

1 **INTERROGATORY RESPONSE - HONI-1**

2 **Question-1**

3
4 **TOPIC**

5 Protecting the interests of the Customer

6
7 **REFERENCE**

- 8 1. Hydro Ottawa Conditions of Service –
9 [https://hydroottawa.com/sites/default/files/2021-11/FINAL-HOL-COS-V8-EN-Nov-](https://hydroottawa.com/sites/default/files/2021-11/FINAL-HOL-COS-V8-EN-Nov-22-2021.pdf)
10 [22-2021.pdf](https://hydroottawa.com/sites/default/files/2021-11/FINAL-HOL-COS-V8-EN-Nov-22-2021.pdf)
11
- 12 2. “It is unclear if the developer (Claudio Bertone) and the final customer (Ford Motor Company of
13 Canada, Limited) were aware that Hydro Ottawa could support the customer connection without
14 risk, through a temporary connection from Hydro One. Further, it is not clear if the final customer,
15 Ford Motor Company of Canada, Limited supports the SAA” – HOL Letter & Contested SAA,
16 Attachment 1, p. 3 – September 2, 2022.
17
- 18 3. “It is also unclear, when the developer supported the SAA, if the final customer responsible for
19 future electricity costs, was aware of the financial implication on their bills and the rate differential
20 between the two distributors”. – HOL Letter & Contested SAA, Attachment 1, p. 3 – September
21 2, 2022
22
- 23 4. August 26, 2022 Hydro Ottawa Offer to Connect 626 Principale Street – HOL Letter &
24 Contested SAA, Attachment F – September 2, 2022
25
- 26 5. “The customer did not formally request a connection from Hydro Ottawa. Hydro Ottawa and Hydro
27 One met with the customer on April 29, 2022 to explain the SAA process and subsequently Hydro
28 Ottawa requested project documentation. In follow-up to this meeting, the customer submitted
29 their documents to Hydro Ottawa on May 20, 2022 in order for Hydro Ottawa to prepare a
30 connection offer. This same date, Hydro Ottawa contacted the customer to confirm receipt of the
31 documents and discuss the information provided to incorporate into Hydro Ottawa’s connection

1 offer” – HOL Letter & Contested SAA, Attachment 1, p. 2 – September 2, 2022
2 Yes, the customer was provided an OTC on August 26, 2022. A copy is provided in the contested
3 SAA document, Attachment F. – HOL Letter & Contested SAA, Attachment 1, p. 2 – September
4 2, 2022

5 **INTERROGATORY**

6 a) Please confirm that Reference 1 is the appropriate link to the current Hydro Ottawa Conditions of
7 Service. If this is not the applicable version of the Hydro Ottawa Conditions of Service with respect
8 to the issues raised in this proceeding, please place the applicable Hydro Ottawa Conditions of
9 Service on the record of this proceeding.

10

11 b) Please confirm that the definition of Customer in the Hydro Ottawa Conditions of Service
12 remains as follows:

13

14 *“Customer” means a Person that has contracted for or intends to contract for Connection of*
15 *a Load or a Distributed Energy Resource. This includes developers of residential or*
16 *Commercial sub-divisions or Distributed Energy Resources.*

17

18 c) With respect to Reference 1, 2, and 3, please provide documentation regarding Hydro Ottawa’s
19 process for connecting distribution customers, specifically, the Hydro Ottawa customer
20 connection process that bypasses the Developer, the “Customer” as defined by Hydro Ottawa’s
21 Conditions of Service and contacts the final customer directly. In addressing this question, please
22 articulate how often Hydro Ottawa has sought approval from the final customer for a connection
23 process and where this approach is documented in the Hydro Ottawa Conditions of Service,
24 specifically, that a Developer must have concurrence or approval of all subsequent final
25 customers in order to define how the Developer will be connected.

26

27 d) With respect to Reference 4, please confirm that despite the evidence provided by Hydro
28 Ottawa on the record of this proceeding, including the monthly bill differences between the two
29 distributors, the Developer has not signed the HOL Offer to Connect nor has there been any
30 concerns expressed by the final customer.

- 1 e) With respect to Reference 5, please confirm that “customer” refers to the Developer, and all
2 instances whether customer is used in HOLs documentation it is referencing the Developer. If not,
3 please indicate by reference to the statement, where “customer” has some other meaning than
4 the Developer.
5
- 6 f) With respect to Reference 5 and 6, between April 2022 and August 26, 2022 did Hydro Ottawa
7 communicate to the Developer that it could meet the Developer’s connection date and if yes,
8 provide a copy of the communication.
9
- 10 g) With respect to Reference 2, please provide documentation supporting Hydro Ottawa’s efforts to
11 communicate to the Developer that Hydro Ottawa could support a customer connection by
12 October 2022, through a temporary connection with Hydro One. If no such communication was
13 provided to the Developer, provide specific details of what information Hydro Ottawa was missing
14 to make this determination, what steps Hydro Ottawa took to obtain the information, and when
15 the information was received (including dates and any documentation evidencing same) by Hydro
16 Ottawa.
17

18
19 **RESPONSE**

- 20 a) Hydro Ottawa confirms that Reference 1 is the appropriate link to the current Hydro Ottawa
21 Conditions of Service.
22
- 23 b) Hydro Ottawa confirms that the definition of Customer in the Hydro Ottawa Conditions of
24 Service remains as follows:
25 *“Customer” means a Person that has contracted for or intends to contract*
26 *for Connection of a Load or a Distributed Energy Resource. This includes*
27 *developers of residential or Commercial sub-divisions or Distributed Energy*
28 *Resources.*
29
- 30 c) As part of Hydro Ottawa’s evidence, including reference 2 and 3 above, Hydro Ottawa does not
31 purport nor did Hydro Ottawa intend to infer the Developer should be bypassed. Hydro Ottawa’s
32 evidence recognizes that there are two customers. The Developer and the final connected

1 Customer. That said, Hydro Ottawa strives to have direct contact with the connecting customer
2 prior to energization, where feasible. While not mandatory, Hydro Ottawa believes this approach
3 is the best path forward when starting a new customer relationship.

4
5 However, Hydro Ottawa cannot determine in Hydro One's evidence that two Customers are being
6 acknowledged. Specifically, Hydro One notes it has a Customer letter of support, without clearly
7 referencing which Customer the letter is from or that another Customer exists. "This Application
8 is supported by the Customer, as outlined in the Customer's Letter of Support included in
9 Attachment 1."¹ The Customer consenting is Claudio Bertone, the Vice President, Highway 417
10 Casselman LP. There is no evidence that the Ford company concurs or that Claudio Bertone has
11 been delegated such decisions by the Ford company.

12
13 This is not a typical customer connection, as customers normally do not reside at distributor
14 service territory boundaries nor do they usually have an option to express a preferred distributor.
15 As such, Hydro Ottawa believes it is important to be clear as to which Customer is being referred
16 to and their decision making authority.

17
18 The issue of developer and customer considerations were weighed in the OEB combined hearing
19 RP-2003-0044 in which the participants expressed concern that the end use customer may not
20 be properly considered, "Toronto Hydro argued that the interests of the individual customer must
21 not outweigh the other aspects of the public interest when the Board is considering a service area
22 amendment. Moreover the interests of the developer as a customer cannot outweigh the interests
23 of the end-use customer, who will ultimately be responsible for the rates resulting from the
24 developer's preferences. The LDC Coalition supported the position of Toronto Hydro."²

25
26 The OEB summarized this concern by stating "Some parties also expressed concerns that while
27 property owners or developers can control the destiny of end-use customers, that is, tenants or
28 home buyers, their interest may be different from this group. The developers' prime driver in
29 expressing a preference for one service provider over another may well be based on the
30 contribution in aid of construction costs, rather than the ongoing rate structure, which will affect

¹ Hydro One's SAA Application, page 2

² Combined Proceeding Decision, Para. 217 – February 27, 2004

1 the end user. End users, it is argued, may be prejudiced by developers or property managers
2 pursuing their immediate interest, at the risk of long term exposure to higher rates.”³

3
4 d) Hydro Ottawa confirms that the customer, Claudio Bertone, referred to as the Developer, has not
5 yet responded to or signed Hydro Ottawa’s Offer to Connect. Additionally, Hydro Ottawa is
6 unaware of a signed connection agreement between Hydro One and the Developer.

7
8 Hydro Ottawa noted in its application that we have not contacted the final connecting Customer
9 (Ford Motor Company of Canada, Limited) and subsequently Hydro Ottawa has not reached out
10 to the Developer frequently, as we were concerned the process could be causing confusion and
11 we did not wish to risk adding to that confusion.

12
13 e) Please see the quotes in reference 5 and 6 with clarification as to which Customer is being
14 referenced.

15
16 Reference 5 Quote:
17 ““The customer **[references the Developer or the final connecting Customer, either can**
18 **request a connection]** did not formally request a connection from Hydro Ottawa. Hydro Ottawa
19 and Hydro One met with the customer **[Developer, as arranged by Hydro One]** on April 29,
20 2022 to explain the SAA process and subsequently Hydro Ottawa requested project
21 documentation. In follow-up to this meeting, the customer **[Developer]** submitted their documents
22 to Hydro Ottawa on May 20, 2022 in order for Hydro Ottawa to prepare a connection offer. This
23 same date, Hydro Ottawa contacted the customer **[Developer]** to confirm receipt of the
24 documents and discuss the information provided to incorporate into Hydro Ottawa’s connection
25 offer.”

26
27 Reference 6 Quote:
28 “Yes, the customer **[Developer]** was provided an OTC on August 26, 2022. A copy is provided in
29 the contested SAA document, Attachment F.”

³ Combined Proceeding Decision, Para. 227 – February 27, 2004

1 f) Subsequent to Hydro One providing the confirmation of the Customer's contact information on
2 April 25, 2022 (requested by Hydro Ottawa throughout March 2022), Hydro One hosted a virtual
3 meeting with the Developer and Hydro Ottawa on April 29, 2022.

4
5 In this meeting, Hydro Ottawa confirmed with the Customer (Developer) the system expansion
6 required for Hydro Ottawa to service 626 Principale Street, Casselman would need to be
7 completed after, not prior to, the connection date of October, 2022. Hydro Ottawa advised Hydro
8 One to proceed with the temporary connection, while both parties had their respective SAA
9 applications reviewed by the OEB.

10
11 This discussion was documented in meeting minutes by Hydro One on May 2, 2022 and is shown
12 in Attachment 8 of Hydro One's SAA Application.

13
14 g) Please see response to (f) above which confirms Hydro Ottawa's plan to support the temporary
15 connection to 626 Principale Street, Casselman and when the Developer was informed of this
16 plan. As also mentioned in (f), on May 2, 2022, this plan was discussed and referenced in the
17 meeting minutes provided by Hydro One.

- 93 b)
- 94 i) Hydro Ottawa does not anticipate the requested work from Hydro One to take longer than
- 95 12 months.
- 96
- 97 ii) The Distribution System Code (DSC) language referenced refers to the equivalence of a
- 98 temporary long-term load transfer. Hydro Ottawa notes the temporary connection is not
- 99 set up as a temporary long-term load transfer. If it was, Hydro One should not be metering
- 100 and billing the customer.

101

102 As Hydro One is aware, the development at 626 Principale St., Casselman stretches over

103 both Hydro Ottawa and Hydro One's service territory. Although both Hydro Ottawa and

104 Hydro One, per the evidence, agree Hydro Ottawa is the incumbent distributor, Hydro

105 Ottawa's licence requires an amendment to confirm it could permanently serve the

106 customer. The customer did not provide the necessary evidence to start the SAA

107 Application until recently, as evidenced by the timing of both Hydro One and Hydro

108 Ottawa's offer to connect.

109

110 In addition, Hydro Ottawa does not believe the intent of the OEB's guideline related to

111 temporary connections was to drive the customer's timeline.

- 112
- 113 c) As noted in part a) Hydro One declined to communicate further on this file and as such Hydro
- 114 Ottawa could not advance this file.

Acting Manager, Internal Audit and ERM
Gestionnaire par intérim, Audit interne et GRE

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1 **INTERROGATORY RESPONSE - HONI-5**

2 **Question-5**

3
4 **TOPIC**

5 Need for Service Area Amendment

6
7 **REFERENCE**

- 8 1. "As noted above, Hydro Ottawa filed a 'Contested Service Area Amendment Application' in
9 response to Hydro One's Application. The OEB considers that document to be Hydro Ottawa's
10 dispute of the Hydro One Application. It would not be appropriate to treat it as an application in
11 its own right, because the subject property is already in the Hydro Ottawa service area.
12 Accordingly, the OEB has assigned a single file number to this proceeding." – Ontario Energy
13 Board Interim Order, pp. 3-4, October 7, 2022
- 14
- 15 2. "This application for a contested service area amendment ("SAA") addresses mainly the
16 preservation of Hydro Ottawa Ltd.'s ("Hydro Ottawa") service territory with an expansion of an
17 adjacent smaller property into Hydro One Networks Inc. ("Hydro One") service territory. This
18 application affects one (1) new General Service Customer. The customer is at 626 Principale
19 Street and lies along the south border of Hydro Ottawa's service territory, which also aligns with
20 the municipality of Casselman's south border. The border is defined by Concession Road 7. At
21 Concession Road 7, Principale Street transitions to St Albert Road, which marks where Hydro
22 Ottawa's service territory and the municipality of Casselman boundaries end to the south. The
23 additional property is to the east of Hydro Ottawa service territory, prior to the train tracks along
24 Concession Road 7." – HOL Letter & Contested SAA, Section 7.0 – September 2, 2022
- 25
- 26 3. "On June 8, 2021 Hydro Ottawa approached the customer confirming that a connection could be
27 made, requested a load summary and other documentation and notified the customer that the
28 property included Hydro One service territory and that Hydro Ottawa would discuss the
29 connection with Hydro One." – HOL Letter & Contested SAA, Section 7.0 – September 2, 2022

1 b) Was the supply information provided to the Developer on June 11, 2021 limited to the one-line
2 description on p. 2 of the SAA, or was there other information respecting the requirements for a
3 permanent connection? Please provide the information which was sent to the Developer.

4
5 c) Did either the Developer or the final customer respond to Hydro Ottawa?
6

7 d) What was the response to that information? Please provide.
8

9 **RESPONSE**

10
11 a) As of June 8, 2021, Hydro Ottawa understood the customer's final requirements to be an
12 estimated 3MW load facility (3000A at 80%) to be operating at a secondary voltage of 347/600V.
13

14 b) While Hydro Ottawa knew the customer's preliminary load requirements on June 8, 2021, Hydro
15 Ottawa was discussing possible servicing options such as 2x1000kW Hydro Ottawa owned
16 transformers into a customer double ended switchboard. Through further discussions, Hydro
17 Ottawa confirmed with the contact at the time (Leeswood Construction) on June 11, 2021
18 servicing through a 3000kW customer owned transformer could be supported. In addition to the
19 line in the reference, Hydro Ottawa also informed the customer that we were in discussion with
20 Hydro One. Please see Attachment HONI-8(A): Email Hydro at 626 Principal.
21

22 c) The contact at the time (Leeswood Construction) responded thanking Hydro Ottawa for the
23 information on June 11, 2021. Please see part d) for related emails.
24

25 d) Please see part c). In addition, please refer to the following two attached emails:

26 Attachment HONI-8(B): Email Hydro at 626 Principal -Leeswood Response-1

27 Attachment HONI-8(C): Email Hydro at 626 Principal -Leeswood Response-2

----- Forwarded message -----

From: **Preston, Ken** <kenpreston@hydroottawa.com>

Date: Fri, Jun 11, 2021 at 1:09 PM

Subject: Re: [EXTERNAL] hdyro at 626 Principal, Casselman

To: Kelly Woroniuk <kworoniuk@leeswood.ca>

Cc: Domenic Fabiano <dfabiano@leeswood.ca>, steve.zeitler@ddmac.ca <steve.zeitler@ddmac.ca>, Christopher Murphy <christophermurphy@hydroottawa.com>

Kelly,

We are confirming Hydro Ottawa can supply a customer owned transformation upto a 3000 amp 347/600 volt 80 % rated service on a radial feed.

Please note we are still in discussions with Hydro One

regards

Ken

On Thu, Jun 10, 2021 at 11:57 AM Kelly Woroniuk <kworoniuk@leeswood.ca> wrote:

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From: **Kelly Woroniuk** <kworoniuk@leeswood.ca>

Date: Fri, Jun 11, 2021 at 1:15 PM

Subject: Re: [EXTERNAL] hdyro at 626 Principal, Casselman

To: Preston, Ken <kenpreston@hydroottawa.com>

Cc: Domenic Fabiano <dfabiano@leeswood.ca>, steve.zeitler@ddmac.ca <steve.zeitler@ddmac.ca>, Christopher Murphy <christophermurphy@hydroottawa.com>

Thank you Ken

Kelly Woroniuk
V.P. Estimating & Sales

Leeswood Construction

Office: (416) 309-4482 ext. 517

Cell: (416) 527-2664

Email: kworoniuk@leeswood.ca

On Jun 11, 2021, at 1:09 PM, Preston, Ken <kenpreston@hydroottawa.com> wrote:

Kelly,

We are confirming Hydro Ottawa can supply a customer owned transformation upto a 3000 amp 347/600 volt 80 % rated service on a radial feed.

Please note we are still in discussions with Hydro One

regards

Ken

On Thu, Jun 10, 2021 at 11:57 AM Kelly Woroniuk <kworoniuk@leeswood.ca> wrote:

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Date: Fri, Jun 11, 2021 at 1:27 PM
Subject: RE: [EXTERNAL] hdyro at 626 Principal, Casselman
To: Preston, Ken <kenpreston@hydroottawa.com>, Kelly Woroniuk <kworoniuk@leeswood.ca>
Cc: steve.zeitler@ddmac.ca <steve.zeitler@ddmac.ca>, Christopher Murphy <christophermurphy@hydroottawa.com>

Excellent news Ken, keep us posted on discussions with HO.

Domenic Fabiano
Senior Vice-President/ Partner
Vice-président/ Partenaire



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From: Preston, Ken <kenpreston@hydroottawa.com>
Sent: June 11, 2021 1:09 PM
To: Kelly Woroniuk <kworoniuk@Leeswood.ca>
Cc: Domenic Fabiano <dfabiano@leeswood.ca>; steve.zeitler@ddmac.ca; Christopher Murphy <christophermurphy@hydroottawa.com>
Subject: Re: [EXTERNAL] hdyro at 626 Principal, Casselman

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