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October 17, 2022

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

**Re: St. Thomas Service Area Amendment
Board File No.: EB-2022-0178**

Dear Ms. Marconi,

Please find enclosed the 2022 Entegrus Powerlines Inc. (“Entegrus”) service area amendment application (“the Application”) to include the property and industrial customer (the “Customer”) located at 1 Cosma Court, St. Thomas, ON N5R 4J5 (the “Subject Area”). In accordance with the OEB’s Rules of Practice and Procedure, a non-confidential, redacted version and a confidential, unredacted version have been submitted today via the Board’s web portal.

For reasons stated below, as part of the Application, Entegrus requests that the OEB confirm that it is acceptable and appropriate for Entegrus to share and discuss the Application with the Customer. Entegrus requests that the OEB provide direction on this item, before other procedural steps (such as publication of the Application on the OEB website or filing of evidence by Hydro One).

Entegrus is making this Application to the Ontario Energy Board (“OEB”) pursuant to Section 74(1) of the Ontario Energy Board Act, 1998 for the purpose of amending the licensed service area of Entegrus as described in Schedule 1 of its Distribution Licence ED-2002-0563 to include the Customer. The Subject Area is currently listed as an exclusion in the Entegrus Distribution Licence, although the Subject Area is surrounded by the Service Area of Entegrus and falls within the longstanding municipal boundaries of the City of St. Thomas. Entegrus has long served as the physical distributor for the Customer and continues to do so. The Customer is currently served by Hydro One Networks Inc. (“Hydro One”).

Entegrus has prepared the Application in accordance with the principles articulated in the Board's Filing Requirements for Service Area Amendment Applications, dated March 12, 2007, and included as Chapter 7 of the Filing Requirements for Transmission and Distribution Applications, together with the Board's Decision with Reasons in the RP-2003-0044 combined service area amendments proceeding.

Hydro One serves the Customer under the terms of a 1997 letter between Hydro One and Entegrus’ predecessor, St. Thomas Energy. Entegrus owns and maintains the express feeders that serve the Customer and thereby continues to act as the physical distributor. Under the OEB’s process to eliminate Long-Term Load Transfer (“LTLT”) arrangements, the Customer should have been transferred from Hydro One to Entegrus’ predecessor, St. Thomas Energy, in 2017. That did not happen. Hydro One does not agree that the Customer should now be transferred to Entegrus. Instead, Hydro One seeks to rely on the 1997 letter to continue to serve the Customer and to purchase the Entegrus express feeders that serve the Customer for a fraction of their replacement value. As set out in the Application, the 1997 letter is inconsistent with the

OEB's current LTLT elimination policy. The Customer should be served by Entegrus. Additionally, it cannot be said that the two dedicated Entegrus express feeders that serve the Customer are "surplus to the utility's needs". If the Customer and the use of the express feeders is transferred to Entegrus, then the utility can use some of the capacity on the express feeders to serve growing demand in St. Thomas. This will save ratepayers money, by reducing the need for new infrastructure. In these circumstances, Entegrus seeks this SAA to transfer the Customer to Entegrus and does not believe that Hydro One's position (and which would require OEB approval under section 86(1)(b) of the OEB Act for transfer of distribution assets) is consistent with OEB policy or in the public interest.

On May 31, 2022, in advance of completing the Application, Entegrus made information requests to Hydro One, in order to include all necessary and relevant information in the evidence. Entegrus also requested consent from Hydro One to discuss the Application with the Customer and report on the Customer's preferences. In mid-June 2022, Hydro One responded and declined to provide most of the requested information, indicating that it would not consent to Entegrus contacting the Customer, and further noted that it would contest the Application. On October 5, 2022, Entegrus provided a draft of the redacted Application to Hydro One and requested that Hydro One confirm its position on providing the remaining information/consent sought by Entegrus, as well as confirmation as to whether Hydro One would support or contest this Application. Hydro One responded on October 14, 2022 and reconfirmed that it would not provide the information/consent sought by Entegrus and that it would contest the Application.

Accordingly, although Entegrus has shared a redacted copy of the Application with Hydro One in advance of filing, Entegrus has not shared the Application with the Customer, because Hydro One objects.

Therefore, as noted above, Entegrus requests that the OEB confirm that it is acceptable and appropriate for Entegrus to share and discuss the Application with the Customer. Entegrus requests that the OEB provide direction on this item as soon as practical, and before other procedural steps (such as publication of the Application on the OEB website or filing of evidence by Hydro One).

Entegrus requests that the OEB set a process to allow this Application to be determined as soon as practical, as Entegrus has upcoming capacity constraints in its St. Thomas service area, and it is important to have clarity about whether the excess capacity from the breaker positions currently used to serve the Customer will be available for Entegrus to serve other capacity requirements in St. Thomas. If this will not be the case, then Entegrus needs to pursue alternative solutions (which will take some time).

In accordance with the OEB's revised Practice Direction on Confidential Filings effective December 17, 2021, Entegrus is requesting confidential treatment of the following application references. Details related to the confidential treatment sought (all of which fits within the OEB's "presumptively confidential" category) are set out below:

Application Reference	Description	Confidential Information Location	Brief Description	Basis for Confidentiality Claim
Section 5.1	Application Body	Page 10	Customer load profile and energy use detail	Information that would disclose load profiles, energy usage and billing information of a specific customer that is not personal information.
Section 5.5	Application Body	Page 16	Customer load profile and energy use detail and supply planning	Information that would disclose load profiles, energy usage and billing information of a specific customer that is not personal information.
Section 5.5.3	Application Body	Page 20	Customer load profile and energy use detail and supply planning	Information that would disclose load profiles, energy usage and billing information of a specific customer that is not personal information.
Section 5.5.4	Application Body	Page 21	Customer load profile and energy use detail	Information that would disclose load profiles, energy usage and billing information of a specific customer that is not personal information.
Section 5.5.4 (multiple bullet points)	Application Body	Pages 22-23	Customer load profile and energy use detail and supply planning	Information that would disclose load profiles, energy usage and billing information of a specific customer that is not personal information.
Section 5.5.4	Application Body	Page 23	Customer load profile and energy use detail	Information that would disclose load profiles, energy usage and billing information of a specific customer that is not personal information.
Section 5.9	Application Body	Page 25	Customer load profile and energy use detail and supply planning	Information that would disclose load profiles, energy usage and billing information of a specific customer that is not personal information.

If you have any questions, please do not hesitate to contact the undersigned.

Regards,

[Original signed by]

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