

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

April 4, 2022

**EB-2022-0006 – Kitchener-Wilmot Hydro Inc. and Waterloo North Hydro Inc.  
Application for Leave to Amalgamate  
Pollution Probe Interrogatories to the Applicants**

Dear Ms. Marconi:

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

Please reach out should you have any questions related to this material.

Respectfully submitted on behalf of Pollution Probe.



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John A.D. Vellone, BLG (via: [jvellone@blg.com](mailto:jvellone@blg.com))  
All Parties (via email)  
Richard Carlson, Pollution Probe (via email)

**ONTARIO ENERGY BOARD**

**Kitchener-Wilmot Hydro Inc.  
Waterloo North Hydro Inc.**

**Application for approval to amalgamate and continue  
operations as a single electricity distribution company**

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**POLLUTION PROBE INTERROGATORIES**

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**April 4, 2022**

**Submitted by: Michael Brophy  
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28 Macnaughton Road  
Toronto, Ontario M4G 3H4  
Consultant for Pollution Probe**

PP-1

- a) Kitchener-Wilmot Hydro Inc., Waterloo North Hydro Inc. and the respective municipalities they serve have been leaders in community energy and emissions planning. Please describe how these activities will be impacted, maintained or enhanced through the proposed merger.
- b) Please describe what support activities (including CDM support) the merger will maintain or enhance to support energy and emissions reporting and reductions requirements under Ontario Regulation 397/11 for the municipalities and all broader public sector (including university) buildings served.

PP-2

What protections (particularly over the 10 year deferred rebasing period) are in place to ensure that the communities with a lower proportion of proposed ownership for the merged entity will receive the support needed to achieve CDM (including requirements under Ontario Regulation 397/11) and/or community energy and emission plan objectives?

PP-3

Reference: Page 24 – “Customers will benefit by LDC MergeCo having additional resources to invest in innovation and new technologies that address their needs.”

Please describe what specific additional innovation and new technologies customers and communities will receive due to the proposed merger.

PP-4

Reference: 2021 OEB Conservation & Demand Management Guidelines for Electricity Distributors - [Conservation and Demand Management Guidelines for Electricity Distributors | Ontario Energy Board \(oeb.ca\)](#)

Please describe what activities (including CDM and distributed energy resources) outlined in the OEB 2021 CDM Guideline the merger will maintain or enhance locally and regionally.

PP-5

References:

Kitchener Climate Action Plans (community and corporate) - [Corporate sustainability - City of Kitchener](#)

TransformWR unanimously supported by all municipalities - [TransformWR: Waterloo Region's Transition to an Equitable, Prosperous, Resilient Low Carbon Community \(climateactionwr.ca\)](#)

- a) Please confirm that the merged entity will ensure that its business plan(s) and Distributions Service Plan(s) will be developed and implemented to support the local community energy and emission plan objectives, including TransformWR. If not confirmed, please explain why not.
- b) Please identify the local community energy and emission (including climate change) related committees and organizations (e.g. TransformWR) that the merged utility will participate in and whether that is an increase or decrease to the current level of community support for those types of activities.
- c) Please explain specifically how the proposed merger will enable incremental (if any) opportunities to help its communities meet their energy and emission reduction objectives.

PP-6

- a) When will the merged entity have an integrated Business Plan and Distribution System Plan (DSP) based on the merged entity and when would it be filed with the OEB?
- b) In the interim, how will the Business Plan and/or DSP be coordinated between the utilities?

PP-7

Will the merged entity have a Net Zero emission commitment? If yes, please describe the details. If not, please explain why not.