

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

August 29, 2022

## Re: EB-2022-0140 – Hydro One Networks Inc. Leave to Construct Application – Chatham by Lakeshore Pollution Probe Letter of Comment

Dear Ms. Marconi,

Pollution Probe is in receipt of Procedural Order No. 2 for the above note proceeding which among other things sets out a process for Intervenors to submit requests for information related to:

- a) the price impacts of Hydro One's Environmental Assessment costs and costs related to Indigenous consultation activities,
- b) price and reliability impacts related to route selection, and/or
- c) price or reliability impacts related to the choice of tower or conductor technologies

Pollution Probe is also in receipt of the Ross Firm Group Motion dated August 26, 2022 which requests certain procedural direction including:

- HONI to lead evidence with respect to the preferred route AND route alternatives with respect to the interests of consumers with respect to prices and the reliability and quality of electricity service.
- requiring HONI to file in whole or in part the Draft Environmental Study Report as it relates to the interests of consumers with respect to prices and the reliability and quality of electricity service.

Pollution Probe is also in receipt of Hydro One's interrogatory responses dated August 10, 2022 in which Pollution Probe requested certain information related to the environmental assessment, environmental mitigation, route assessment and related cost estimate details. In Pollution Probe Interrogatory #6, a copy of the Environmental Assessment, a copy of proposed mitigation plans and related mitigation cost details were requested given their relevance to the route selection, mitigation and related costs. Hydro One's failed to provide an adequate and detailed response to the interrogatory and pointed to general mitigation and cost estimate information that was not adequately responsive to the request. Pollution Probe was also not able to locate Table 7.1 that Hydro One indicates contains certain summary information.



Pollution Probe is concerned that when interrogatories are submitted in accordance with Procedural Order No. 2, that Hydro One would use the same approach in its response to Pollution Probe Interrogatory #6 and not provide a sufficient level of details required for proposer review and consideration.

Should the Ross Firm Group Motion be approved by the OEB, this would likely provide the information Pollution Probe has requested. If that motion is denied, Pollution Probe requests that the OEB direct Hydro One to provide detailed mitigation and cost estimate information requested by Pollution Probe Interrogatory #6. Additionally, sufficiently detailed information should also be provided in response to any interrogatories filed per Procedural Order No. 2.

Respectfully submitted on behalf of Pollution Probe.

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