

May 2, 2022

#### **VIA RESS**

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

Dear Ms. Marconi,

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 the Anwaatin Inc. (**Anwaatin**) in in the above-noted proceeding. Please find attached the interrogatories of Anwaatin on HONI's updated evidence, filed pursuant to Procedural Order No. 5.

Sincerely,

**DT Vollmer** 

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)

## Question: O-Anwaatin-1

Reference: • Exhibit O, Tab 1, Schedule 1, Section 1.2

• Exhibit O, Tab 1, Schedule 2, Section 2.5.2

Preamble: Hydro One indicates that approach to address current inflation

projections in relation to costs included in the Investment Plan for 2023-

2027 is "customer centric".

a) Please discuss the specific impacts of Hydro One's approach to inflation projections on its Indigenous customers (on- and off-reserve) and any measures undertaken to ensure that Indigenous customers were considered in the development of Hydro One's "customer centric" approach.

- b) Please discuss the customer engagement activities Hydro One undertook to inform the development of its approach to inflation projections and file all related documents and reports.
- c) Please discuss the extent to which Hydro One undertook Indigenousspecific customer engagement to inform the development of its approach to inflation projections and file all related documents and reports.
- d) Hydro One indicates that "[i]f the cumulative inflation for 2022 and 2023 exceeds 10%, Hydro One will aim to manage its work program to the capped amount through investment reprioritization and redirection and will adjust the outcomes outlined in TSP Section 2.5 and DSP Section 3.5 accordingly."
  - i. Please discuss whether Hydro One considered or consulted Indigenous communities in setting the 10% threshold and file all related documents and reports.
  - Please discuss whether the proposed investment reprioritization and redirection mechanism is anticipated to impact or otherwise affect electricity reliability in remote and near-remote Indigenous communities.

# Question: O-Anwaatin-2

### Reference:

- Exhibit O, Tab 1, Schedule 1, Section 1.2
- Exhibit O, Tab 1, Schedule 2, Attachment 1
- Letter, February 7, 2022, Hydro One to Board re Postponement of Settlement Conference
- Letter, February 11, 2022, Hydro One to Board re Evidence Update and Schedule

### Preamble:

Hydro One's February 7, 2022 correspondence requesting postponement of the settlement conference and February 11, 2022 correspondence outlining the scope of evidentiary updates each refer to the "Consensus Forecast for Canadian CPI" as a justification for the need to update Hydro One's application.

- a) Please explain why the Inflation Update is based on the Scotiabank Capital Inflation Report and not the Consensus Forecast for Canadian CPI, which was referred to in the Hydro One correspondence giving rise to the application update.
- b) Please explain Hydro One's rationale for using the Scotiabank Capital Inflation Report and provide all related documents and reports.
- c) Did Hydro One undertake any analysis to compare and contrast the Scotiabank Capital Inflation Report and other inflation reports or forecasts? If so, please file the analysis and all related documents and reports. If not, please explain why not.

ALL OF WHICH IS RESPECTFULLY SUBMITTED THIS 2<sup>nd</sup> day of May 2022

Lisa (Elisabeth) DeMarco

Crothon & Mafilling

Resilient LLP

Counsel for Anwaatin

Jonathan McGillivray Resilient LLP

Counsel for Anwaatin