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August 14, 2018

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

DELIVERED BY EMAIL

Dear Ms. Walli,

RE: Board File No. EB-2017-0182 Nextbridge Leave to Construct Application for the proposed East –West Tie Project

Please find enclosed the supplemental interrogatories of the Consumers Council of Canada in the above noted proceeding.

Yours very truly,



Michael R. Buonaguro
Encl.

**SUPPLEMENTAL INTERROGATORIES OF
THE CONSUMERS COUNCIL OF CANADA**

CCC-1

REF: Exhibit JD1.2 page 21 and Attachment 1; Exhibit JD1.6, page 3.

The Hydro One Inc. Bruce to Milton EA was used as a template for the designation application EA scope of work, which did not include the need for an alternatives assessment. Ministry of Natural Resources and Forestry (MNRF) and Ministry of Environment Conservation and Parks (MECP, formerly Minister of the Environment and Climate Change) indicated in the spring of 2014 that an alternatives assessment would be required as part of the EA during consultation on the TOR for the EA. They indicated NextBridge must include information originally analyzed by NextBridge during their initial review of potential routes during the OEB bid submission. As well, the MNRF indicated that an assessment of alternative routes around provincial parks and conservation reserves was required to allow the Project to cross these lands. The alternatives assessment was then added to the TOR to be completed during the EA.

The allocation for these routes is approximately 11% of the total \$15.8 MM described in this undertaking (see Table 3 of JD.1.2), as it correlates with the approximately 50 km of the total route of 450 km. Accordingly, the calculation of costs for the route change around Pukaskwa Park is \$1.7 MM, which is a subtotal of the actual cost incurred during the extended development period – \$15.8 MM.

- a) Please confirm that the total actual incremental costs attributed to activities 20-24 in Exhibit JD1.2 is \$2.952M. If not confirmed please provide the actual incremental costs for each of activities 20-24 individually.
- b) Please confirm that the implication of the allocation exercise performed by Nextbridge at Exhibit JD1.6 is that of the \$2.952M in actual incremental costs within activities 20-24, approximately 11% of those costs are attributable to the required rerouting of the proposed line relative to the reference route that was assumed in the Designation proceeding, and that approximately 89% of those costs are attributable to increases in the costs associated with portions of the proposed line unaffected by rerouting. If that is not the case, please provide an estimate as to how much of the \$2.952M for activities 20-24 would have been incurred even if no reroute had been necessary, including an explanation as to how the estimate was arrived at.
- c) Please explain why the Bruce to Milton EA did not require an alternatives assessment, whereas the East West Tie line proposed by Nextbridge did require an alternatives assessment. In providing the explanation, please explain how it is that Nextbridge failed to forecast the need for an

alternatives assessment when forecasting the EA process costs in the designation proceeding.

CCC-2

REF: JD1.5

NextBridge did not include First Nation and Métis participation costs in its designation budget. NextBridge conveyed that it was not in a position to estimate the costs associated with First Nation and Métis participation until further engagement had been initiated with communities.

- a) Please provide cites from the designation proceeding wherein Nextbridge conveyed to the Board that it was not in a position to estimate the costs associated with First Nations and Métis participation.
- b) Please provide cites from the designation proceeding wherein Nextbridge conveyed to the Board that its development cost forecast notionally included the costs associated with First Nation and Métis participation, even though those costs were not quantified.
- c) Please compare the First Nation and Métis participation costs included in the development costs budgets for the other proponents in the Designation proceeding that are comparable to the costs actually incurred by Nextbridge.
- d) Please confirm that at least some proponents in the designation proceeding incurred most if not all of their First Nation and Métis participation costs as part of the designation proceeding as opposed to during a development phase.
- e) Please confirm that it is possible to obtain a leave to construct decision for a project prior to incurring material First Nation and Métis participation costs; if Nextbridge does not agree that that is possible, please explain why not.