

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

September 9, 2022


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

Dear Ms. Marconi,

In accordance with Procedural Order No. 3, please find attached Pollution Probe's supplemental interrogatories to the Applicant in respect 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

Respectfully submitted on behalf of Pollution Probe.



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cc: Carla Molina, Hydro One Networks Inc. (via email to [regulatory@HydroOne.com](mailto:regulatory@HydroOne.com))  
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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**

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**POLLUTION PROBE  
SUPPLEMENTAL INTERROGATORIES**

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**September 9 2022**

**Submitted by: Michael Brophy  
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**Consultant for Pollution Probe**

Pollution Probe #1

Reference: “Hydro One does not have a reporting metric that will demonstrate the Project’s specific contribution to reliability.” [Exhibit I, Tab 6, Schedule 1b]

- a) Please detail what specific evidence is available to validate Hydro One’s claim that the proposed project will improve reliability (i.e beyond general claims that it will)?
- b) Please describe the quantitative metric(s) Hydro One has used to identify the reliability issue that the proposes project will resolve.
- c) What metric(s) will the OEB be able to use to validate that the project in fact delivered improved reliability as stated by Hydro One in its evidence?
- d) Would Hydro One be able to validate the enhanced reliability in the post-construction report to the OEB? If not, why not.

Pollution Probe #2

References:

“Natural gas is typically used for heat and carbon dioxide to feed the crops, whereas electricity is typically used for lighting and ventilation. So, while both projects may supply the same customers, the needs and purposes of each project are unique and not duplicative” [Exhibit I, Tab 6, Schedule 2]

“The Project as proposed is designed to reliably serve increased demands for firm service in the Panhandle Market, including, in particular, incremental demands from the greenhouse, automotive, and power generation sectors.” [EB-2022-0088 Exhibit A, Tab 2, Schedule 1 Page 2]

- a) If the OEB approves the request for an incremental natural gas transmission pipeline to serve increased electricity generation in the area (including the Brighton Beach Generating Station), why can that not be used to provide the incremental reliable electricity instead if increased electricity transmission infrastructure?
- b) Given the plans for increased electricity generation in the area from natural gas, what opportunity will that provide for exports of electricity to the broader system (grid) and will that enhance broader system reliability. Please explain in detail.
- c) Please provide a copy of all documentation (e.g. reports, presentations, etc.) that relate to leveraging natural gas power generation to increase electricity demand and maintain reliability.

Pollution Probe #3

Hydro One's response to Exhibit I, Tab 6, Schedule 3 did not answer the question asked. More specifically,

- a) Would Hydro One be able to expropriate lands if it had requested an exemption rather than filing for Leave to Construct approval?
- b) What other reason does Hydro One have for not requesting a Leave to Construct exemption from the OEB.
- c) Please detail the costs (by major activity and amount) that would have been saved if Hydro One received an exemption from the OEB rather than pursuing a full Leave to Construct proceeding.

Pollution Probe #4

Reference: [Exhibit I, Tab 6, Schedule 6]

"Chapter 7 of the draft Environmental Study Report ("ESR) for the Project describes the potential environmental effects (both natural and socio-economic environment) of the project as well as associated measures that Hydro One has committed to avoid, mitigate or restore these effects."

Chapter 7 of the ESR identifies significant features and required mitigation measure, but does not provide any information of guidance related to the costs estimates to avoid or mitigate impacts.

Please describe how Hydro One translated the detailed feature impacts and mitigation requirements in the ESR to arrive at the cost estimate in the application.

Pollution Probe #5

Reference: "Table 7-1 of the draft ESR provides a summary of the information included in Chapter 7." [Exhibit I, Tab 6, Schedule 6]

Pollution Probe was unable to find Table 7-1. Please provide a copy of the table in your response to this interrogatory.

Pollution Probe #6

Reference: “The environmental and socio-economic mitigation and restoration costs included in the line cost estimate is \$ 3.8M.” [Exhibit I, Tab 6, Schedule 6c]

- a) Please provide a detailed breakdown by specific activity for the cost estimate of \$3.8M related to environmental and socio-economic mitigation and restoration costs.
- b) Please provide all backup material used to develop the develop the environmental and socio-economic mitigation and restoration cost estimate.
- c) Did Hydro One leverage contractor estimations specific to this project to determine its environmental and socio-economic mitigation and restoration cost estimate? If yes, please provide a copy of those materials. If no, what other means did Hydro One use to validate that the cost estimate is reasonable.

Pollution Probe #7

- a) Please provide the total cost estimate related to potential expropriation activities for the proposed project. Please break the estimate down into components of costs to the extent possible.
- b) Please provide an estimate of the costs related to an OEB proceeding for expropriation should that be required.
- c) Have the costs related to expropriation (including potential proceeding) been including in the costs estimate for this proceeding or will they be incremental to the project costs estimated in this proceeding? If they are included, please provide all evidence references.