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Joanne Richardson

Director – Major Projects and Partnerships
Regulatory Affairs

BY COURIER

July 15, 2019

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Suite 2700, 2300 Yonge Street
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: EB-2019-0007 – Imperial Oil Limited Leave to Construct Pipeline and Associated Infrastructure in the City of Hamilton to the City of Toronto

In accordance with Procedural Order No. 1, please find enclosed Hydro One Networks Inc.'s interrogatories in the above noted proceeding.

An electronic copy of this has been filed through the Ontario Energy Board's Regulatory Electronic Submission System (RESS).

Sincerely,

ORIGINAL SIGNED BY JOANNE RICHARDSON

Joanne Richardson

**EB-2019-0007 – Imperial Oil Limited Leave to Construct
Interrogatories of Hydro One Networks Inc.**

Topic: Transmission Corridor Access

References:

Exhibit A, Tab 1, Schedule 3

The existing pipeline is located within an Imperial right-of-way (“ROW”) for approximately 18.8 km, and within a ROW managed by Hydro One Networks Inc. (“HONI”) for approximately 43.7 km. New easements will be required on a limited number of private lands and Imperial will work directly with the affected landowners to obtain these agreements. New easements will also be required within the HONI ROW, and Imperial is working with HONI and Infrastructure Ontario to secure the necessary agreements.

Exhibit D, Tab 1, Schedule 1, Page 1 of 2

The proposed pipeline route was determined to be the only reasonable option, particularly within the urban landscape, because it benefits from following existing utility corridors.

Exhibit H, Internal Rec 634

Email confirmation from Imperial to IO with the understanding that Imperial should proceed with the Class EA assessment for the scope of undertaking within the HONI corridor.

Exhibit H, Internal Rec 78

TRCA confirmed that no independent archaeology work is required since no geotechnical investigation is being conducted on TRCA-owned lands; all within HONI corridor.

Interrogatory:

- a) There seems to be some inconsistencies in the referencing to the HONI ROW that IOL is seeking to utilize for this Project. For the purposes of clarity, is it IOL’s understanding that the ROW managed by HONI is a utility corridor or an electricity transmission lines corridor?
- b) Please confirm that discussions between IOL, IO and HONI regarding the use of the corridor began in early 2018.
- c) Is there any update on the status of all of IOL’s real estate requirements to complete this Project?
- d) In IOL’s view, why has an agreement not been reached yet with HONI and IO?

Topic: Technical Feasibility*References:*

Exhibit H, Internal Rec 467

Second part of meeting discussed crossings, encroachments and technical requirements within HONI and IO corridor lands.

Exhibit F, Tab 1, Schedule 1, Page 3

Additional new easements will also be required within a corridor managed by HONI/IO on non-fee simple lands for approximately 43.3 km (26.9 mi). Within the HONI/IO managed corridor lands Imperial is proposing a 0.3 m (one foot) wide easement where Imperial currently has an overlapping existing easement and where trenchless construction methods are proposed. A 1.5 m (five foot) wide easement is being proposed on HONI/IO corridor lands where Imperial does not have an overlapping existing easement within the HONI/IO managed corridor lands. In order to minimize impacts to HONI's operations and competing land use in the area, Imperial has reduced the width requirements to the extent possible. Further breakdown of requirements for permanent easement by land ownership is outlined in Table 1.3-1.

Interrogatory:

- a) Please further detail IOL's current proposal for locating the proposed pipeline in the HONI and IO lands. Specifically, please indicate the current separation between the proposed pipeline wall and existing Hydro One tower footings.
- b) Please explain in detail why IOL is deviating from the generally accepted easement width of 10 feet for this Project. Please provide all studies and analyses completed that assisted IOL in establishing that the proposed easements are sufficient not only for construction, but for maintenance access in the future.
- c) Please provide any and all examples in Ontario where a minimum 10 foot easement has not been adhered to for commercial pipelines and the methods of those installations.