



September 9, 2022

**VIA RESS**

Ontario Energy Board  
P.O. Box 2319,  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4  
Attention: Registrar

Dear Ms. Marconi,

**Re: Hydro One Networks Inc. ("HONI")  
Leave to Construct Application – Chatham by Lakeshore  
Board File No.: EB-2022-0140**

We are counsel to Three Fires Group Inc. ("**Three Fires**") in the above-noted proceeding. Please find enclosed the supplemental interrogatories of Three Fires to HONI, pursuant to Procedural Order No.2.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Vollmer".

DT Vollmer

- c. C. Molina, HONI
- M. Caceres, HONI
- GM Nettleton, McCarthy Tétrault
- Chief Duckworth and L. Sault, Caldwell First Nation
- P. Lee and D. Richardson, Three Fires
- All intervenors in EB-2022-0140

Encl.

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sched. B, as amended (the “**Act**”);

**AND IN THE MATTER OF** an Application by Hydro One Networks Inc. (“**HONI**”) pursuant to s. 92 of the Act for an Order or Orders granting leave to construct transmission line facilities (the “**Project**”) in the West of Chatham area.

**AND IN THE MATTER OF** an Application by Hydro One Networks Inc. pursuant to s. 97 of the Act for an Order granting approval of the forms of land use agreements offered or to be offered to affected landowners. (the “**Application**”).

**EB-2022-0140**

**SUPPLEMENTAL INTERROGATORIES**

**OF**

**THREE FIRES GROUP INC. (“THREE FIRES”)**

**September 9, 2022**

**Question: 1–Three Fires–1**

- Reference:
- Exhibit B, Tab 1, Schedule 1
  - Hydro One Indigenous Relations Policy

Preamble: HONI notes that it has been engaging with communities since early in the development process and that it will continue to engage impacted Indigenous communities throughout the life cycle of the Project.

HONI's Indigenous Relations Policy provides that HONI has the goal of achieving "the agreement and support, articulated in UNDRIP as "Free Prior and Informed Consent", of Indigenous peoples" and recognizes the "obligations industry has in Reconciliation with Indigenous people, to address meaningful and measurable change in cultural understanding and economic outcomes."

In Procedural Order No. 2 ("**PO2**"), dated August 23, 2022, the Board indicated that reasonableness of Hydro One's estimates of the cost of the Project is an issue in this proceeding and the OEB accepts that costs related to Indigenous engagement may have an impact on the total Project costs.

- a) Please outline the extent to which HONI has analyzed Indigenous rights and territorial claims to support its approach to the Project and manage costs associated with Indigenous consultation.
- b) Please outline the extent to which HONI would benefit from a one-window Indigenous consultation coordinating entity for the Project on all relevant issues.
- c) Please quantify the impact on Project costs that HONI would anticipate from a one-window Indigenous consultation coordinating entity for the Project on all relevant issues.

**Question: 1–Three Fires–2**

Reference: Exhibit B, Tab 6, Schedule 1  
Exhibit C, Tab 1, Schedule 1

Preamble: HONI states that “the NPV energy price sensitivity analysis confirms that the 1443 kcmil conductor is the most prudent method to meet the needs of the Project”.

HONI also notes that it will make use of 159 self supported lattice towers with nominal spans of 350m and 10 H-frame structures used to cross other transmission lines.

In PO2, the Board indicated that questions regarding the tower and conductor technologies selected by HONI are in scope as the selection may impact price or reliability.

- a) Please discuss reliability impacts and/or improvements related to the choice of tower for:
  - (i) HONI customers generally; and
  - (ii) Indigenous customers.
  
- b) Please discuss reliability impacts and/or improvements related to the choice of conductor technologies for:
  - (i) HONI customers generally; and
  - (ii) Indigenous customers.

**Question:** 1–Three Fires–3

**Reference:** • Exhibit B, Tab 6, Schedule 1

**Preamble:** HONI notes that the Project will also improve the reliability and quality of energy supply by providing an additional transmission path for system generation to be delivered to the area west of Chatham as well as preserve the Ontario-Michigan intertie capability.

In PO2, the Board indicated a review of the cost and potential ratepayer (including Indigenous ratepayers) and reliability implications of HONI’s proposed route is in scope of this proceeding.

a) Please discuss HONI’s assessment of the reliability impacts and/or improvements of the proposed line. In your discussion, please quantify the anticipated impacts on SAIDI, SAIFI, and DPUI following the completion of the Project by completing the below (or similar) tables for both (i) HONI customers generally and (ii) Indigenous customers:

(i) Frequency of Momentary Interruptions

	2021	2022 (estimate)	Y1**
<b># of momentary interruptions for HONI customers</b>			
<b># of momentary interruptions for Indigenous customers</b>			
<b># of DPs in Project area</b>			
<b>T-SAIFI-m*</b>			

\*T-SAIFI-m = Total number of momentary interruptions / total number of DP monitored

\*\*Y1 = First full in service year following completion of the Project

(ii) Frequency of Sustained Interruptions

Year	2021	2022 (estimate)	Y1
<b># of sustained interruptions for HONI customers</b>			
<b># of sustained interruptions for Indigenous customers</b>			
<b># of DPs in Project area</b>			
<b>T-SAIFI-s*</b>			

\*T-SAIFI-s = Total number of sustained interruptions / total number of DP monitored

(iii) Overall Frequency of Interruptions

Year	2021	2022 (estimate)	Y1
# of overall interruptions for HONI customers			
# of overall interruptions for Indigenous customers			
# of DPs in Project Area			
<b>T-SAIFI-all*</b>			

\*T-SAIFI-all = Total number of momentary and sustained interruptions / total number of DP monitored

(iv) Duration of Sustained Interruptions

Year	2021	2022 (estimate)	Y1
Duration of sustained interruptions (minutes) for HONI customer			
Duration of sustained interruptions (minutes) for Indigenous customer			
# of DPs in Project Area			
<b>T-SAIDI*</b>			

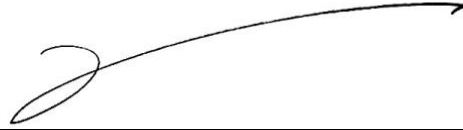
\*T-SAIDI = Total duration of sustained interruptions / total number of DP monitored

(v) Delivery Point Unreliability Index

Year	2021	2022 (estimate)	Y1
Total Unsupplied Energy (MW x minutes) for HONI customers			
Total Unsupplied Energy (MW x minutes) for Indigenous customers			
System Peak Load (MW)			
<b>DPUI*</b>			

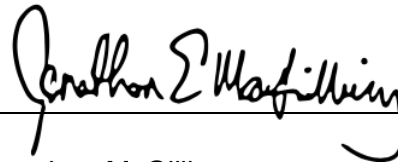
\*DPUI = Total unsupplied energy / system peak load

ALL OF WHICH IS RESPECTFULLY  
SUBMITTED THIS  
9<sup>th</sup> day of September, 2022



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Lisa (Elisabeth) DeMarco  
Resilient LLP  
Counsel for Three Fires



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Jonathan McGillivray  
Resilient LLP  
Counsel for Three Fires