ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c. 15. Schedule B, as amended;

AND IN THE MATTER OF the Application of Hydro One Networks Inc. for an Order or Orders granting leave to construct an electricity transmission line between Chatham Switching Station and Lakeshore Transmission Station.

INTERROGATORIES OF THE MUNICIPALITY OF CHATHAM-KENT (THE "MUNICIPALITY")

Pursuant to the Board's Procedural Order No. 1 dated July 13, 2022, page 4, the Municipality requests the following relevant information and documents in advance of any further steps in this matter:

3.0-Prices: Project Cost

CK-1

Ref: Exhibit E, Tab 1, Schedule 1, p 3-4 of 6.

Hydro One's property agents have been meeting with affected property owners since 29 March 2021. The objective of these meetings has been to introduce Hydro One's land acquisition process. Independent site-specific property appraisals are on-going, and Hydro One is preparing voluntary property settlement offers based on these appraisals and the Company's Land Acquisition Compensation Principles.

. . .

The change to both of the above Option Agreements is Early Access (Schedule B, 5 clause 8b of the Easement Option; and Schedule B, clause 7b of the Fee Simple Option) while Hydro One's external conveyancer closes the Option Agreements. Another change to the Option to Purchase a Limited Interest – Easement is the addition of a liability clause (clause 3 of Schedule C). The change to the above Compensation and Incentive Agreements is a market value top-up (clause 1b) to recognize the dynamic real estate market in Ontario.

- 1. How will the Applicant account, and compensate landowners and impacted communities, for rising land costs in the project area?
- 2. Without limiting the foregoing, please elaborate on the market value top-up. Please explain any other measures adopted by the Applicant to compensate landowners and impacted communities for rising land costs.

3. Please provide any additional documentation and supporting material underlying the Applicant's accounting for increased land costs, including the market value top-up.

5.0-Reliability and Quality of Electricity Service

CK-2

Ref: Exhibit B, Tab 6, Schedule 1, p 1 of 1.

At the reference above, Hydro One states:

The new transmission line facilities will ensure that load in the Windsor-Essex area can be adequately supplied and avoid the potential for increased congestion in the west of Chatham area. The new line will also improve the reliability and quality of energy supply by providing an additional transmission path for system generation to be delivered to the area west of Chatham as well as preserve the Ontario-Michigan intertie capability.

- 1. How or does the project improve reliability or quality of service for:
 - a. Commercial customers in Chatham-Kent?
 - b. Residential customers in Chatham-Kent?
- Please provide any additional documentation, supporting material, and analysis concerning improvement of reliability or quality of service for commercial customers and residential customers.

Project Timelines

CK-3

Ref: Exhibit B, Tab 3, Schedule 1,

At the reference above, Hydro One states:

Hydro One concurs with the IESO's determination that there is a need to increase the long-term transmission capacity to the Windsor-Essex area by winter of 2025/2026.

1. How quickly can the project be completed and what has and can be done by Hydro One to expedite the project?

MUNICIPALITY OF CHATHAM-KENT

315 King Street West, P.O. Box 640, Chatham, ON N7M 5K8

David V. Taylor davet@chatham-kent.ca Tel: 519.352.8401 x3808

Lawyers for Chatham-Kent, Intervenor

TO: Hydro One Networks Inc. Carla Molina

Sr. Regulatory Coordinator Hydro One Networks Inc. 483 Bay Street, 7th Floor - South Tower Toronto, ON M5G 2P5 regulatory@hydroone.com

Applicant Counsel, Gordon Nettleton

McCarthy Tétrault LLP 4000, 421 – 7th Avenue SW Calgary ON T2P 4K9 Tel: 403-260-3622

Fax: 403-260-3501 gnettleton@mccarthy.ca

Monica Caceres

Assistant General Counsel Hydro One Networks Inc. 483 Bay Street, 8th Floor - South Tower Toronto ON M5G 2P5 monica.caceres@hydroone.com

Chippewas of Kettle and Philip Lee Stony Point First Nation

Chippewas of Kettle and Stony Point First Nation Southwind Development Corporation 9119 West Ipperwash Road, Unit A Kettle and Stony Point First Nation ON NON 1J1 philip.lee@southwindcorp.ca

Don Richardson, Consultant

Three Fires Group 9119 W. Ipperwash Rd. Unit A Lambton Shores ON N0N 1J3 don.richardson@threefiresgroup.com

Lisa (Elisabeth) DeMarco

Senior Partner and Chief Executive Officer Resilient LLP Bay Adelaide Centre 333 Bay Street, Suite 625 Toronto ON M5H 2R2 lisa@resilientllp.com

Chippewas of Kettle and Jonathan McGillivray Stony Point First Nation

Senior Associate, Resilient LLP Bay Adelaide Centre 333 Bay Street, Suite 625 Toronto ON M5H 2R2 ionathan@resilientllp.com

Chief Mary Duckworth

Caldwell First Nation
14 Orange Street
Leamington, ON N8H 1P5
ChiefMaryDuckworth@caldwellfirstnation.ca

Larry Sault

Consultant, Intergovernmental Relations/Major Business Caldwell First Nation 14 Orange Street Leamington ON N8H 1P5 soongikiniw@gmail.com

Environmental Defence Jack Gibbons Canada Inc.

Ontario Clean Air Alliance 160 John Street, Suite 300 Toronto ON M5V 2E5 jack@cleanairalliance.org

Kent Elson

Elson Advocacy 1062 College Street, Lower Suite Toronto ON M6H 1A9 kent@elsonadvocacy.ca

Amanda Montgomery

Elson Advocacy 1062 College Street, Lower Suite Toronto ON M6H 1A9 amanda@elsonadvocacy.ca

Haudenosaunee Tim Gilbert Development Institute

Gilbert's LLP 181 University Ave, Suite 2200 Toronto ON M5H 3M7 tim@gilbertslaw.ca

Aaron Detlor

Council
Haudenosaunee Development Institute
16 Sunrise Court, Suite 417
Ohsweken ON N0A1M0
aaron@detlorlaw.ca

Independent Electricity Devon Huber System Operator

Senior Manager Independent Electricity System Operator 1600-120 Adelaide Street West Toronto ON M5H 1T1 Devon.Huber@ieso.ca

Pollution Probe Michael Brophy

Consultant for Pollution Probe Michael Brophy Consulting Inc. 28 Macnaughton Road Toronto ON M4G 3H4 michael.brophy@rogers.com

The Ross Professional Quinn Ross Corporation Firm

The Ross Professional Corporation Firm 138 Courthouse Square Goderich ON N7A 1M9 gmross@rossfirm.com

AND TO: REGISTRAR

Ontario Energy Board

P.O. Box 2319 2300 Yonge Street, 27th Floor Toronto ON M4P 1E4 Registrar@oeb.ca

Case Manager: Andrew Bishop andrew.bishop@oeb.ca

OEB Counsel, Micheal Miller michael.millar@oeb.ca