

Ms. Christine Long
OEB Registrar
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

October 15, 2021

**Re: EB-2021-0107 – Hydro One Kirkland Lake Leave to Construct
Pollution Probe Interrogatories**

Dear Ms. Long:

In accordance with Procedural Order No. 1 for the above-noted proceeding, please find attached Pollution Probe's interrogatories to the applicant.

Respectfully submitted on behalf of Pollution Probe.



Michael Brophy, P.Eng., M.Eng., MBA
Michael Brophy Consulting Inc.
Consultant to Pollution Probe
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cc: Eryn MacKinnon, Hydro One Networks Inc. (via email to regulatory@HydroOne.com)
Michael Engelberg, Hydro One Networks Inc. Counsel (via email)
All Parties (via email)
Richard Carlson, Pollution Probe (via email)

ONTARIO ENERGY BOARD

**Hydro One Network Inc. Kirkland Lake
Leave to Construct**

POLLUTION PROBE INTERROGATORIES

October 15, 2021

**Submitted by: Michael Brophy
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Toronto, Ontario M4G 3H4

Consultant for Pollution Probe**

Pollution Probe #1

[Ex. B, T3, Sch.1]

- a) Current distributed energy resource (DER) capacity in Ontario is currently approximately 5.1 MW based on IESO information. What incremental DER capacity will this project enable if approved and constructed? Please provide details.
- b) Please explain how this project will support increased DER capacity in Ontario.
- c) Incremental capacity can compete with more cost-effective local DER options. Please explain how this project would minimize increasing barriers to local DER solutions, including but not limited to CDM, storage and renewable generation.
- d) Please explain what supply and demand assumptions have been made in regards to increased electrification in Ontario over the life of the proposed assets.

Pollution Probe #2

[Ex. B, T3, Sch.1]

Please explain why an upgrade is more beneficial than maintenance or a like-for-like replacement.

Pollution Probe #3

[Ex. B, T5, Sch.1]

- a) Please describe what DER or non-wires alternatives were assessed as options and how they compared in the cost benefit assessment.

Pollution Probe #4

[Ex. B, T7, Sch.1]

What are the environmental and socio-economic mitigation costs included in the project cost estimate and how were they developed?

Pollution Probe #5

[Ex. B, T7, Sch.1]

- a) Was an Environmental Assessment conducted for the proposed project? If yes, please provide a copy. If not, please indicate why not or when one will be completed.
- b) Have environmental and socio-economic mitigation plans been developed for the proposed route? If yes, please provide a copy. If not, please indicate why not or when they will be completed.

Pollution Probe #6

[Ex. B, T7, Sch.1]

Reference: Approvals and Permits – “there is a risk of delays being encountered in obtaining required approvals including Environmental Assessment and Leave to Construct.”

- a) Please explain in more detail the risks related to the Environmental Assessment and what Hydro One is doing to mitigate that risk.
- b) Please explain how Leave to Construct approval can be granted if the completion of the Environmental Assessment process is not successful?

Pollution Probe #7

[Ex. B, T7, Sch.1]

- a) Have the existing assets being replace by this project been fully depreciated? If not, please indicate the current amount not depreciated.
- b) Is the estimated cost of the project net of salvage value against the existing assets being retired?
- c) What is the estimate salvage value of the proposed assets to be retired and who receives these benefits?

Pollution Probe #8

[Ex. B, T7, Sch.1]

- a) Is construction of this project contingent on capital approval in EB-2021-0110? If not, where will the capital expenditure approved by the OEB.