



October 26, 2021

**VIA RES**

Ontario Energy Board  
P.O. Box 2319,  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4  
Attention: Registrar

Dear Ms. Long,

**Re: Hydro One Networks Inc. (HONI)**  
**Application for electricity transmission and distribution rates and other charges**  
**for the period from January 1, 2023 to December 31, 2027**  
**Board File No.: EB-2021-0110**

We are counsel to Anwaatin Inc. (**Anwaatin**) in the above-noted proceeding. Please find attached the interrogatories of Anwaatin, filed pursuant to Procedural Order No. 1.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan McGillivray".

Jonathan McGillivray

c. Eryn MacKinnon, HONI  
Charles Keizer and Arlen Sternberg, Torys LLP  
Larry Sault, Anwaatin  
Don Richardson

Encl.

## **ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*,  
S.O. 1998, c. 15, Sched. B, as amended (the “**Act**”);

**AND IN THE MATTER OF** an Application by Hydro One  
Networks Inc. (“**HONI**”) for an order or orders made  
pursuant to section 78 of the Act, approving or fixing just  
and reasonable rates for the transmission and distribution  
of electricity.

**EB-2021-0110**

### **INTERROGATORIES**

**OF**

**ANWAATIN INC.  
(ANWAATIN)**

**October 26, 2021**

**Question: A–Anwaatin–1**

Reference: 

- Exhibit A, Tab 7, Schedule 2,
- Exhibit A, Tab 7, Schedule 2, Attachment 1

- a) Please place HONI's current Indigenous Relations Policy ("**IRP**") on the record in this proceed. Please outline the changes to the IRP HONI anticipates over the 2023-2027 period.
- b) Please confirm that Appendix 1 to Exhibit B, Tab 1, Schedule 1, Section 1.6 is the draft investment plan shared with customers during the Phase 2 Customer Engagement Process discussed at Exhibit A, Tab 7, Schedule 2, Section 4.2 (p. 4) (the "**DIP**"). If it is not the DIP shared with customers during customer engagement, please place the DIP on the record in this proceeding.
- c) Please file all reports, presentations, analysis, data, or other materials (including drafts) related to the First Nations Electricity Reliability Improvement Plan.
- d) Please file all reports, presentations, analysis, data, or other materials (including drafts) produced or used in coming to the decision to develop and implement a First Nations Electricity Reliability Improvement Plan.
- e) Please provide a detailed process and timeline for the development and implementation of the First Nations Electricity Reliability Improvement Plan.
- f) Please provide an outline of the anticipated contents of the First Nations Electricity Reliability Improvement Plan and precisely delineate the reliability improvements that HONI expects will be undertaken through its distribution business and those that will be undertaken through its transmission business.
- g) What is the anticipated process and timeline to carry out the detailed studies of energy storage candidate communities as described at Exhibit A, Tab 7, Schedule 2, Attachment 1 (p. 10)?
- h) Please revise and refile the chart in Appendix A to Exhibit A, Tab 7, Schedule 2, Attachment 1 to include the feeder(s) and/or line(s) associated with each of the First Nations communities listed.

**Question: B1–Anwaatin–2**

Reference: 

- Exhibit B, Tab 1, Schedule 1, Section 1.6
- Exhibit B, Tab 1, Schedule 1, Section 1.6, Attachments 2 and 3

- a) Please file any and all reports, presentations, analysis, data, or other materials related to HONI's engagement with Indigenous communities. Please also file any and all reports to the board of directors related to same.
- b) In light of the Board's prior directive to HONI "to explicitly identify initiatives to address reliability challenges in northern and First Nation communities, including economically justified Distributed Energy Resource ("DER") solutions" (EB-2017-0049), please specifically describe precisely how HONI consulted Indigenous communities on increasing HONI capital investments in DERs to improve system reliability in Indigenous communities what resulted from those specific consultation efforts.
- c) Please file each of the versions of the draft investment plans used in Phase 1 and Phase 2 of the customer engagement process.
- d) Please list any and all Indigenous communities that are concerned about historical, present and future compensation (or the lack thereof), for HONI transmission or distribution assets on reserve lands and/or within traditional territories and treaty lands.
- e) Please describe in general terms whether and how HONI compensates Indigenous communities for HONI assets on reserve lands and/or within traditional territories and treaty lands.
- f) What opportunities does HONI make available to Indigenous communities to participate as equity owners in DER reliability assets?

**Question: B2–Anwaatin–3**

**Reference:** • Exhibit B, Tab 2, Schedule 1, Section 2.4

**Preamble:** HONI has previously provided transmission system performance data for (1) the “Northern” part of the system and (2) the system supplying certain First Nation communities (Beardmore DS #2, Long Lac TS, Moosonee DS, Nipigon DC, Red Rock DS).

- a) Please provide an update in respect of HONI’s transmission system performance data for (1) the “Northern” part of the system and (2) the transmission system supplying certain First Nation communities (Beardmore DS #2, Long Lac TS, Moosonee DS, Nipigon DC, Red Rock DS) by completing the following tables:

(i) Frequency of Momentary Interruptions

Year	2019	2020
# of momentary interruptions		
# of DPs in Northern Region		
T-SAIFI-m*		

\*T-SAIFI-m = Total number of momentary interruptions / total number of DP monitored

(ii) Frequency of Sustained Interruptions

Year	2019	2020
# of sustained interruptions		
# of DPs in Northern Region		
T-SAIFI-s*		

\*T-SAIFI-s = Total number of sustained interruptions / total number of DP monitored

(iii) Overall Frequency of Interruptions

Year	2019	2020
# of overall interruptions		
# of DPs in Northern Region		
<b>T-SAIFI-all*</b>		

\*T-SAIFI-all = Total number of momentary and sustained interruptions / total number of DP monitored

(iv) Duration of Sustained Interruptions

Year	2019	2020
Duration of sustained interruptions (minutes)		
# of DPs in Northern Region		
<b>T-SAIDI</b>		

\*T-SAIDI = Total duration of sustained interruptions / total number of DP monitored

(v) Delivery Point Unreliability Index

Year	2019	2020
Total Unsupplied Energy (MW x minutes)		
System Peak Load (MW)		
<b>DPUI</b>		

\*DPUI = Total unsupplied energy / system peak load

(vi) CDPD Outliers

Year	2019	2020
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<b>Total # of DPs in Northern Region</b>		
<b># of Outliers in Northern Region</b>		

- b) Please present the data provided pursuant to part (a) in graphical form, together with the data from 2006 through 2018, in a manner similar to the graphical presentation of data in Exhibit JT 1.27 in EB-2019-0082. Please include graphical representation of the average from 2006 to 2020.

**Question:**      **B3–Anwaatin–4**

**Reference:**      • ISD D-SS-04, p. 5-6

**Preamble:**      Following discussions with Anwaatin, HONI began an initiative in April 2018 to assess whether an energy storage pilot project could be developed in a remote region of the distribution system with sub-standard performance serving Anwaatin communities and tested to determine reliability improvement and whether the approach could be used as a repeatable approach in other regions of the system (the “**Pilot Project**”). The Pilot Project includes two phases.

Anwaatin and HONI filed a Settlement Proposal with the Board on June 15, 2018 in EB-2017-0335 (the “**Settlement Proposal**”) and the Board accepted the Settlement Proposal in its [Decision and Order dated August 23, 2018](#).

HONI makes reference to the Aroland First Nation BESS pilot project at page 5 of ISD D-SS-04, but does not discuss other aspects of the Pilot Project (including Phase 2).

- a) Please confirm the current status of the Aroland First Nation BESS pilot project.
- b) What is the current status of work contemplated in Phase 2 of the Pilot Project? Please describe how lessons learned in implementation of the Aroland First Nation BESS pilot project will be used for similar solutions in other Indigenous communities with sub-standard reliability.
- c) Please discuss all aspects of the Settlement Proposal that Hydro One is currently undertaking or intends to undertake during the 2023-2027 period.
- d) The Settlement Proposal contemplates the use of solar generation facilities in conjunction with battery energy storage systems. Please describe Hydro One’s consideration of solar generation facilities in relation to the Pilot Project and the Settlement Proposal broadly and provide all related reports and analysis.
- e) Is HONI considering an investment model for Energy Storage Solutions that would facilitate equity participation of Indigenous communities. If yes, please describe how. If no, please explain why not.



**Question:**      **B3–Anwaatin–5**

**Reference:**      • ISD D-SS-05

**Preamble:**      HONI indicates that its worst performing feeders investment is an initiative identified in its system plan that seeks to address the reliability challenges faced by northern communities (including First Nations communities).

- a)      Of the 500 worst performing feeders serving over 600,000 customers, what number of feeders serve Indigenous communities? What proportion of the 600,000 customers are Indigenous customers?
- b)      Please explain in detail the manner in which the proposed worst performing feeders investment assists in addressing reliability challenges in Indigenous communities.
- c)      Please identify the measurable improvements to reliability HONI anticipates in northern Indigenous communities as a direct result of its worst performing feeders investment. Please provide any and all supporting reports, information, or data.

**Question: E–Anwaatin–6**

Reference: • Exhibit E, Tab 3, Schedule 2, Section 2.4

Preamble: HONI indicates that its vegetation management program is an initiative identified in its system plan that seeks to address the reliability challenges faced by northern communities (including First Nations communities).

- a) Please explain in detail the manner in which the vegetation management program assists in addressing reliability challenges in Indigenous communities.
- b) Please identify the measurable improvements to reliability HONI anticipates in northern Indigenous communities as a direct result of its vegetation management program. Please provide any and all supporting reports, information, or data.

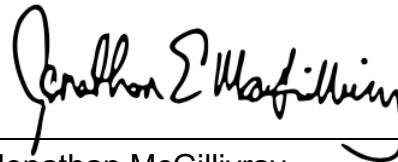
ALL OF WHICH IS RESPECTFULLY  
SUBMITTED THIS

26<sup>th</sup> day of October, 2021



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Lisa (Elisabeth) DeMarco  
Resilient LLP  
Counsel for Anwaatin



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Jonathan McGillivray  
Resilient LLP  
Counsel for Anwaatin