



Filing Date:	2018-04-25
Case Number:	EB-2017-0049
Interrogatories From:	Hydro One Networks Inc.
Interrogatories To:	Anwaatin
Application Name:	HONI 2018-2022 Dx Rates Application

Interrogatories to Anwaatin

HONI-01

Preamble

At Exhibit A Tab 4 Schedule 2, Pages 3-4, Hydro One discusses a province-wide First Nations engagement session held in early 2017 and hosted by Hydro One's senior executives. Hydro One's evidence is that all of the 85 First Nation Chiefs from communities served by Hydro One and the Ontario First Nations Regional Organizations were invited to attend this engagement session. Reliability and Partnerships were cited as two of the top 5 concerns identified in this session.

During the Technical Conference (2T166-169) questions were asked by counsel for Anwaatin regarding a further First Nations engagement session that was held on February 21, 2018.

Hydro One is interested in Dr. Richardson's understanding of these engagement sessions and how these sessions have informed the views expressed in his evidence.

Interrogatory

1. Please confirm Dr. Richardson was aware that First Nation members of Anwaatin attended the referenced 2017 and 2018 First Nation engagement sessions. If so, please indicate which First Nations attended either on their own behalf or on behalf of Anwaatin.
2. In preparing his evidence, what steps did Dr. Richardson take to understand why specific issues concerning investments in distributed energy resources were not raised at these sessions by First Nations attended either on their own behalf or on behalf of Anwaatin? Is Dr. Richardson aware of any reasons that precluded such matters from being raised? Alternatively, if Dr. Richardson is of the view that such matters were raised, please provide all materials presented and a summary of such discussions.



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HONI-02

Preamble

On September 7, 2017, OEB Staff prepared and filed in this proceeding a Community Engagement Report outlining the results of several engagement sessions undertaken with Hydro One customers affected by the 2018-2022 Hydro One Distribution Rates Application

Hydro One is interested in understanding how this information was taken into account by Dr. Richardson in preparing his evidence.

Interrogatory

1. Which OEB Community Engagement Sessions were attended by Anwaatin Inc representatives? In your response, please refer to the specific presentations described in the Community Engagement Report and where (1) matters relating to distributed energy resources were raised as issues of concern or topics of interest; or (2) the lack of consultation Hydro One had carried out with Anwaatin Inc. or its representatives prior to filing its 2018-2022 Distribution Rates Application.
2. If no presentations were made by Anwaatin Inc. or its representatives at any of these sessions, please provide Dr. Richardson's understanding why concerns regarding the lack of Hydro One's consultation with First Nations and other communities regarding distributed energy resources were not raised at that time?
3. Please provide all correspondence made prior to the filing of this Application between Anwaatin Inc. or its representatives to Hydro One and which evidence Anwaatin Inc. specific interest in the use of distributed energy resources and the need for Hydro One to address such matters in its 2018 Distribution Rates Application.



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HONI-03

Preamble

On March 1, 2018 the Ontario Energy Board convened a Technical Conference into the 2018-2022 Hydro One Distribution Rates Application. In response to follow-up questions from Anwaatin counsel regarding Exhibit I Tab 6 Schedule 1 (Response to Anwaatin Interrogatory #1), Hydro One provided greater detail regarding recent efforts undertaken to explore opportunities to partner with interested First Nations and to leverage federal and provincial government funding to support green energy and greenhouse gas reducing energy projects.

At Transcript Volume 2 pages 152-162) Hydro One's witnesses indicated that initiatives underway with distributed energy resources involving a First Nation situated on Christian Island had only just commenced in 2017 following the filing of this Application. Additionally, that discussions with Anwaatin First Nation members affected by circuit A4L had commenced at the beginning of 2018 (i.e. prior to the interrogatory process in this proceeding) and were ongoing.

Hydro One is interested in Dr. Richardson's awareness of this information when preparing his evidence and how this evidence is intended to (a) influence the conduct of ongoing commercial discussions between Hydro One and Anwaatin regarding distributed energy resources and (b) the timing of Hydro One's current capital plan that includes replacement of the A4L circuit during the rate period.

Interrogatory

1. When did Dr. Richardson become aware of and review the Technical Conference evidence?
2. What consideration was given by Dr. Richardson to the Technical Conference evidence in formulating his conclusions/assertions made regarding inadequate consultation by Hydro One with respect to distributed energy resources?
3. Is it Dr. Richardson's view that Hydro One's proposed replacement of the A4L circuit should be deferred until commercial arrangements regarding a possible joint venture arrangement between Hydro One, Anwaatin Inc., and potentially others is concluded?
4. Acknowledging Dr. Richardson's lack of expertise, does Dr. Richardson believe the Ontario Energy Board should direct Hydro One to rely on a distributed energy resource solution in place of A4L replacement without first evaluating the cost and reliability differences between



1 wire and non-wire solutions? Should activities regarding replacement of the A4L circuit be
2 deferred until such cost and reliability comparisons are completed ad commercial joint
3 ventures, if any, reached?
4

- 5 5. Is it Dr. Richardson's belief that such a point of cost and reliability comparison between
6 replacing the A4L circuit vs relying on a distributed energy resource solution has been
7 reached? If so, please provide all analysis that Dr. Richardson has conducted demonstrating
8 that a distributed energy resource solution provides for greater reliability and lower cost as
9 compared to Hydro One's current plan to replace the A4L circuit.
10

11 **HONI-04**

12

13 **Preamble**

14

15 At paragraphs 14 -16 of Dr. Richardson's evidence, criticism is provided regarding Hydro One's
16 three-pronged strategy to improve system reliability in First Nation Communities. Dr.
17 Richardson's evidence continues to discuss the merits of non-wire solutions as another way in
18 which system reliability can be improved and at potentially lower costs than wire solutions.
19

20 At the Technical Conference, Hydro One's witnesses explained that distributed energy resource
21 solutions were being considered, however such efforts had only begun and were in the
22 preliminary stages and such efforts followed the filing of the Application.
23

24 Dr. Richardson refers to an IESO Report dated December 16, 2016 discussing community
25 energy plans in First Nation communities in the Parry Sound/Muskoka area and cites the
26 conclusions that more research is needed to understand the cost and feasibility of using DERs.
27

28 **Interrogatory**

29

- 30 1. Is it Dr. Richardson's view that none of the three-prongs to the stated strategy can consider
31 non-wires solutions when, for example, capital investment decisions are made (prong 1) or
32 when new technologies emerge (prong 2) or using such solutions when bundling work (prong
33 3)? Please fully explain why such approaches (consideration of non-wire solutions within the
34 three stated prongs of the strategy) are not possible, acknowledging Dr. Richardson is not an
35 expert in such matters.
36



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2. Is it Dr. Richardson's view that as of today's date, sufficient research and understanding now exists regarding the cost and feasibility of using DERs. If so, please provide the information Dr. Richardson is relying on published after the IESO's conclusion dated December 16, 2016 and today.

3. If Dr. Richardson is not challenging the IESO's December 16, 2016 conclusion, does Dr. Richardson take exception to the approach Hydro One is currently following, as explained during the Technical Conference, of proceeding with the use of pilot projects to further the understanding of how DER's may improve system reliability and the costs associated with such potential solutions. If so, please fully explain.

HONI-05

Preamble

Dr. Richardson refers to several documents prepared by the Ontario Independent Electricity System Operator ("IESO") which have considered the topic of distributed energy resources.

At Exhibit B1-1-1 Section 1.2 Hydro One discusses the regional planning process used in the Province and which is co-ordinated by the IESO. At page 4 of 25 of this Exhibit, Hydro One references the fact that emergent needs brought forward by the transmitter, distributors, customers or the IESO that cannot wait until the next scheduled plan is developed is one such "planning trigger". Reference is further made to the steps that the IESO may take (i.e. initiating a Scoping Assessment process) in collaboration with distributors and transmitters in its consideration of non-wires solutions to address the needs in a region or sub-region.

Hydro One is interested in how Dr. Richardson has taken into account the IESO's regional planning process and his views on whether this planning process would best address emerging technologies and approaches such as distributed energy resources as described in his evidence.

Interrogatory

1. When preparing his evidence, what consideration was given by Dr. Richardson to the IESO's regional planning process and specifically, the opportunity for customers to provide input into this planning process for emerging needs and solutions that include non-wire approaches?



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2. Is Dr. Richardson aware of any steps taken by Anwaatin or its representatives to discuss distributed energy resources as potential non-wire solutions with the IESO? If so, please summarize these discussions, provide a chronology of when such discussion took place and discuss any next steps that are planned.

3. Is Dr. Richardson in a position to comment on any concerns or issues that the IESO has identified that require additional study before distributed energy resources are ones that could be adopted in the Anwaatin planning region?

HONI-06

Preamble

On its website (<http://www.ieso.ca/en/get-involved/regional-planning/northwest-ontario/overview>) the IESO reports that the single regional planning area for Northwest Ontario has been divided into four planning sub-regions. The IESO further reports that individual plans are being prepared for each sub-area and will be integrated into an overall Northwest regional plan. Community engagement is stated to be an important part of the regional planning process and sometimes includes the development of a Local Advisory Committee (LAC), which has up to 18 members, representing municipalities First Nation and Metis communities, consumers and citizens, the business community, and environmental conservation groups.

Active engagements in Northwest Ontario are reported to have taken place regarding the sub-region of Greenstone-Marathon and an Integrated Regional Resource Plan was completed in June 2016.

Hydro One is interested in how Dr. Richardson has considered the IESO's regional planning process as a means for Anwaatin or its First Nation members to give consideration to potential reliability improvement solutions involving new technologies that may be associated with distributed energy resources.

Interrogatory

1. Was Dr. Richardson aware of the engagement process associated with the development of the Greenstone-Marathon Integrated Regional Resource Plan at the time his evidence was prepared?



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- 1 2. Please provide Dr. Richardson’s understanding of the IESO’s ongoing engagement sessions
2 that have been held in the Northwest Ontario region subsequent to the release of the
3 Greenstone-Marathon Integrated Regional Resource Plan. In your response, please indicate
4 whether Anwaatin or representatives from its First Nation members attended these
5 engagement sessions and the dates such engagement sessions were held. Please also address
6 whether issues related to distributed energy resources were raised at such meetings.