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July 17, 2019

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

Dear Ms. Walli:

**Re: Hydro One Networks Inc.
Application for electricity transmission rates for the period from January 1, 2020 to
December 31, 2022
Board File No. EB-2019-0082**

We are counsel to Anwaatin Inc. (**Anwaatin**) in the above-referenced proceeding (the **Proceeding**) and we provide this letter in accordance with Procedural Order No. 1 advising that Anwaatin wishes to reserve the right to file evidence in the Proceeding. Anwaatin will make a final determination as to whether it will file evidence in the Proceeding at a later date.

Anwaatin has intervened in this Proceeding on the instructions of its First Nations and Indigenous members. Anwaatin's members are customers of Hydro One Networks Inc. (**Hydro One**), including Aroland First Nation and Waaskiinaysay Ziibi Inc. Development Corporation (WZI), which is an economic development corporation representing five First Nations in the Lake Nipigon watershed: Rocky Bay First Nation, Bingwi Neyaashi Anishinaabek, Red Rock Indian Band, Whitesand First Nation, and Animbiigoo Zaagiigan Anishinaabek (collectively, the **Anwaatin Communities**).

Anwaatin's Notice of Intervention in this Proceeding sets out the concerns of the Anwaatin Communities and its intention to ensure that First Nations energy customers are better served through access to affordable, reliable, sustainable energy.

In accordance with the requirements of Procedural Order No. 1, this letter addresses: (i) the nature of the potential Anwaatin evidence; (ii) the expertise of the Anwaatin's witness; (iii) the form of the evidence; and (iv) a cost estimate.

Nature of evidence. Anwaatin may adduce direct written evidence provided by consultant Dr. Don Richardson, Ph.D., of Shared Value Solutions Ltd., in order primarily to address the following issues:

- (i) transmission system reliability in Indigenous and northern communities and customer reliability experiences;
- (ii) the impact of Hydro One's transmission reliability performance on Indigenous customers and communities;
- (iii) the status of and progress toward the pilot project Hydro One is developing to implement a Battery Energy Storage System (BESS) to supply Aroland First Nation;
- (iv) the progress toward the Board's direction to Hydro One¹ to explicitly identify initiatives to address the unique reliability challenges experienced in northern communities, including economically justified distributed energy resource solutions; and
- (v) Hydro One's past, current and potential process and measures to consult with Indigenous rightsholders in order to discharge:
 - a. the direct and/or delegated duty to consult and accommodate First Nation communities; and
 - b. its customer obligations in the *Filing Requirements for Electricity Transmission Rate Applications*, dated February 11, 2016 (including section 2.3.2 thereof).

Expertise. Dr. Richardson's curriculum vitae is attached as Appendix "A" to this letter. Dr. Richardson has direct knowledge of the energy conditions of Indigenous communities in northern Ontario and is therefore qualified to provide direct evidence. Dr. Richardson has over 25 years of experience as a skilled facilitator capable of building agreements between energy and resource development project proponents, community/non-governmental organizations, government agencies, and Indigenous communities. Dr. Richardson has provided direct written and oral evidence in prior Board proceedings, including the last Hydro One distribution rates proceeding (EB-2017-0049), the prior Hydro One transmission rates proceeding (EB-2016-0160), and the generic proceeding on natural gas expansion (EB-2016-0004).

Form of evidence. Dr. Richardson would provide his evidence by way of a written report. If the Board provides for oral testimony, Dr. Richardson would be available to participate in the Proceeding for the purposes of direct- and cross-examination.

Cost estimate. Anwaatin roughly estimates that the cost of the preparation of Dr. Richardson's report and participation in the Proceeding will be in the range of \$15,000 to \$25,000, subject to the nature and extent of any interrogatories on Anwaatin's evidence. We have not included in our estimate any related hearing time, should Dr. Richardson be required to testify before the Board.

In addition, the incremental time that will be spent by Anwaatin's legal counsel in relation to the evidence is likely to be in the range of 20 to 25 hours, weighted more toward senior legal counsel with appropriate involvement of junior legal counsel.

¹ EB-2017-0049, Decision and Order, March 7, 2019, p. 18, available online at: <http://www.rds.oeb.ca/HPECMWebDrawer/Record/636422/File/document>.

At this time, Anwaatin appears to be representing a unique and otherwise unrepresented interest in the Proceeding. Anwaatin does not therefore intend to commission its evidence jointly with other parties, but it will canvass interest accordingly.

We trust that this letter satisfies the Board's requirements set out in Procedural Order No. 1 and request that the Board grant the Anwaatin eligibility to recover the costs associated with the participation of Dr. Richardson and the preparation of written evidence. Please do not hesitate to contact us should you have any questions.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized initial 'L' followed by a long, sweeping horizontal stroke that ends in a small arrowhead pointing to the right.

Lisa (Elisabeth) DeMarco

- c. Linda Gibbons, Hydro One Networks Inc.
Charles Keizer and Arlen Sternberg, Torys LLP
Larry Sault, Anwaatin Inc.
Don Richardson, Shared Value Solutions Ltd.

APPENDIX A

Donald R. Richardson, PhD
Managing Partner, Shared Value Solutions Ltd.

Professional History

06/2012 – present, Shared Value Solutions, Managing Partner
09/2004 – 06/2012, AECOM, Global Practice Leader – Socio-economics & Communications, National Leader – Indigenous Business Development
2001 - 2004, Stantec Consulting Ltd., Senior Community Infrastructure and Project Development Specialist
1998 - 2001, TeleCommons Development Group, Director
1994 - 2000, University of Guelph, Associate Graduate Professor (part-time), Faculty of Environmental Design and Rural Development
1987 - 1994, University of Guelph, McMaster University and Wilfred Laurier University, Sessional Lecturer

Education

PhD, Industrial Sociology, McMaster University
MA, Communications and Sociology, University of Guelph
BA, Sociology, University of Guelph
Diploma, Business and Marketing, Lambton College

Awards

Award of Merit – Consulting Engineers of Ontario: Aboriginal Traditional Ecological Knowledge Study
Brownie Award – Canadian Urban Institute: Stelco Swansea Works Remediation & Residential Rebuild

Years of Experience

25



Overview

Don Richardson has over 25 years of experience as a skilled facilitator supporting project implementation, impact assessments and building agreements between energy, infrastructure and resource management project proponents, community/non-governmental organizations, government agencies and rural/Indigenous communities. He fosters constructive engagement to create “shared value”

between communities and infrastructure proponents.

Don currently manages stakeholder and government relations on several large scale environmental and infrastructure development projects. He is a recipient of the Canadian Urban Institute’s Brownie Award recognizing outstanding achievement in building and maintaining effective working partnerships with professionals, the local community and others involved in Brownfields redevelopment, and a Consulting Engineers of Ontario, Canada Award for Indigenous Traditional Knowledge achievements.

Specialties

Collaborative energy and infrastructure project management, environmental assessment, major project impact assessment, cumulative impact assessment, consultation, communication, facilitation, mediation, negotiation, environmental enhancement programs, natural resource management, and participatory communications.

Selected Global and Canadian Experience

Northand Power – Northern Ontario Power Generation Business Coordinator. Assistance in establishing joint-venture partnership among several entities including municipalities and several Anishnabwe First Nations for a proposed gas-fired power generating station in northern Ontario. [2014 – Present]

Anwaatin Inc. – Technical advisor for Indigenous low-carbon energy business development and Indigenous carbon offset projects. [Present]

Walker Industries and Anwaatin. Siting process for establishing a proposed commercial-scale biosolids-to-fertilizer and biomethane-to-pipeline-grid facility on First Nation owned lands in Ontario. [Present]

Multiple Northern Ontario First Nations – Feasibility study for extending natural gas infrastructure to communities adjacent to the TransCanada Mainline natural gas pipeline. [Present]

Matawa First Nations – Ring of Fire Mining Initiatives. Strategic regional and community infrastructure advisor for focused on rail, road, transmission telecommunication and water management infrastructure. [2011 – Present]

Aroland First Nation – Project coordinator for regional transmission line project development initiatives, including regional transmission and transmission line planning for the Ring of Fire mining development and connections to remote first Nations [2013 – Present]

Saugeen Ojibway Nation – Environmental Communications Capacity Building Advisor. Assistance in establishing a communications unit to enhance community engagement and informed community decision-making with respect to the proposed Deep Geological Repository for Low and Intermediate Level Nuclear Waste at the Bruce Nuclear Site. [2014 – Present]

Aroland First Nation. Strategic Advisor. Assistance to develop approaches to major infrastructure, mining, power, rail, road and land use projects that integrate indigenous First Nation values, environmental considerations and cultural heritage contributions. Includes liaison with major mining companies, CN Rail, TransCanada Pipelines, Cliffs Natural Resources, the IESO and several other entities with projects, operations and interests in the traditional territory of the First Nation. Work also includes coordinating First Nation led environmental assessments and risk assessments of contaminated sites to be incorporated within reserve lands. [2011 – Present]

Aroland First Nation. Project Director. IESO-funded Community Energy Plan project to provide the First Nation with a strategic sustainable energy plan [2015-2016]

Mississaugas of the New Credit First Nation. Strategic Advisor. Assistance to develop approaches to major Greater Toronto Area, Canada infrastructure projects that integrate indigenous values, environmental considerations and cultural heritage contributions. Work has included review and impact benefit agreement coordination with the proposed 1,000 kV ITC Lake Erie transmission line from Nanticoke to Pennsylvania, successfully positioning the First Nation as *the* Host First Nation for the 2015 Pan Am Games, and economic development relationship building with OPG and regional pipeline operators [2012 – 2016].

Bamkushwada-Great Lakes Power Transmission. Environmental Assessment Advisor. Working directly with joint venture partners, Brookfield Power, HydroOne Networks and six indigenous rural First Nation business partners involved in the proposed East-West Tie Transmission project along the north of Lake Superior, provided detailed work plan and budgeting support to the joint venture. [2011 – 2014]

Indigenous Aboriginal Community Energy Planning Program Development; Ontario Power Authority. Strategic Advisor. Assistance to develop a new funding program to provide indigenous rural

First Nation and Métis communities across Ontario with resources to undertake Community Energy Planning. [2010 – 2012]

Canadian Environmental Assessment Agency. Co-author. Guidance report on ways and means to improve the integration of indigenous Aboriginal Traditional Knowledge as part of federal Environmental Assessments. [2014]

Brookfield Power – First Nation Business Coordinator. Assistance in establishing joint-venture partnerships among several Anishnabwe First Nations for transmission line projects in northern Ontario. [2014]

Cumulative Effects Management Association (CEMA). Strategic Advisor. Project to identify practical paths forward for the integration of Indigenous traditional knowledge within oil sands mine closure and rehabilitation. (CEMA) is the leading multi-stakeholder group operating in the heart of Canada's Boreal Forest – the Regional Municipality of Wood Buffalo, Alberta. CEMA is comprised of more than 50 members who sit on one of four caucuses: Indigenous, Government, Non-Government Organizations and Industry. CEMA is a key advisor to the provincial and federal governments committed to respectful, inclusive dialogue to make recommendations to manage the cumulative environmental effects of regional development on air, land, water and biodiversity. [2014 – 2015]

Technical Review of Environmental Assessments Detour Lake Gold Mine Project Coral Rapids Power L.L.P, (representing Taykwa Tagamou First Nation). Strategic advisor for reviews of technical aspects and Aboriginal consultation for two provincial EAs and a federal Comprehensive Study EA for the proposed Detour Lake gold mine project. [2010 – 2011]

Ontario Power Generation, Deep Geological Repository for Low/Intermediate Level Nuclear Waste, Public Consultation Program, Canada. Project manager for public consultation and Indigenous community impact assessment components for the environmental assessment for Canada's first deep geological repository for nuclear waste. [2007 – 2013]

Walpole Island First Nation Community, Peer Review - Proposed Shell Canada Refinery Expansion, Sarnia, Ontario. Project manager working closely with First Nation technical staff, community elders, clan mothers and band councillors, facilitated the technical review and socio-economic impact assessment review of a proposed \$10 billion, 200,000 barrel per day heavy oil refinery on the St. Clair River. [2007 - 2008]

Windsor Essex Parkway – Province of Ontario. Strategic advisor for community communications and Indigenous consultation for the Windsor Essex Parkway engineering, design and construction, reporting to Province of Ontario. [2011 – 2013]

Flin Flon & Creighton Education Outreach Campaign for HudBay Minerals - Strategic Advisor overseeing the design and implementation of a community outreach campaign to educate residents of the Flin Flon area about ways to reduce exposure to lead in relation to human health risks. [2010-2013]

Nuclear Waste Management Organization, Community Well-being Support. Stakeholder engagement specialist providing expert guidance to the Nuclear Waste Management Organization on community well-being and stakeholder and indigenous Aboriginal engagement aspects of site selection for a deep geological repository for used nuclear fuel in Canada. [2008 to 2013]

GE Canada, Environmental Programs - Community Relations Programs for Legacy Industrial Sites, Ontario. Implementing four stakeholder relations and communication management programs to manage issues associated with remedial activities for contaminated industrial sites, including First Nation engagement. [2005 - Present]

Walker Industries Southwestern Landfill Environmental Assessment, Oxford County, Ontario.

Public consultation and communication coordinator responsible for planning and implementation of an extensive public consultation program to enable stakeholders and First Nation partners to actively participate in the planning and execution of an Individual environmental assessment for an industrial, commercial and institutional Ontario, Canada landfill. [2012 – Present]

Gabriel Resources and Rosia Montana Gold Corporation, Environmental Assessment, Romania.

Provided planning and strategic support for an extensive public and Indigenous Roma consultation program for the strategic environmental assessment for what may become one of the world's largest gold and silver mining operations. [2002 - 2004]

Global Environment Facility, Meso-American Barrier Reef System - Environmental Monitoring and Information System.

Facilitated a multi-stakeholder program for the design and implementation of a distributed electronic information system for government and local/Indigenous partners from Belize, Guatemala, Honduras, and Mexico who are collaborating in the protection of the ecologically unique and vulnerable marine ecosystems of the western Caribbean. [2003 - 2004]

Environmental Monitoring Information Network (EMIN), Governance Component, Bangladesh.

Provided advice and assistance on mechanisms and processes for achieving multi-stakeholder governance of the Network, including representation from indigenous peoples' organizations. The purpose of EMIN is to implement an information network to facilitate the planning and management of water and land resources as it relates to flood and erosion monitoring among national stakeholders and relevant agencies in the Brahmaputra-Jumuna Rivers region of Bangladesh. [2001 - 2003]

Keewatinook Okimakanak First Nations, Aboriginal Smart Community Project Planning and Evaluation Component, Northwestern Ontario.

Worked with First Nation community leaders in six Keewatinook Okimakanak First Nations communities for this \$10 million Smart Community Project. Activities incorporated participatory exercises that enable local residents to envision the integration of telecommunication systems, applications and related energy infrastructure within their communities, together with assistance in developing and implementing the monitoring and evaluation program for the community initiatives. [1999 - 2004]

Industry Canada, Smart Communities Engagement Best Practices, Nationwide. Project team leader for a cross-Canada fact-finding and analysis of community experiences, particularly among rural and Indigenous communities, to yield five community engagement best practices with concrete examples. [2002 - 2003]

Industry Canada, Smart Communities Performance Measurement and Sustainability, Nationwide.

Researcher and co-author for a cross-Canada fact-finding and analysis of community networking experiences, particularly among rural and indigenous communities, to yield a series of sustainability and performance measurement best practices with concrete examples. [2002 - 2003]

Caribbean Telecommunication Union, International Telecommunication Union, United Nations Educational, Scientific and Cultural Organization, Caribbean Development Bank, Canadian International Development Agency, Multi-stakeholder Collaboration to Enhance Rural and Remote Telecommunications, Caribbean. Planned and facilitated multi-stakeholder workshops for cross-Caribbean stakeholders: government, regulators, telecommunication operators, Indigenous communities, and rural community leaders. [2003]

Social Action Program Communication, Pakistan. Planned and facilitated multi-stakeholder planning for public-private district and provincial infrastructure and service delivery in Punjab, Sindh and Balochistan provinces. Focused on enabling partner organizations and indigenous peoples' organizations to develop a comprehensive results-based management plan and evaluation framework for this project. [1998 - 2002]

Government of Egypt and Food and Agriculture Organization of the United Nations, Rural Development and Agricultural Communication System, Egypt. Worked with Egyptian counterparts to develop and implement a program framework for the establishment and evaluation of a stakeholder driven Internet-based communication network that improves linkages between agricultural extension and research systems and rural community members. The project evolved from a four site pilot project to a fifty site program funded entirely by the government of Egypt and continues to generate significant improvements to the lives of rural community members across the country. [1998 - 2002]

Canadian International Development Agency, Institutional Support to the Development Support Communication Centre, Dikirnis, Nile Delta, Egypt. Responsible for enabling a government facility to transform itself for public-private service provision. Work included developing business planning, marketing and sales processes, facilitating and coordinating joint work plans to strengthen rural community development and agricultural communication, designing monitoring and evaluation frameworks, training program development, gender mainstreaming for agricultural services, introduction of improved electricity, water/irrigation and telecommunication and Internet services for the agricultural extension system, and the establishment of new decentralized, fee-for-service Rural Extension Units to provide more responsive extension services to small farmers across Egypt. The project enabled the Ministry of Agriculture to establish a physical hub in the Nile Delta to support the transition of Egypt's agricultural system from a state-controlled system to a market-based system. [1995 - 2001]

Grameen Bank / Grameen Phone, Bangladesh: Multi-Media Research and Evaluation - Project Director (1999). In partnership with Grameen Telecom, conducted a multi-media evaluation and case study of telephone demand in rural villages of Bangladesh, focusing on the impact of phone use on agricultural marketing, agricultural extension, poverty reduction and analysis of phone usage patterns.

SR Telecom, Ghana: Environmental Assessment and Rapid Market Appraisal /Demand Analysis for rural telephone system in Northern Ghana - Project Team Leader (1998-99). Coordinated a detailed environmental assessment, infrastructure assessment and socio-economic business planning study for a private sector telecom provider for demand-based telecommunication service among rural and agricultural stakeholders in Northern Ghana. The study included power infrastructure inventory and assessment, plus focus groups and survey interviews in 64 villages, together with meetings with village chiefs and key rural and agricultural leaders.

SR Telecom, Multiple Projects, Chile, Haiti, Ghana, and the Philippines. Co-ordinated a corporate strategic program to assist in the implementation and management of telecommunication infrastructure development projects in rural areas. Work included producing detailed socio-economic business plans, coordinating village-based market research programs, producing environmental impact assessments, conducting power infrastructure assessments, and developing strategic approaches to dovetailing telecommunication infrastructure with in-country programs for environment, health, agriculture, Indigenous community wellbeing, and socio-economic development. [1997 - 2000]

International Development Research Centre and International Fund for Agricultural Development, Rural Electronic Networking, Asia-Pacific. Managed multi-stakeholder communication and rural community development needs assessment, planning and development of evaluation frameworks for an eight country Asia-Pacific electronic networking project to enable rural and agricultural development projects to combine Internet connectivity with traditional communication media and outreach activities. Specific support for enabling rural development stakeholders to develop and evaluate practical telecommunications infrastructure and applications in the Philippines, Sri Lanka and Nepal, India. [1998 - 2001]

Community Basic Infrastructure Development, Various Locations. Provided multi-stakeholder communication and rural community development needs assessments, program planning and project

implementation for a variety of clients. Work included projects for clients such as the World Bank, Industry Canada, Rotary International, UK Department for International Development and UN agencies in Bangladesh, Belize, Bolivia, Cameroon, Canada, Colombia, Guatemala, Honduras, India, Italy, Nepal, Pakistan, South Africa, Sri Lanka, Tanzania, Thailand, Uganda, and the United States. [1993 - 2002]

Confidential Client, Waste Management Facility Site Selection, Ontario. Strategic advisor for a comprehensive analysis of stakeholder and political contexts for the siting of two major waste management “campus” facilities in Ontario, Canada. [2008 to 2011]

Environmental Assessment Guide - Métis Nation of Ontario. Co-author and Reviewer. Developed a guide on the environmental assessment processes for use by Métis Nation of Ontario (MNO) staff and Community Council leaders. [2009 – 2010]

Walker Industries Atlas Landfill Remediation Project, Welland, Ontario. Strategic advisor responsible for overseeing engagement of area residents, indigenous Aboriginal communities and government agency technical staff in shaping plans for the remediation and reopening of an abandoned industrial landfill on the banks of the Welland River. [2009 - 2010]

Walker Industries Niagara Falls Landfill Expansion Environmental Assessment, Niagara Region, Ontario. Public consultation and communication coordinator responsible for planning and implementation of an extensive public consultation program to enable stakeholders and Indigenous communities to actively participate in the planning and execution of a comprehensive environmental assessment for one of the largest private sector landfill expansions in Ontario. The project received provincial, regional and municipal approval with no objections from area stakeholders. [2002 – 2009]

Walpole Island First Nation Community, Peer Review - Proposed Shell Canada Refinery Expansion, Sarnia, Ontario. Project manager working closely with First Nation technical staff, indigenous community elders, clan mothers and band councillors, facilitated the technical review and socio-economic impact assessment review of a proposed \$10 billion, 200,000 barrel per day heavy oil refinery on the St. Clair River. [2007 - 2008]

District of Greater Sudbury, Soils Study, Sudbury, Ontario. Planned and implemented a public consultation program for the largest human health and ecological risk assessment in Canada related to historic smelting operations. Work included multi-stakeholder planning to design the engagement of First Nations communities in the scientific fieldwork and results analysis. [2003 - 2009]

Government of Hong Kong, Kowloon Bay Waste Transfer Facility Environmental Assessment, Hong Kong. Project director for strategic planning and community stakeholder relations advice for the environmental assessment of a major waste transfer and waste diversion facility. [2008]

Shell Canada, Sarnia Refinery, Effluent Management Plan Review, Multiple Locations. Project manager for an internal multi-stakeholder review of the oil refinery’s effluent management system and proposals for system upgrades. Work included significant attention to the stated requirements of external stakeholders: indigenous First Nations, communities in Michigan, and regulatory authorities. [2007]

Nuclear Waste Management Organization, Assessment of Benefits, Risks and Costs for Long Term Management Approaches for Used Nuclear Fuel: Community Well-being and Stakeholder Engagement Issues, Canada. Compared several Canadian economic regions with respect to community capacity to engage in complex social, economic and environmental planning processes. Report included recommendations for capacity building for equitable, transparent and meaningful stakeholder engagement, particularly with respect to poorer economic regions and economic regions with significant First Nations populations. [2004 - 2005]