



Jonathan McGillivray  
Associate  
Bay Adelaide Centre  
333 Bay Street, Suite 625  
Toronto, ON M5H 2R2  
TEL +1.647.208.2677  
FAX +1.888.734.9459  
[jonathan@demarcoallan.com](mailto:jonathan@demarcoallan.com)

February 7, 2019

**Filed on RESS and Sent via Courier**

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Application by Hydro One Networks Inc. for an order or orders approving rates for the transmission of electricity  
Board File No.: EB-2018-0130**

We are counsel to Anwaatin Inc. (**Anwaatin**). Further to Procedural Order No. 1, please find enclosed Anwaatin's interrogatories to Hydro One in the above-referenced matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan McGillivray".

Jonathan McGillivray

cc. Linda Gibbons, Hydro One Networks Inc.  
Charles Keizer and Crawford Smith, Torys LLP  
Larry Sault, Anwaatin Inc.  
Don Richardson, Shared Value Solutions Ltd.

## **ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act*, 1998, S.O. 1998, c.15 (Sched. B), as amended (the **Act**);

**AND IN THE MATTER OF** an application by Hydro One Networks Inc. (**Hydro One**) for an order or orders made pursuant to section 78 of the Act approving rates for the transmission of electricity (the **Application**)

**EB-2018-0130**

**INTERROGATORIES FROM**

**ANWAATIN INC.**

**February 7, 2019**

**Question: Anwaatin.1**

- Reference:
- Exhibit A, Tab 1, Schedule 1
  - EB-2017-0049, Exhibit I, Tab 6, Schedule Anwaatin-1

Preamble: Following discussions with Anwaatin, Hydro One began an initiative in April 2018 to assess whether an energy storage pilot project could be developed in a remote region of the distribution system with sub-standard performance serving Anwaatin communities and tested to determine reliability improvement and whether the approach could be used as a repeatable approach in other regions of the system (the **Pilot Project**).

As of June 2018, Hydro One's technical assessment had focused on three distribution feeder lines that serve the Nakina and Moosonee communities (Nakina F2 and Moosonee F1 and F3). Completion of all engineering and financial viability review was targeted by September 30, 2018. Hydro One has noted that one of the key objectives of the Pilot Project is to assess scalability to meet similar reliability concerns in other communities served by Hydro One (see Exhibit I, Tab 6, Schedule Anwaatin-1, page 5 of EB-2017-0049).

- a) Please provide an update on the status of the Pilot Project and indicate the steps Hydro One has taken to-date to implement the Pilot Project and the steps Hydro One plans to take in the future in order to complete the Pilot Project and determine whether the approach can be used to address sub-standard performance for Anwaatin communities and other outlier communities served by Hydro One.
- b) Please describe the model Hydro One proposes to use to rate-base the Pilot Project and any similar energy storage projects undertaken in the future, including any impact on the process followed by Hydro One to derive its 2019 transmission rates revenue requirement and allocate it among the three transmission rate pools.

**Question: Anwaatin.2**

Reference: • Exhibit A, Tab 3, Schedule 1

Preamble: Hydro One is in the process of evaluating its transmission business plan. To permit this review to occur and to account for inflation as well as to adhere to the Ontario Energy Board’s objective of a combined transmission and distribution application in the future, Hydro One has proposed (1) this Application for a one-year mechanistic adjustment to Hydro One’s 2019 revenue requirement and (2), in 2019, a three-year Custom IR application with a 2020-2022 test period to align Hydro One’s future combined application for distribution rates and transmission revenue requirement for the 2023-2027 period.

In Exhibit I, Tab 10, Schedule 3 of EB-2016-0160, Hydro One’s last transmission rates application, Hydro One provided transmission system performance data for (1) the “Northern” part of the system and (2) the transmission system supplying certain First Nation communities (Beardmore DS #2, Long Lac TS, Moosonee DS, Nipigon DC, Red Rock DS). An update to CDPD outlier data was provided in Exhibit TCJ2.5.

- a) Please provide an update in respect of Hydro One’s transmission system performance data for (1) the “Northern” part of the system and (2) the transmission system supplying certain First Nation communities (Beardmore DS #2, Long Lac TS, Moosonee DS, Nipigon DC, Red Rock DS) by completing the following tables:

(i) Frequency of Momentary Interruptions

Year	2016	2017	2018
# of momentary interruptions			
# of DPs in Northern Region			
T-SAIFI-m*			

\*T-SAIFI-m = Total number of momentary interruptions / total number of DP monitored

(ii) Frequency of Sustained Interruptions

Year	2016	2017	2018
# of sustained interruptions			

<b># of DPs in Northern Region</b>			
<b>T-SAIFI-s*</b>			

\*T-SAIFI-s = Total number of sustained interruptions / total number of DP monitored

(iii) Overall Frequency of Interruptions

<b>Year</b>	2016	2017	2018
<b># of overall interruptions</b>			
<b># of DPs in Northern Region</b>			
<b>T-SAIFI-all*</b>			

\*T-SAIFI-all = Total number of momentary and sustained interruptions / total number of DP monitored

(iv) Duration of Sustained Interruptions

<b>Year</b>	2016	2017	2018
<b>Duration of sustained interruptions (minutes)</b>			
<b># of DPs in Northern Region</b>			
<b>T-SAIDI</b>			

\*T-SAIDI = Total duration of sustained interruptions / total number of DP monitored

(v) Delivery Point Unreliability Index

<b>Year</b>	2016	2017	2018
<b>Total Unsupplied Energy (MW x minutes)</b>			
<b>System Peak Load (MW)</b>			
<b>DPUI</b>			

\*DPUI = Total unsupplied energy / system peak load

(vi) CDDP Outliers

<b>Year</b>	2016	2017	2018
<b>Total # of DPs in Northern Region</b>			
<b># of Outliers in Northern Region</b>			

- b) Please present the data provided pursuant to part (a) in graphical form, together with the data from 2006 through 2015, in a manner similar to the graphical presentation of data in Exhibit TCJ2.5 of EB-2016-0160.

ALL OF WHICH IS RESPECTFULLY  
SUBMITTED THIS

7<sup>th</sup> day of February, 2019



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Jonathan McGillivray  
DeMarco Allan LLP  
Counsel for Anwaatin