



By RESS and Email

November 11, 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 Ottawa Limited Interrogatory Responses  
Ontario Energy Board File Number: EB-2022-0234  
Hydro One Networks Inc. Service Area Amendment Application**

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

On November 7, 2022 Hydro One submitted supplemental evidence with regard to the subject file. In the letter Hydro One noted "Hydro One is providing this information in advance of the interrogatory submission deadline such that the responses of either distributor and/or the OEB's assessment of the application are not prejudiced in any way." Hydro Ottawa disagrees with this statement and contends Hydro One has put Hydro Ottawa in a prejudicial position by not disclosing information Hydro One has had knowledge of for some time. Hydro Ottawa notes that all discussions related to the pole changes were subsequent to Hydro Ottawa's first inquiry about joint use of the poles. This compromised Hydro Ottawa's ability to effectively participate in related planning discussions and coordinate efforts.

In addition, Hydro One notes that "Hydro One is providing this correspondence as it has become clear during the development of responses to interrogatory questions posed by OEB Staff and Hydro Ottawa that there may be additional information that the OEB and/or Hydro Ottawa may find pertinent to this proceeding, specifically regarding works that have been requested along the same pole line that will require upgrading for Hydro Ottawa to execute its proposed connection to the Subject Area of this proceeding." Hydro Ottawa does not understand how, as part of routine operational work and during discussions with Hydro Ottawa, this pertinent information was not provided.



Given the timing of providing the supplemental evidence, less than four days prior to interrogatory responses being due, Hydro Ottawa has not been able to properly assess the supplemental evidence or consider how it would impact its interrogatory responses.

As the OEB and Hydro One are aware, Hydro Ottawa has requested the opportunity to submit interrogatories on the supplemental evidence provided by Hydro One.

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

Sincerely,

DocuSigned by:

*April Barrie*

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**April Barrie**

**Director, Regulatory Affairs**

**Directeur, Affaires réglementaires**

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Cc:

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