



By RESS and Email

October 28, 2022

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

Dear Ms. Marconi:

Subject: Hydro One Networks Inc. Service Area Amendment Application
Ontario Energy Board File Number: EB-2022-0234

Pursuant to the Ontario Energy Board's Notice of Hearing and Procedural Order No. 1, issued October 7, 2022, Hydro Ottawa Limited ("Hydro Ottawa") hereby submits the attached interrogatories to Hydro One Networks Inc. (Hydro One), with regard to the subject Service Area Amendment (SAA) Application, filed, August 18, 2022 to amend Hydro Ottawa's (ED-2002-0556) service territory and distribution licence.

Please do not hesitate to contact me should you require further information.

Sincerely,

DocuSigned by:
April Barrie
1E403775748B4CB
April Barrie
Director, Regulatory Affairs
Directeur, Affaires réglementaires
aprilbarrie@hydroottawa.com
Tel./tél.: 613 738-5499 | ext./poste 2106
Cell.: 613 808-3261

Cc:

Joanne Richardson, Director, Regulatory Affairs, Hydro One Networks Inc.
Jeffrey Smith, Director Regulatory Compliance, Hydro One Networks Inc.
Pasquale Catalano, Sr. Regulatory Advisor, Hydro One Networks Inc.
Shuo Zhang, Case Manager, Ontario Energy Board
James Sidlofsky, Counsel, Ontario Energy Board
Pierre-Paul Beauchamp, Municipality of Casselman
Yves Morrissette, Municipality of Casselman
Pascal Doucet, Municipality of Casselman
Mireille Groleau, Municipality of Casselman
Claudio Bertone

1 Procedural Order 1

2

3 THE ONTARIO ENERGY BOARD ORDERS THAT:

4

5 Hydro One and Hydro Ottawa shall request any relevant information and documentation from
6 each other that is in addition to the evidence filed with the OEB and that is relevant to the
7 hearing, by written interrogatories filed with the OEB and delivered to all parties by **October 28,**
8 **2022.**

9

10 **Interrogatories**

11

12 **HOL 1.**

13

14 **Reference: Attachment 6 of Hydro One's SAA Application**

15 **Hydro One Submission dated 2022-09-09, page 4 line 12**

16

17 **Questions:**

18

19 Please confirm:

20

a. When the customer requested an Offer to Connect (OTC) from Hydro One?

21

b. The date when Hydro One had the relevant information to provide the customer at
22 626 Principale Street, Casselman an Offer to Connect.

23

c. What information was received by Hydro One on this date?

24

d. Who provided the information?

25

e. Attachment 6 indicates a contract preparation date of June 6, 2022. When was the
26 Offer to Connect provided to the customer?

27

f. Is there a signed version of Attachment 6? If so please provide it.

28

g. Hydro One indicated Hydro Ottawa delayed the process by a year and a half while
29 Hydro One's Offer to connect was not provided to the customer prior to June 6,

30

2022 (at the earliest) :

- 1 i. Please explain what delayed Hydro One from providing the letter of offer to
2 connect to the customer? (Hydro Ottawa's Offer to Connect was supplied
3 August 26, 2022)
4 ii. Please explain how Hydro One providing an Offer to Connect on or after
5 June 6, 2022 did not delay the process?
6

7 **HOL 2.**
8

9 **Reference: Please see Attachment HOL IR HONI-2(A) Economic efficiency email**
10

11 **Preamble:**
12

13 The email is an exchange between Hydro One and Hydro Ottawa between June 13 and
14 June 27, 2016. Hydro Ottawa had been contacted about a customer that requested a
15 connection along the two distributors boundary line on June 22, 2016. A Hydro One
16 employee, John Boldt, stated "Both of our utilities need to prepare an OTC" and further
17 stated "whoever is most economically efficient will become the physical LDC". Further, on
18 June 27 a different Hydro One employee, Angela Yorgiadis, clarified "On June 22, 2016 a
19 Hydro One employee stated "Both of our utilities needed to prepare an OTC".
20

21 **Questions:**
22

- 23 a. Please confirm if the process described in email by Hydro One staff is still the
24 process Hydro One uses for customers at distributor boundaries?
25 b. Please confirm in this email that Hydro One indicated that economic efficiency from
26 a customer's view should include cost of connection and 25 year revenue?
27 c. Please confirm if Hydro One has used revenue, over the appropriate revenue
28 horizon, to determine if a customer connection request at utility boundaries met an
29 economic efficiency test?
30

1 **HOL 3.**

2

3 **Reference: Hydro One SAA Attachment 10, email dated July 11, 2022 from Dhaval**
4 **Patel (Hydro One employee) to Kevin Perez-Lau (Hydro Ottawa employee)**

5

6 **Questions:**

7

8 As it pertains to the estimate for the pole work requested by Hydro Ottawa to Hydro One to
9 facilitate connecting 626 Principale Street, Casselman by Hydro Ottawa, please:

- 10 a. Confirm the level of estimate for the pole work provided and the level of accuracy?
11 b. Provide the accounting life of the poles that would require upgrading.
12 c. Provide the remaining years of depreciation of the poles.
13 d. Confirm if there are any other projects that Hydro One is aware of that could impact
14 these poles? (including but not limited to the *Building Broadband Faster Act*, or
15 other system service, access or renewal projects.)

16 If yes,

- 17 i. Provide the timing of the projects.
18 ii. Are the projects included in the proposed or approved revenue requirement?
19 iii. Are the projects planned to have capital contribution(s)?
20 iv. Are the projects funded in any way?

21

22 **HOL 4.**

23

24 **Reference: Hydro One SAA Attachment 10, email dated July 11, 2022 from Dhaval**
25 **Patel (Hydro One employee) to Kevin Perez-Lau (Hydro Ottawa employee)**

26

27 **Questions:**

28

29 As it pertains to the estimate for the pole work requested from Hydro Ottawa to Hydro One
30 to facilitate connecting 626 Principale Street, Casselman by Hydro Ottawa, please provide
31 the following details regarding the estimate:

- 32 a. Material costs

- 1 b. Labour costs (including labour hours and labour rate)
- 2 c. Contract costs
- 3 d. Overhead costs
- 4 e. Contingencies
- 5 f. Other, please provide details

6

7 **HOL 5.**

8

9 **Reference: Hydro One Submission dated 2022-09-09, page 1. Sub-bullets**

10

11 **Question:**

12

13 As it pertains to the estimate for the pole work requested from Hydro Ottawa to Hydro One
14 to facilitate connecting 626 Principale Street, Casselman by Hydro Ottawa, please provide
15 the estimated time when Hydro One can complete the work?

16

17 **HOL 6.**

18

19 **Reference: Hydro One Service Area Amendment, Attachment 1: Customer's Letter of**
20 **Support**

21

22 **Question:**

23

24 For the customer at 626 Principale Street, Casselman, as part of Hydro One's SSA
25 Application, Hydro Ottawa note's Claudio Bertone provided the letter without reference to
26 Ford Motor Company of Canada Limited, please confirm,

27

28

29

30

31

- a. What customer was providing the letter of support?
- b. Ford Motor Company of Canada Limited was aware of the letter.
- c. Ford Motor Company of Canada Limited provided consent that Claudio Bertone would support this application in their name.
- d. Provide Ford Motor Company of Canada Limited's written consent.

1 **HOL 7.**

2

3 **Reference: Notice of Hearing and Procedure Order No. 1, dated October 7, 2022**
4 **Hydro One Affidavits of service dated submitted October 7, 2022**

5

6 **Preamble:**

7

8 Item 2. Under Service of Notice and Procedural Order No. 1 states:

9

10 "Hydro One is directed to immediately serve this Notice and Procedural Order,
11 the Application and the evidence on the Customer." [Emphasis added]

12

13 **Question:**

14

15 It was noted in Hydro One affidavits of service as response to the Notice of Hearing and
16 Procedure Order No. 1, that Hydro Ottawa's evidence was not served to Ford Motor
17 Company of Canada Limited.

18 a. Please confirm it is an accurate statement that Hydro One did not serve Hydro
19 Ottawa's evidence.

20 b. If so, please confirm why Hydro One did not serve Hydro Ottawa's evidence?

21 c. Please confirm if Hydro One, also did not serve their own evidence dated
22 September 9, 2022?

23

24 **HOL 8.**

25

26 **Reference: Hydro One Affidavits of service dated October 7, 2022**

27

28 **Question:**

29

30 It was noted that Hydro One served Claudio Bertone with the Notice and Procedural Order
31 and Hydro One's Original SAA Application. It was also noted that Ford Motor Company of
32 Canada Limited was added under Claudio Bertone's name.

- 1 a. Please confirm previous to the affidavits of service, Claudio Bertone did not
2 include Ford Motor Company of Canada Limited under his name in evidence as
3 part of this proceeding.
- 4 b. Please confirm the email address of Claudio Bertone does not contain a
5 reference to Ford Motor Company of Canada Limited.
- 6 c. Please confirm Hydro One has received written confirmation of consent from
7 Ford Motor Company of Canada Limited that Claudio Bertone is to represent
8 them as part of this proceeding.
- 9 d. Please provide the written consent, if received.

10

11 **HOL 9.**

12

13 **Reference: Notice of Hearing and Procedure Order No. 1, dated October 7, 2022**

14 **Hydro One Affidavits of service dated October 7, 2022**

15

16 **Preamble:**

17

18 Item 3. Under Service of Notice and Procedural Order No. 1 states:

19

20 Hydro One and Hydro Ottawa shall post a copy of this Notice and Procedural
21 Order, the Application and the evidence on each of their respective websites. [Emphasis
22 added]

23

24 **Question:**

25

26 It was noted in Hydro One affidavits of service in response to the Notice of Hearing and
27 Procedure Order No. 1, Hydro Ottawa's evidence was not posted on its website provided.

- 28 a. Please confirm this is an accurate statement.
- 29 b. If accurate, please confirm why Hydro One did not post Hydro Ottawa's
30 evidence?
- 31 c. Please confirm, Hydro One also did not post their own evidence dated
32 September 9, 2022?

1 **HOL 10.**

2

3 **Reference: Notice of Hearing and Procedural Order No. 1 (EB-2022-0234)**

4

5 **Preamble:**

6

7 In the Notice of Hearing and Procedural Order No. 1 the following statement was made:

8

9 "The OEB considers that document to be Hydro Ottawa's dispute of the Hydro One
10 Application. It would not be appropriate to treat it as an application in its own right,
11 because the subject property is already in the Hydro Ottawa service area. Accordingly,
12 the OEB has assigned a single file number to this proceeding."

13

14 **Questions:**

15

16 With reference to the statement made in the procedural order provided as part of this
17 question:

18

19 a. Do Hydro One agree with the statement from the Notice of Hearing and
20 Procedural order above that the development, in full, resides in Hydro Ottawa's
21 service territory, prior to the Interim Order dated September 26, 2022?

22

23 b. Please confirm that, although the address of the connection at 626 Principale
24 Street, Casselman is located in Hydro Ottawa's service territory, a portion of the
25 development, resides in Hydro One territory.

26

27 c. Please point to any and all references where in Hydro One's evidence a
28 reference to this can be found?

29

30 **HOL 11.**

31

32 **Reference: Hydro One Submission dated 2022-09-09, page 1. Sub-bullets 2**

33

34 **Hydro One Submission dated 2022-09-09, page 5 starting at 25 to page 7**

35 **line 21**

36

1 **Preamble:**

2

3 Definitions per the Distribution System Code

4

5 “load transfer” means a network supply point of one distributor that is supplied through the
6 distribution network of another distributor and where this supply point is not considered a
7 wholesale supply or bulk sale point;

8

9 “load transfer customer” means a customer that is provided distribution services through a
10 load transfer;

11

12 “geographic distributor,” with respect to a load transfer, means the distributor that is licensed
13 to service a load transfer customer and is responsible for connecting and billing the load
14 transfer customer;

15

16 “physical distributor”, with respect to a load transfer, means the distributor that provides
17 physical delivery of electricity to a load transfer customer, but is not responsible for
18 connecting and billing the load transfer customer directly;

19

20 **Question:**

21

22 For the temporary connection at 626 Principale Street, Casselman (therefore prior to the
23 OEB amending Hydro Ottawa’s Distribution license on an interim basis per Interim Order
24 dated September 26, 2022), please confirm:

25

a. If Hydro One considered the temporary connection to the customer to be in
26 Hydro Ottawa’s service territory?

27

b. When Hydro One advised Hydro Ottawa of the scheduled energized date?

28

c. When Hydro One advised Hydro Ottawa the customer was energized?

29

d. Hydro One supplied the customer energy from Hydro One’s distribution network,
30 metered the customer and billed the customer?

31

e. That the temporary connection at 626 Principale Street, Casselman was not a
32 temporary load transfer customer?

1 f. Please provide the temporary customer's rate class for billing purposes.

2

3 **HOL 12.**

4

5 **Reference: Hydro Ottawa Hydro Ottawa's dispute of the Service Area Amendment**

6 **Application - September 2, 2022**

7 **Hydro One Service Area Amendment Section 7.3.3.**

8

9 **Preamble:**

10 "Approval of this SAA will not result in any negative impacts on cost, rates,
11 service quality, and reliability and will arguably improve service quality by being
12 ready to connect the Customer by the connection date requested, subject to
13 OEB approval." [Emphasis Added]

14

15 **Questions:**

16

17 In reference to the statement above regarding no negative impact to the customer at 626
18 Principale Street, Casselman:

19 a. Please confirm the sample bill estimate for Hydro One completed by Hydro
20 Ottawa in its Letter of Dispute submitted to the OEB September 2, 2022, if using
21 the same assumptions provided in the letter, is a reasonable bill estimate for 626
22 Principale Street, Casselman?

23 b. If not, please provide a bill sample using the same assumptions (for example
24 remove temporary bill rates and charges and use 2023 rates).

25 c. How did Hydro One determine the rates would not negatively impact the
26 customer?

27 d. What tolerances/thresholds were used in the case of 626 Principale Street,
28 Casselman to determine there was no negative rate impact?

29 e. Other than connection costs, was Hydro One including any other costs to the
30 customer?

31 i. If yes, please describe.

1 ii. If yes, please describe the tolerances/thresholds that were used in the
2 case of 626 Principale Street, Casselman to determine there was no
3 negative rate impact?

4 f. Please provide the remaining capacity that serves the 44kV overhead circuit to
5 Hydro One's Casselman distribution?
6

7 **HOL 13.**

8

9 **Reference: Hydro One Service Area Amendment, Attachment 1: Customer's Letter of**
10 **Support**

11

12 For Ford Motor Company of Canada Limited (permanent customer) at 626 Principale Street,
13 Casselman, please provide:

- 14 a. What rate class the customer will be in.
15 b. What the customer's estimated monthly bill would be.
16 c. Material that has been provided to the customer regarding rates and monthly
17 billing.
18

19 **HOL 14.**

20

21 **Reference: Hydro One Submission dated 2022-09-09, page 15, lines 1 to 21**
22 **Hydro One Submission dated 2022-09-09, page 1, sub bullet 2**

23

24 **Preamble:**

25

26 Hydro One Submission dated 2022-09-09, page 15, lines 1 to 21

27

28 These lines 8 and 9 state "At this time, Hydro One would like to clarify that no agreement to
29 serve the Customer on a temporary basis was ever made at the April 29, 2022, meeting."
30

1 **Questions:**

2

3 The meeting minutes of April 29, 2022 appear to be detailed:

4 a. Please confirm the meeting minutes did not indicate Hydro One informed Chris
5 Murphy that Hydro One would not support a temporary connection?

6 b. Please confirm that Hydro One did not inform Chris Murphy, in response to his
7 request, that Hydro One thought Hydro Ottawa's proposed arrangement would
8 contravene the Distribution System Code?

9 c. After the April 29, 2022 meeting did Hydro One inform Hydro Ottawa they
10 thought Hydro Ottawa's proposed solution contravened the Distribution System
11 Code?

12

13 **HOL 15.**

14

15 **Reference: Hydro One Service Are Amendment, Attachment 1: Customer's Letter of**
16 **Support**

17

18 **Preamble:**

19

20 "We have been informed by Hydro One, that you will be able to supply our
21 development project with Hydro Power, more rapidly and more economically
22 than any other alternative supplier."

23

24 **Questions:**

25

26 In regard to the letter of support provided by Claudio Bertone:

27 a. Please provide any written documentation demonstrating that Hydro One will be
28 able to supply the development at 626 Principale Street, Casselman more rapidly
29 and more economically than any other alternative supplier"

30 b. If no written documents are available, please provide a summary of what was
31 provided or relied upon to support this understanding?

- 1 c. Who's economics was Hydro One considering in reference to the statement
2 above? Specifically, specify how Claudio Bertone and separately Ford Motor
3 Company of Canada Limited were considered.
- 4 d. Did Hydro One inform Claudio Bertone that Hydro Ottawa's rates are lower than
5 Hydro One's?
- 6 e. Did Hydro One inform Ford Motor Company of Canada Limited that Hydro
7 Ottawa's rates are lower than Hydro One's?
- 8 f. Did Hydro One provide the customer with information regarding what it would
9 cost if Hydro Ottawa connected the service? If so, please provide any written
10 documentation and communication. If none are available please summarize
11 what was provided.
- 12 g. Did Hydro One explain the economic evaluation process? If so, please provide
13 any written documentation and communication. If none are available please
14 summarize what was provided.
- 15

16 With reference to letter of support provided by Claudio Bertone:

- 17 a. Please provide any written documentation provided to the customer in order to
18 support their understanding in order to write the letter in Attachment 1.
- 19 b. Please provide any written documentation provided to the customer in order to
20 support the letter in Attachment 1.
- 21 c. It is noted that Ford Motor Company of Canada Limited is not referenced in the
22 Attachment 1 letter. It is also noted that the wording specifically states "will be
23 able to supply our development project" [Emphasis added]
- 24 i. Did Hydro One believe this letter indicated Ford Motor Company of
25 Canada Limited supported the application?
- 26 ii. If yes, please explain what in the letter indicated the permanent customer,
27 rather than the developer, supported the SAA Application?

1 **HOL 16.**

2

3 **Reference: Hydro One Service Area Amendment Section 7.1.2 sub-bullet 4.**

4 **Hydro One Submission dated 2022-09-09, page 2. Sub-bullets 3. A.**

5

6 **Preamble:**

7 "Hydro One's proposed SAA will not result in any stranded or duplicated
8 assets."

9

10 **Questions:**

11

12 a. How many Hydro One poles, from Hydro One's Casselman distribution station to
13 626 Principale Street, Casselman, are built on the opposite side of the same
14 street/road as a Hydro Ottawa pole in Hydro Ottawa's service territory?

15 b. When were these poles installed?

16

17 **HOL 17.**

18

19 **Reference: Hydro One Submission dated 2022-09-09, page 2. Sub-bullets 3. a.**

20

21 **Questions:**

22

23 In relation to the property in comparison to Hydro One's boundary:

24 a. Please confirm that the corner of the customer's property is at the corner of
25 Principale Street and Concession Road 7. At Concession Road 7, Principale
26 Street transitions to St Albert. In addition Concession Road 7 transitions to
27 Aurele Road at Principale Street?

28 b. Other than through service area amendments (2 addresses prior to the interim
29 order) please confirm that Hydro One does not serve any addresses on
30 Principale Street?

1 **HOL 18.**

2

3 **Reference: Hydro One Submission dated 2022-09-09, page 2. Sub-bullets 3. A.**
4 **Hydro Ottawa's dispute of the Service Area Amendment Application -**
5 **September 2, 2022**

6

7 **Preamble:**

8

9 Please see Table 1 from Hydro Ottawa's dispute of the Service Area Amendment
10 Application - September 2, 2022

11

12

Table 1 - Estimated Monthly Bill Comparison¹

13

	Hydro Ottawa Estimated Per Month Charges	Hydro One Estimated Per Month Charges ²	Monthly Difference (negative represents lower Hydro Ottawa charges)	Revenue Horizon Difference (15 Years ³)
Distribution	\$7,488	\$25,312	(\$17,824)	(\$3,208,255)
Total Bill	\$48,961	\$67,548	(\$18,586)	(\$3,345,543)

14

15

Questions:

16

17 In reference to optimizing the existing distribution infrastructure:

18

a. As part of this application, does Hydro One submit that optimizing existing distribution infrastructure should be born on the customer requesting the

19

connection, regardless of the additional cost (including bill impact), when multiple options are available to connect?

20

21

¹ Analysis uses 2022 rates without temporary rates and charges with estimated load of 1,300 KW and 255,500 kWh.

² Hydro Ottawa has estimated what a Hydro One bill may be, however a calculation provided by Hydro One could result in a different amount.

³ Based on a simple calculation of the monthly amount multiplied by 12 months multiplied by 15 years.

- 1 b. Does Hydro One suggest that the OEB proposes that optimizing existing
2 distribution infrastructure should be borne by the customer requesting the
3 connection, regardless of the additional cost (including bill impact), when multiple
4 options are available to connect?
- 5 c. Does Hydro One suggest:
- 6 i. The customer is not taking on additional cost as a result of being served
7 by Hydro One, while residing in Hydro Ottawa's existing service territory
8 (prior to the Interim Order dated September 26, 2022)?
- 9 ii. Please explain how the bill impacts support the position in response to
10 sub part part i.

From: angela.yorgiadis@HydroOne.com [<mailto:angela.yorgiadis@HydroOne.com>]
Sent: June-27-16 3:00 PM
To: Malone, Casey
Cc: Van Dusen, Gregory; john.boldt@HydroOne.com
Subject: RE: Hydro Ottawa : New building - [REDACTED]

Hydro Ottawa Limited
EB-2022-0234
Interrogatories to Hydro One
ATTACHMENT 2(A)
October 28, 2022
Page 1 of 2

Hi Casey,

In response to your email below regarding the cost of connection and 25 year revenue, I'm confirming that we include this in our cost comparison analysis. Attached is a copy of the comparison for your review and perusal.

If you have any questions/clarifications, please give me a call and we can discuss further.

Thank you,
Angela

Angela Yorgiadis

Advisor, Program Integration, Dx Asset Management, R32
Hydro One Networks Inc.
Tel: (800) 419-5208 ext. 6216
or (905) 946-6216
Fax: (905) 946-6215
Email: angela.yorgiadis@HydroOne.com

From: Malone, Casey [<mailto:CaseyMalone@HydroOttawa.com>]
Sent: Wednesday, June 22, 2016 4:43 PM
To: BOLDT John
Cc: YORGIADIS Angela; Van Dusen, Gregory
Subject: RE: Hydro Ottawa : New building - [REDACTED]

John,

1. This application is just in HONI service territory by 20m.
2. For economic efficiency from a customer's view, is this:
 - a. the cost of connection; or
 - b. the cost of connection and 25 years revenue ?

Casey

From: john.boldt@HydroOne.com [<mailto:john.boldt@HydroOne.com>]
Sent: June-22-16 4:37 PM
To: Malone, Casey; angela.yorgiadis@HydroOne.com
Subject: Hydro Ottawa : New building - [REDACTED]

Casey,

Both of our utilities need to prepare an OTC.

To do this, the customer will have to request a connection from both of our companies. Once we receive the request, our field staff will prepare a detailed OTC that we can then compare to your OTC and who ever is most economically efficient will become the physical LDC.

Who's licensed territory is this in right now?

Angela, please work with Casey to have this completed.

thanks

John

From: Malone, Casey [<mailto:CaseyMalone@HydroOttawa.com>]
Sent: Monday, June 13, 2016 6:49 PM
To: BOLDT John
Subject: New building - [REDACTED]

John,

Another request for service along our boundary line.
Both HONI and HOL lie-along with primary on the pole line.

We should finish the economic efficiency process to assist staff.

Casey