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January 8, 2021

Ms. Christine E. Long
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Email: registrar@oeb.ca

Dear Ms. Long:

**Re: Hydro One Networks Inc. (Hydro One) Leave to Construct Application –
Power Downtown Toronto City of Toronto Interrogatories**
Ontario Energy Board File Number: EB-2020-0188

In accordance with your letter of direction dated January 5th, 2021, please find attached the City of Toronto interrogatories for the above proceeding. This document has been sent to Hydro One and to all other registered parties to this proceeding.

Yours truly,

A handwritten signature in cursive script, appearing to read "E. Earle".

Edward Earle
Director, Municipal Law Group
City of Toronto Legal Services Division

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c.15 (Sched. B), and in particular, s.92 and s.97 thereof;

AND IN THE MATTER OF an Application by Hydro One Networks Inc. for an Order granting leave to construct five circuit kilometres of 230 kV underground transmission cables in downtown Toronto.

INTERROGATORIES OF THE CITY OF TORONTO ("CITY OF TORONTO")

January 6, 2021

Edward Earle
Director of Municipal Law,
City of Toronto
55 John St., Station 1260,
26th Floor Toronto, ON M5V 3C6
Ward.Earle@toronto.ca

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LINE FACILITIES

Ref: EXHIBIT C, TAB 2, SCHEDULE 1, Attachment 1

Preamble:

Hydro One has filed a letter dated January 7, 2021 to put on record that it intends to descope the mid-shaft (location B on the map provided at Exhibit B, Tab 2, Schedule 1, Attachment 1) at Sherbourne St. and Shuter St. ("the mid-shaft") from the works being requested as part of this Application.

Question: Question: Will Hydro One update the prefiled evidence to remove references to the mid-shaft and resubmit prior to receiving Leave to Construct?

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Ref: Exhibit B, Tab 7, Schedule 1, page 2

Preamble:

Risks and Contingencies

Three project risks are outlined as major contributors to the total contingency suggested for this project. The first named risk are Approvals – "there are many risks with permits and approvals from third party stakeholders. There are other utilities crossings, transportation crossings, and environmental permits with the City of Toronto and MECP".

Question: What approvals does Hydro One anticipate it will require from the City of Toronto that present a risk of delay or cost?

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EXHIBIT E, TAB 1, SCHEDULE 1, Page 2 of 4, lines 14 to 19

Preamble

Hydro One Request for Temporary Rights to City Property Located at 75 Elizabeth Street

The exit shaft located at Terauley TS requires temporary rights for a storage/staging area adjacent to this location for the forecast term of Q1 2022 to Q2 2025. Hydro One has stated that it is seeking a short-term licence with the impacted landowner, City of Toronto.

Staff with the City of Toronto and the City's real estate agency CreateTO have been engaged in discussions with Hydro One with respect to the Project and the proposal to use the City property at 75 Elizabeth Street (the "City Property") for storage/staging

purposes. In 2019 the City publicly identified the City Property for redevelopment and use for public purposes according to a timeline which will conflict with the timeline for Hydro One's proposed use of the City Property as currently proposed. Further discussion will be required to see if it is possible to accommodate the proposed use on agreement terms satisfactory to the City.

In October, 2019 City Council identified the City Property as a future development property under the City's ModernTO program, which is a City-wide real estate strategy to optimize its real estate portfolio planning. The City Property was specifically identified at that time as an important asset that will be repurposed to address City priorities, such as affordable housing, employment uses and community infrastructure. The City's contemplated redevelopment is also anticipated to occur commencing in late 2023. As a result, City and CreateTO staff currently have no City Council direction to permit the City Property to be used in the manner Hydro One has suggested given the clear impacts on the City's own plans for the use of the property as directed by City Council. Staff would have to obtain further direction in order to depart from the current plan to utilize the City Property to address City priorities.

Questions:

- (a) Has Hydro One considered or identified other locations for storage/staging purposes?
- (b) Can Hydro One arrange construction scheduling or staging such that its requirement for a storage/staging area will for a shorter term that permits the City to proceed with redevelopment of the City Property commencing in late 2023?