been challenged to meet the timeline requirements to provide detailed cost  
7                    estimates...”

- 8  
9                    a) Is it possible to reduce the amount of work by Hydro One devoted to cost estimates  
10                    by providing a less detailed or more generic estimate? Based upon the Hydro One  
11                    experience to date, is it possible to provide a meaningful cost estimate with a level of  
12                    confidence for categories of generation projects (such as a waterpower connection of  
13                    less than 2, 5 or 10MW would be expected to cost less than \$X in Y% of the  
14                    situations)? Provide any statistical analysis that would support the use of such  
15                    estimates.  
16  
17                    b) Could such an approach be used for other types of generation?  
18  
19

20                    **Response**

- 21  
22                    a) Hydro One could provide rough estimates if generators were prepared to take the risk  
23                    of such. In Hydro One’s experience, actual costs can often vary significantly from  
24                    rough estimates and this can cause frustration or even financial hardship for  
25                    generators. Estimates are usually done prior to signing a CCRA and generators need a  
26                    reasonable estimate of costs to sign a binding agreement dealing with the project  
27                    costs. Also, given the nature of Hydro One’s large and rural distribution system and  
28                    the unique attributes of the Generation Connections projects it is very difficult to use  
29                    rule of thumb costs that would be helpful to generators.  
30  
31                    b) The same response as above would apply to all types of generation.

1                    **Small Waterpower Developers Group (SWDG) INTERROGATORY #3 List 1**

2  
3                    **Interrogatory**

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5                    Much of the work to be completed by Hydro One is attributable to the opportunities  
6                    created by the Ontario Power Authority's Renewable Energy Standard Offer Program  
7                    ("RESOP") and the introduction of the Clean Energy Standard Offer Program  
8                    ("CESOP"). On May 13, 2008, the Ontario Power Authority issued a notice regarding  
9                    that deferred the RESOP and CESOP.

- 10  
11                    a) Has the OPA's announcement resulted in a decrease in the rate of applications for  
12                    IFAs and CIAs received by Hydro One?  
13  
14                    b) If so, to what extent?

15  
16                    **Response**

- 17  
18                    a) No, the OPA's announcement on May 13, 2008 resulted in a large increase of  
19                    applications for CIAs.  
20  
21                    b) There were 198 requests for CIAs in May, the highest number in any one month since  
22                    the launch of the RESOP program. There was no increase to the applications for  
23                    CESOP because the OPA has not announced the start of this program yet.  
24

1            **Small Waterpower Developers Group (SWDG) INTERROGATORY #4 List 1**

2  
3            **Interrogatory**

- 4  
5            a) Would the connection workload of IFAs and CIAs be more manageable if the  
6            queuing system were changed?  
7  
8            b) If so, what changes would Hydro One suggest to the queuing process and what would  
9            be the anticipated impact of such changes?

10  
11           **Response**

- 12  
13           a) Changes to the queuing system might contribute to a more manageable workload.  
14  
15           b) The ability to manage IFAs and CIAs is related primarily to the volume of  
16           applications. If the queing system were changed so that CIAs were only required  
17           when projects were closer to the point of connection, this could reduce the volume of  
18           CIA applications. Presently the CIA application is made at the front end of the  
19           process for relatively little cost. Projects that have requested CIAs may or may not  
20           eventually connect to the grid as generators proceed with the development of their  
21           project.

22  
23           In addition, potential changes to the queuing process to ensure projects move forward  
24           to connection could include milestones to ensure projects are progressing once they  
25           enter the queue. The volume of projects requesting assessments might drop if  
26           generators knew in advance the milestones that must be met to ensure connections  
27           they will not be able to hold onto queue positions for projects that would not be  
28           moving forward through these milestones.  
29

1            **Small Waterpower Developers Group (SWDG) INTERROGATORY #5 List 1**

2  
3            **Interrogatory**

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5            In response to Board Staff Interrogatory #11(a), Hydro One stated that it used a “first  
6            come, first served” processing model.

- 7  
8            a)    Could the workload be broken down by region such that certain regions are processed  
9            within the required timeframes?

10  
11           **Response**

12  
13           Hydro One could process applications in some regions ahead of applications in other  
14           regions if directed to do so. The ability to process applications within the timelines would  
15           still depend on the volume of applications in any given region.  
16

1                    **Small Waterpower Developers Group (SWDG) INTERROGATORY #6 List 1**

2  
3                    **Interrogatory**

- 4  
5                    a) Could more information within Hydro One's possession that is required for the CIAs  
6                    be made available to generators or to qualified engineers representing generators so  
7                    that work could be shifted from Hydro One to the generator or the generator's  
8                    engineer? If so, state the type of information that could be made available, to whom it  
9                    could be made available and the form of the information?  
10  
11                    b) If such information can't be made available more broadly, please state the rationale.

12  
13                    **Response**

- 14  
15                    a) The information within Hydro One's possession that is required for the CIA's, if  
16                    made available to generators would not decrease the CIA processing time. Please see  
17                    the response to CanWEA Interrogatory #4(d).  
18  
19                    b) Please see the response to CanWEA Interrogatory #4(d).  
20

**Small Waterpower Developers Group (SWDG) INTERROGATORY #7 List 1**

**Interrogatory**

- a) Please update the responses to Board Staff Interrogatory #1 and #2 with the most currently available information.
- b) If the backlog has further increased or decrease, please state the amount of the change and explain the underlying causes of the change.

**Response**

- a) Update to the response to OEB Interrogatories #1 & 2 on May 16, 2008.
  - (a) Number of new CIA requests.
  - (b) Number of new CIA requests that are eligible for processing.
  - (c) Number of new CIAs completed.
  - (d) Number of rework CIAs completed.
  - (e) Cumulative total number of new CIA requests.
  - (f) Cumulative total number of new CIA requests that are eligible for processing.
  - (g) Cumulative total number of new CIAs completed.

Period Ending	(a) Number of new CIA requests	(b) Number of new CIA requests eligible	(c) Number of new CIAs completed	(d) Number of rework CIAs completed
Nov.	70	45	39	3
Dec.	44	32	23	4
Jan.	37	29	25	5
Feb.	44	30	29	9
March	73	46	16	8
April	69	50	25	10
May	198	77	25	9
June	61	25	25	8
July	53	21	26	5
August	19	10	26	6

- (e) The cumulative total number of new CIA requests since March is 400.
- (f) The cumulative total number of CIA requests eligible for processing is 183.
- (g) The cumulative total number of new CIAs completed is 127.

The backlog has increased to 237 as of the end of August, 2008.

- b) The backlog has increased by 64 applications due to a large increase in the number of applications that were received in May and June following the OPA announcement of May 13, 2008.

1            **Small Waterpower Developers Group (SWDG) INTERROGATORY #8 List 1**

2  
3            **Interrogatory**

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5            Hydro One filed its application on November 30, 2007 and requested an exemption for a  
6            period of 12 months. In addition, in response to Board Staff Interrogatory #10, Hydro  
7            One acknowledged an increase in the backlog of CIAs awaiting completion. It is now 10  
8            months since the filing of the Application and this proceeding has yet to conclude the  
9            evidentiary and interrogatory phase.

- 10  
11           a) Based upon the most recent information, when is Hydro One proposing to end the  
12           exemption period?  
13  
14           b) Has Hydro One prepared any action plan to alleviate the backlog? If so, please  
15           provide such plan.  
16  
17           c) If no action plan has been prepared, why has Hydro One not prepared an action plan?

18  
19           **Response**

- 20  
21           a) Please see the response to OEB Staff Interrogatory #1.  
22  
23           b) Please see the response to CanWEA Interrogatory #4.  
24  
25           c) See the answer to part b).  
26