

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. 3 dated August 30, 2022, page 4, The Ross Firm requests the following relevant information and documents in advance of any further steps in this matter:

PART I

1) Price

Ref. #1: EB-2022-0140 – Hydro One Networks Inc. Leave to Construct Application – Chatham by Lakeshore – Update to Exhibit B-3-1, June 8, 2022 (“Application”), EXHIBIT B, TAB 7, SCHEDULE 1, Table 1; AND DRAFT Environmental Study Report, June 11, 2021 (“ESR”), page 2-2 (or page 37/305).

The Application’s referenced table provides the estimated capital cost of the Chatham x Lakeshore Line for the preferred route (namely, route 2A). The table includes a breakdown of the preferred route’s line costs with respect to (a) materials; (b) labour; (c) equipment rental & contractor costs; (d) sundry; (e) contingencies; (f) overhead; (g) allowance for funds used during construction; (h) real estate; and (i) the total cost of the line work.

Similarly, in its ESR, HONI indicated that it considered 8 route alternatives which it had undertaken to study before arriving to its preferred route (namely, route 2A).

- a. For each of the 7 alternative routes considered by HONI (namely, 1A, 1B, 1C, 1D, 2B, 2C, and 3A), we ask HONI to provide a breakdown of the capital costs in the same manner and detail as that provided for the preferred route (namely, route 2A).

2) Reliability & Quality

Ref. #2: EB-2022-0140 – Hydro One Networks Inc. Leave to Construct Application – Chatham by Lakeshore – Update to Exhibit B-3-1, June 8, 2022 (“Application”), EXHIBIT B, TAB 4, SCHEDULE 1 (or page 64/225).

In its Application, HONI indicated that the Chatham x Lakeshore Project is categorized as a “Development Project” that provides for additional system capacity and maintains reliability and quality of electricity supply.

- a. We ask HONI to provide detailed particulars as to how the preferred (namely, route 2A) compares, with respect to reliability and quality, to each of the 7 alternative routes that were studied by HONI (namely, 1A, 1B, 1C, 1D, 2B, 2C, and 3A).


PART II

3) Technologies Considered

Ref. #1: EB-2022-0140 – Hydro One Networks Inc. Leave to Construct Application – Chatham by Lakeshore – Update to Exhibit B-3-1, June 8, 2022 (“Application”), EXHIBIT B, TAB 4, 5, 6, 7, 7.1 , EXHIBIT C, TAB 1, SCHEDULE 1 .

With many countries experiencing difficulty in expanding transmission right-of-way, alternatives to the lattice tower construction proposed by HONI should be considered and evaluated to determine if monopole transmission structures, which require smaller right-of-way space can eliminate the need for expanded right-of-way and additional costs to ratepayers. HONI did not provide cost/benefit analysis demonstrating that they had considered the reliability/cost to ratepayers/landowners with alternatives to HONI's proposal for ACSR conductors and lattice towers (versus alternative such as, ACCC conductors and monopole towers.).

- a. We ask HONI to provide evidence is support of the lattice tower construction as opposed to the monopole construction with respect to price, reliability and quality of service.
- b. We ask HONI to provide evidence is support of the use of ACSR conductors as preferred over other conductor technologies with respect to price, reliability and quality of service.
- c. When providing the evidence referenced in b above, please also provide any projections as to future load demand in the project service area and the ability of the present proposed conductor technology to meet the future needs.



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