# Elson Advocacy

May 14, 2020

## **BY RESS AND EMAIL**

#### Ms. Christine Long

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

Dear Ms. Long:

# Re: EB-2019-0261 – Hydro Ottawa – 2021-2025 Distribution Rates

Enclosed please find two supplementary interrogatories of Environmental Defence in the above matter. These interrogatories are being filed a few days past the deadline because we learned new information on which these interrogatories are based after the interrogatory deadline. We have moved to provide these promptly (these interrogatories are being filed and served at approximately 8 am on May 14<sup>th</sup>). We hope that Hydro Ottawa will be able to answer these brief interrogatories in the available time. Although we do not anticipate issues, if Hydro Ottawa has any concerns with this, we respectfully request that they contact us directly to discuss a potential resolution.

Yours truly,

Kent Elson

cc: Parties in the above proceeding

## **Supplementary Interrogatories of Environmental Defence**

## EB-2019-0261 – Hydro Ottawa – 2021-2025 Distribution Rates

#### 16. Reference: Exhibit 1, Tab 1, Schedule 9, UPDATED, May 5, 2020, Page 19

- a) Please discuss the possibility of installing solar PV in some of Hydro Ottawa's larger distribution corridors (e.g. as part of the City of Ottawa's efforts to meet its GHG reduction targets). Please include a table itemizing potential obstacles and next steps that would be needed to explore solutions to those obstacles.
- b) What approvals, if any, would Hydro Ottawa require from the OEB to allow a third party to install solar PV in its distribution corridor?
- c) What approvals, if any, would Hydro Ottawa require from the OEB to (i) install solar PV in its distribution corridor as an unregulated investment not funded in rate base, and (ii) install solar PV in its distribution corridor as a cost-effective non-wires solution to a distribution-system need?
- d) For each of Hydro Ottawa's five largest distribution corridors (by land area), please discuss whether and what distribution system upgrades would be required for the installation of solar PV in the corridor. Please make and state assumptions as necessary regarding matters such as the size and type of installation. Please discuss approximate ballpark cost of the kinds of upgrades that might be necessary, if any. Please also discuss who would be responsible for paying for those.
- 17. Reference: Exhibit 1, Tab 1, Schedule 9, UPDATED, May 5, 2020, Page 19
  - a) Please discuss three examples of electrification projects (e.g. heat pumps, EV chargers) hitting the capacity limit of a feeder line and the prospective installer of such equipment being shown an estimate by Hydro Ottawa to expand the feeder line, after which the project was no longer pursued.
  - b) How many times in the past 5 years has Hydro Ottawa indicated to its customer or the prospective installer of an electrification project that the project would require an increase in the capacity of a feeder line for which the customer/proponent would be partially or fully responsible? If an exact number is not known, please provide a best estimate.
  - c) If a new load customer (e.g. home or business) seeks to connect to Hydro Ottawa's system, but that load cannot be accommodated because of the capacity limit of the feeder, what steps does Hydro Ottawa take to resolve (or avoid) this situation? Would the feeder be upgraded? Who would pay for said work?
  - d) If an existing customer seeks to install an electrification project (e.g. large heat pump or electric vehicle charger), but that load cannot be accommodated because of the capacity limit of the feeder, what steps does Hydro Ottawa take to resolve (or avoid) this situation? Would the feeder be upgraded? Who would pay for said work?
  - e) Please compare Hydro Ottawa's responses to (c) and (d) with the practices in place across the river in Gatineau, Quebec.