

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

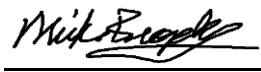
July 27, 2022

**Re: EB-2022-0140 – Hydro One Networks Inc. Leave to Construct Application – Chatham by Lakeshore
Pollution Probe Interrogatories to Applicant**

Dear Ms. Marconi,

In accordance with OEB direction, 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
Email: Michael.brophy@rogers.com

cc: Carla Molina, Hydro One Networks Inc. (via email to regulatory@HydroOne.com)
Gordon M. Nettleton, McCarthy Tétrault (via gnettleton@mccarthy.ca)
Monica Caceres, Hydro One Networks Inc. Counsel (via monica.caceres@hydroone.com)
All Parties (via email)
Richard Carlson, Pollution Probe (via email)

ONTARIO ENERGY BOARD

Hydro One Network Inc.

**Application for leave to construct an electricity transmission line between Chatham
Switching Station and Lakeshore Transmission Station**

POLLUTION PROBE INTERROGATORIES

July 27, 2022

**Submitted by: Michael Brophy
Michael Brophy Consulting Inc.
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Phone: 647-330-1217
28 Macnaughton Road
Toronto, Ontario M4G 3H4**

Consultant for Pollution Probe

Pollution Probe #1

- a) Please identify any specific improvements to system reliability that will result from the project.
- b) What reporting metrics (if any) will be used to demonstrate the projects contribution to reliability once in service.
- c) Please explain how this project will support increased DER capacity in Ontario.
- 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

- a) Please confirm the specific “Project” scope for Leave to Construct approval (including conditions of approval) purposes.
- b) Please provide details on any other facilities or projects incremental to the approvals sought in this Leave to Construct proceeding that would also need to be constructed to meet the incremental need identified in this application.
- c) Enbridge has also applied for a Leave to Construct (EB-2022-0157) to increase energy (natural gas) supply to south-western Ontario including many of the same customer needs. Please identify any coordination done to ensure that these independent projects are not duplicating energy supply to the same customers. If no coordination was done, please confirm.

Pollution Probe #3

Given the Order in Council dated March 31, 2022 outlining the need for the project, please explain why did Hydro One not simply request an exemption from an OEB Leave to Construct (e.g. what does Leave to Construct approval provide that an exemption would not).

Pollution Probe #4

Reference: “For approximately 16 km, the proposed line will be located in an idle 115 kV transmission corridor between Chatham and Tilbury. The existing idle transmission line structures, conductor and associated components will be dismantled, removed, and replaced, and the corridor will be widened to accommodate the proposed double circuit transmission line.” (EXHIBIT B, TAB 2, SCHEDULE 1, Page 2)

- a) Is the removal of the 115kV infrastructure part of the project scope for the Leave to Construct?
- b) Will there be a net salvage benefit related to removing the 115 kV infrastructure? If yes, please indicate the estimated value.
- c) How does the net salvage value (or incremental costs) for the 115 kV removal get passed along to rate payers (e.g. is it part of this project costs or will it be dealt with through an separate proceeding)

Pollution Probe #5

Reference: “The scope of this project included an extension - approximately 13 km - of two existing 230 kV circuits ...”. (Exhibit B-3-1, Attachment 2, Page 7).

Please reconcile the IESO recommendation for a 13 km section against Hydro One’s proposal for a 49 km section.

Pollution Probe #6

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

Pollution Probe #7

Please indicate if Hydro One may apply for expropriation of any property along the proposed right of way. If no, please confirm the basis for confirming that expropriation will not occur (e.g. are all land agreements and easements complete).

Pollution Probe #8

Please explain what capital (if any) has been OEB approved to fund the proposed project? If no capital approvals have been obtained, please explain how the project will be recovered from rate payers.