

**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 ROSS FIRM PROFESSIONAL CORPORATION (“THE ROSS FIRM”)**

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

Ref: Exhibit B, Tab 4, Schedule 1, Page 65

Reference is made to project categorization as “a non-discretionary project as it is being undertaken to comply with a mandatory requirement to satisfy obligations specified by the OEB in Hydro One’s transmission license as directed by government directives described in Exhibit B, Tab 3, Schedule 1”.

However, such document is not an OEB directive. Instead, it is the ordering Council and the IESO letter, but the license requirements are not described.

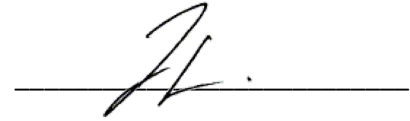
Section 4.3.2.3.2 of the Filing Requirements for Electricity Transmission states that the purpose of project categorization is to distinguish between a project that is “must do” beyond the control of the applicant (“non-discretionary”) and one that is at the discretion of the applicant (“discretionary”).

Section 4.3.2.3.2 of the Filing Requirements for Electricity Transmission Applications also classifies the reasons “reduce congestion” and “enhance reliability” as discretionary (to enhance transmission system performance).

Hydro One is still seeking OEB’s approval. It is not complying with a direction of the OEB re the transmission system’s reliability to be classified as “non-discretionary”, and consequently, a “must do”. “reduce congestion” and “enhance reliability” (discretionary characteristics) are the reasons Hydro One gave for the existence of the project in Exhibit B, Tab 6, Schedule 1 (page 67 of the Evidence) – Quantitative and Qualitative Benefits of the Project.

Please kindly provide clarification of, or reference to, the license requirements as opposed to the IESO directive or OIC.

July 27, 2022



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