

INTERROGATORY RESPONSE - HONI-1**Question-1****TOPIC**

Protecting the interests of the Customer

REFERENCE

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

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

INTERROGATORY

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

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

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

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

d) With respect to Reference 4, please confirm that despite the evidence provided by Hydro Ottawa on the record of this proceeding, including the monthly bill differences between the two distributors, the Developer has not signed the HOL Offer to Connect nor has there been any 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 **RESPONSE**

- 19
- 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.

INTERROGATORY RESPONSE - HONI-2**Question-2****TOPIC**

Connection Schedule

REFERENCE

1. August 26, 2022 Hydro Ottawa Offer to Connect 626 Principale Street – HOL Letter & Contested SAA, Attachment F – September 2, 2022
2. “The customer’s response also suggests that obtaining a timely connection in October, 2022 may have been a factor in their decision to support Hydro One’s SAA”. – HOL Letter & Contested SAA, Attachment 1, p. 3 – September 2, 2022
3. “With reference to EB-2015-0006 amending the distribution system code, the OEB confirmed that ‘temporary arrangements (under 12 months) that were necessary to accommodate construction projects would not be considered as load transfers under the DSC. However, the arrangements must be temporary in nature (less than 12 months) and necessary only to ensure continuity of service to customers during construction projects. They cannot be long-term or permanent and they cannot be used by a geographic distributor in order to expand its system to connect customers.’¹ Hydro Ottawa’s ability to service this customer in less than 12 months of the temporary connection satisfies the OEB’s requirement;” – HOL Letter & Contested SAA, Attachment 1, p. 3 – September 2, 2022
4. “November 2, 2021 Hydro One confirmed a temporary service had been provided to the customer”. – HOL Letter & Contested SAA, Section 7.0, p. 3 – September 2, 2022
5. “June 28, 2022 Hydro Ottawa Email to Hydro One - Hydro Ottawa has received the site’s drawings from the developer and currently, is in the process of reaching out to HONI Dx to get the estimated cost of pole line upgrade to bring the feeder line (from Leflech Blvd and Principale St) to the Developer site. Kevin is trying to reach out to Mike B (? Kevin can you please confirm the name

of the Hydro One person) from Hydro One to get the high-level estimate. Action Item: Chris / Kevin to confirm if they need Jayde / Dhaval to help expedite the discussion with Mike B. Chris confirmed that Hydro Ottawa is looking for high level estimate numbers and not detail estimate in order to avoid cost and resource timing spent on both sides". – Hydro One Service Area Amendment Application, Attachment 10 – August 18, 2022

6. "The connection costs are currently estimated to be \$700,000 for system expansion and \$15,000 for connection assets. The customer will only be responsible for the \$15,000 in connection costs as the future revenue is forecast to more than offset the expansion costs. – HOL Letter & Contested SAA, Section 7.2.1 (c)" – September 2, 2022

INTERROGATORY

- a) Hydro Ottawa has not provided a physical connection date at Reference 1 nor is there any date identified on the record as to when Hydro Ottawa can physically serve the Customer. Given Hydro One's ability to meet the Customer's preference of an October connection date, as provided at Reference 2, please provide the date that Hydro Ottawa can physically serve 626 Principale Street. In so doing, please provide a detailed schedule that outlines all necessary milestones that must be accomplished for Hydro Ottawa to meet that date. Please include all anticipated dates of receiving permits and permitting applications, designs, constructions milestones, etc.
- b) Contingent on Hydro Ottawa's response to part a), and in consideration of Hydro Ottawa's evidence provided at Reference 3 and 4, please explain how Hydro Ottawa's proposed connection is consistent with:
- i) the timelines defined in the referenced long term load transfer elimination DSC amendments that a temporary construction connection should not exceed 12 months, and
 - ii) the language in the DSC that outlines that temporary construction connection *cannot be long-term or permanent and they cannot be used by a geographic distributor in order to expand its system to connect customers*
- c) At Reference 5, it is documented that Hydro Ottawa's design and estimate is underpinned by a

high-level estimate and not detailed in order to avoid cost and resourcing in developing the estimate. Aside from contesting Hydro One's service area amendment application, please provide any update or steps Hydro Ottawa has taken with respect to the design and estimate for Hydro Ottawa's proposal to update the accuracy of the design/estimate and to advance the viability of an expedited connection for the Customer.

RESPONSE

- a) With the proposed connection, Hydro Ottawa would utilize Hydro One poles to connect the customer to Hydro Ottawa's system. In order to facilitate Hydro Ottawa's lines, Hydro One poles require a pole line upgrade. The pole upgrade is the vast majority of the work. Hydro Ottawa inquired about information for connecting the customer such as the supply point pole from Hydro One on August 23, 2022. On August 24, 2022, Hydro One replied they would not confirm nor provide further information related to the SAA Application, see Attachment HONI-2(A): 626 Principale St - HONI Service Plans and below.

"Unfortunately, I won't be able to confirm or provide information since we have already filed the SAA application at the OEB. Also, since the application has been already submitted, I understand that the correct process to exchange the information is through the OEB IR process. This will be appropriate method to correctly capture all communication formally and on record."

Hydro Ottawa respected Hydro One's position that they would no longer directly communicate outside the SAA Application process, even though Hydro Ottawa disagreed with Hydro One's position and it created inefficiencies in the connection process, especially given Hydro One had requested no hearing. As a result of Hydro One suspending further communication, the date which Hydro Ottawa can connect the customer is not yet known as the schedule for construction will be reliant on Hydro One to complete their pole upgrade and this schedule has not been provided.

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.

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

From: **PATEL Dhaval** <Dhaval.Patel@hydroone.com>

Date: Wed, Aug 24, 2022 at 4:16 PM

Subject: [VERIFIED] RE: [626 Principale St, Casselman](#) HONI Service Plans

To: Murphy, Christopher <christophermurphy@hydroottawa.com>

Cc: Laurie Elliott <laurieelliott@hydroottawa.com>, April Barrie <aprilbarrie@hydroottawa.com>, SULEMAN Jayde <Jayde.Suleman@hydroone.com>, Kevin Perez-Lau <kevinperez-lau@hydroottawa.com>, FLANNERY Andrew <Andrew.Flannery@hydroone.com>, KUMAR Gaurav <Gaurav.Kumar@hydroone.com>, CATALANO Pasquale <Pasquale.Catalano@hydroone.com>, CIUFO Mark <Mark.Ciufo@hydroone.com>

Good Afternoon Chris,

Unfortunately, I won't be able to confirm or provide information since we have already filed the SAA application at the OEB. Also, since the application has been already submitted, I understand that the correct process to exchange the information is through the OEB IR process. This will be appropriate method to correctly capture all communication formally and on record.

Thanks,

Dhaval Patel, P.Eng.

Sr. Network Mgmt. Officer (Dx Rationalization)

Dx Investment Planning, Dx Asset Management

Hydro One Networks Inc.

Tel: (647)638 1606

Email: dhaval.patel@hydroone.com

From: Murphy, Christopher <christophermurphy@hydroottawa.com>

Sent: Tuesday, August 23, 2022 12:27 PM

To: PATEL Dhaval <Dhaval.Patel@HydroOne.com>

Cc: Laurie Elliott <laurieelliott@hydroottawa.com>; April Barrie <aprilbarrie@hydroottawa.com>; SULEMAN Jayde <Jayde.Suleman@HydroOne.com>; Kevin Perez-Lau <kevinperez-lau@hydroottawa.com>; FLANNERY Andrew <Andrew.Flannery@HydroOne.com>

Subject: [626 Principale St, Casselman](#) HONI Service Plans

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Hi Dhaval,

I am looking to confirm HONI's service plans for this site to ensure HOL understands the assets involved and whether any transfers would be required if the OEB deemed HOL to be the servicing LDC.

Are you able to confirm whether HONI is looking to utilize the pole in the right of way numbered 20865 in the north east corner of the intersection Principale @ Route/Aurele for the overhead to underground dip once the bank of transformers has been

removed or is there an alternative pole planned to be installed/used? Additionally, could you please confirm the ownership of the cable dip / underground cable being owned by HONI or the customer?

I appreciate your assistance.

Thanks,

Chris Murphy

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

christophermurphy@hydroottawa.com
Tel./tél.: 613 738-5499 | ext./poste 7114
Cell.: 613 868-1548

Hydro Ottawa Limited / Hydro Ottawa limitée
[2711 Hunt Club Road](#), PO Box 8700/chemin Hunt Club, C.P. 8700
Ottawa, Ontario K1G 3S4

hydroottawa.com

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INTERROGATORY RESPONSE - HONI-3

Question-3

TOPIC

Economic Efficiency

REFERENCE

1. Hydro One Submissions on Contested Hearing, Attachment 2 – September 9, 2022
2. “Hydro Ottawa has no current expansion plans for lands adjacent to the area that is the subject of the SAA application”. – HOL Letter & Contested SAA, Section 7.6 – September 2, 2022
3. “Similarly, proposals to align service areas with municipal boundaries are ill considered unless the proponent can provide concrete evidence that the extended area is needed to provide service to actual customers in the area using assets and capacity in a manner that optimizes existing distribution assets and does not prejudice existing customers of the utility. Amendments need to be anchored by real customers, with an economic case for the extension that is convincing.” – RP-2003-0044 – Combined Proceeding Decision, Para. 241 – February 27, 2004
4. “The Municipality of Casselman has announced that it is in the process of proposing a Community Improvement Plan for the area south of highway 417, as a result the pole upgrades are likely to support this initiative and will provide Hydro One an opportunity to size the pole for a third circuit should it be needed to support future growth. Additionally, the pole line upgrade will provide Hydro Ottawa the opportunity to continue providing service to future customers within its service territory” – HOL Letter & Contested SAA, Section 7.2 – September 2, 2022
5. “While not currently forecasted, the expanded system will enable Hydro Ottawa to achieve more economic service growth in adjacent areas, as compared to the infrastructure Hydro Ottawa currently has”. – HOL Letter & Contested SAA, Section 7.2.1 (g) – September 2, 2022

- 1
- 2 6. "Casselman F4 has being used as a comparable area" – HOL Letter & Contested SAA, Section
- 3 7.5.7 – September 2, 2022
- 4

5 **INTERROGATORY**

- 6 a) As identified in Reference 1, please confirm that Hydro Ottawa has no customers and/or facilities
- 7 south of Highway 417. If this assumption is incorrect, please identify where these facilities and
- 8 customers are and their relative distance to the Subject Area of this Application.
- 9
- 10 b) Please confirm, as per Reference 2, that Hydro Ottawa has no intention of expanding into areas
- 11 adjacent to the Subject Area and all customers identified in Reference 1 will remain Hydro One
- 12 customers if the Subject Area is served by Hydro Ottawa.
- 13
- 14 c) In light of the Board's direction, provided at Reference 3, please elaborate on the relevance of
- 15 Reference 4. In other words, are there any real or actual customers identified in the Community
- 16 Improvement Plan? At what stage of the municipal approval urban planning process is the
- 17 Community Improvement Plan and when will the Community Improvement Plan be finalized?
- 18
- 19 d) At Reference 4, Hydro Ottawa documents that the pole upgrades required for Hydro Ottawa to
- 20 service 626 Principale Street will also *provide Hydro One an opportunity to size the pole for a third*
- 21 *circuit should it be needed to support future growth*. In Hydro Ottawa's opinion, what type of circuit
- 22 would Hydro One be adding to support "future growth" and explain what evidence is being relied
- 23 on to inform the opinion?
- 24
- 25 e) With respect to Reference 5, please clarify what adjacent areas Hydro Ottawa is referring to and
- 26 include any mapping of the adjacent areas? Please confirm that the service growth in Reference
- 27 5, is speculative, and has not been forecast? How would the adjacent areas which have not been
- 28 forecast be served with the current infrastructure?
- 29
- 30 f) How should the OEB consider the unforecast areas documented in Reference 5 in light of Hydro
- 31 Ottawa's existing infrastructure south of Highway 417 documented in Reference 1?

g) Please provide a map that identifies the relative proximity of the Casselman F4 to the Subject Area and the Casselman F1. Please provide the relative length of both feeders now, and after the proposed expansion of the Casselman F1.

h) Please provide a copy of the most recent Hydro Ottawa Distribution System Plan and identify any planned investments associated with Casselman DS and the reason for those investments, if any.

RESPONSE

a) Hydro Ottawa's Casselman service territory is approximately 5,347,134m². Hydro Ottawa's service territory south of Highway 417 in Casselman is approximately 469,763m², or around 9% of Hydro Ottawa's Casselman service territory. Furthermore, the Subject Area is approximately 120,500m², or around 2.3% of Hydro Ottawa's Casselman service territory which is significant for a single development. The Subject Area is also expected to have a monthly peak of 1,300kW, which, once the load has been realized, is anticipated to represent approximately 15% of Hydro Ottawa's electrical demand within Hydro Ottawa's Casselman service territory.

Hydro Ottawa has multiple customers north of Hydro Ottawa's territory boundary of Concession Road 7, however, Hydro Ottawa no longer has customers or facilities south of Highway 417 in Casselman, Ontario. As noted above, Hydro Ottawa's service territory south of Highway 417 accounts for nearly 10% of the service territory Hydro Ottawa purchased from the Municipality of Casselman.

Please see Attachment HONI-3(A): Development Google Screen Capture for a picture of the site in question while being developed.

b) As stated, Hydro Ottawa has no current plans for lands adjacent to the area that is the subject of the SAA application. Per Hydro Ottawa's evidence, the adjacent land is going through a proposed Community Improvement Plan. Details of the plan are unknown, including if the existing properties in Reference 1 will remain. Should that be the case, for the properties within Hydro One's service territory, Hydro One will no longer be required to provide any billing credits to those

1 customers as a result of Hydro One's rates being higher than Hydro Ottawa's at the time these
2 customers were transferred as part of the LTLT process.

3
4 c) The Community Improvement Plan was adopted by the Village of Casselman on August 11, 2022.
5 At this time Hydro Ottawa is not aware of any further details including potential customers.

6
7 d) Hydro Ottawa highlights that Hydro One could benefit from the pole upgrade should they desire
8 to future-proof for future growth. This would be subject to Hydro One's system planning and
9 growth plans for the area. Hydro Ottawa understands that Hydro One owns both 8.32kV and 44kV
10 overhead circuits and would expect one of those voltages to be extended should it support their
11 plans. Please see response to interrogatory HONI-7 part a) ii) Attachment (E) where Hydro One
12 considered expanding the 44kV.

13
14 In addition, on August 24, 2022 Hydro One informed Hydro Ottawa that Hydro One would not
15 confirm nor provide further information related to the SAA Application, see response to HONI-2
16 part a) Attachment (A): for the quote and related email.

17
18 e) The area referred to in reference 5 is Hydro Ottawa's service territory south of the Highway 417
19 shown in Attachment C of Hydro Ottawa's dispute of the Service Area Amendment Application -
20 September 2, 2022. No customer has currently approached Hydro Ottawa to service this land. As
21 with many developments, these properties would require Hydro Ottawa to complete a system
22 expansion to service the property with current infrastructure.

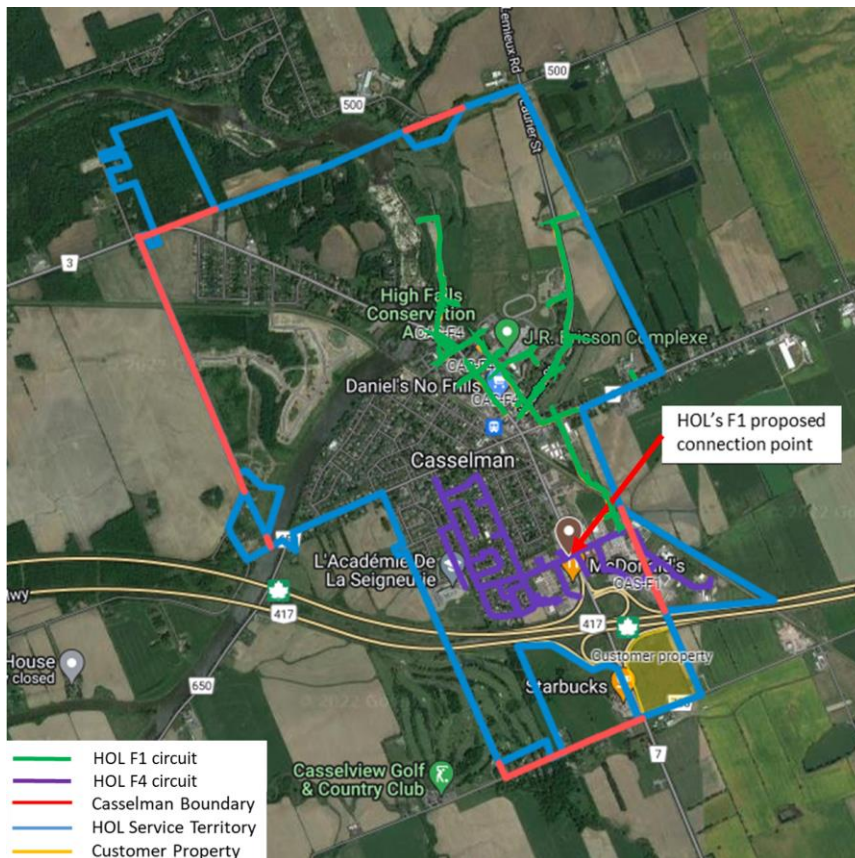
23
24 f) Casselman has seen a reduction of load through Conservation and Demand Management
25 ("CDM") initiatives in the last decade and limited growth in recent years. As a result, Hydro Ottawa
26 has not achieved better utilization of its assets. Hydro Ottawa's Casselman service territory south
27 of Highway 417 and prior to where Principale Street transitions to St Albert at Concession Road
28 7, where Hydro One's service territory starts, is where growth is occurring. As such, Hydro Ottawa
29 suggests the OEB considers the economic impact of refraining Hydro Ottawa from serving the
30 customers that are driving the limited growth that is occurring in its expanded service territory
31 which was acquired through the purchase of Hydro Casselman Inc from the Corporation of the
32 Village of Casselman.

g) Hydro Ottawa's Casselman F4 circuit is not proposed to be expanded, but rather Hydro Ottawa's F1 circuit. Hydro Ottawa's Casselman F1 circuit's closest location and proposed connection point can be seen in the map below in reference to the Subject Area (Customer Property).

Hydro Ottawa's Casselman F4 circuit (noted in orange below) is currently 2,303m and will not be expanded to support the customer connection. Hydro Ottawa's Casselman F1 circuit (noted in purple below) is currently 1,420m and will be approximately 2,270m after the proposed expansion. An exact distance is not known as Hydro One indicated (as shown in Attachment HONI-3(B): 626 Principale St, Casselman HONI Service Plans) on August 24, 2022 that they could not confirm or provide the information requested by Hydro Ottawa on August 23, 2022, pertaining to the servicing of the customer, due to their associated Service Area Amendment Application submission. Please refer to the map submitted in Attachment 5 of Hydro One's SAA Application.

While Hydro Ottawa's expansion plan is to go along the existing Hydro One pole line which would require an upgrade, Hydro Ottawa would also be able to construct a separate pole line along the east side of Principale Street. While this would not be the preferable option, it could be done for a comparable price to the estimate provided by Hydro One, should Hydro One not be able to accommodate Hydro Ottawa's system expansion on their pole line.

1



2

3

4 h) Hydro Ottawa has provided its most recent 2021-2025 Distribution System Plan as a separate
5 attachment, Attachment HONI-3(C): 2021 - 2025 HOL Distribution System Plan.

6

7 In the 2021-2025 Rate Application submission, the following projects for the Casselman were
8 included:

9

- Additional feeder at Casselman DS: a fourth feeder was added at the station to enable full restoration in an N-1 station bus fault scenario impacting reliability in the area. This project was completed in 2020.
- Installation of an Online Dissolved Gas Analysis (ODGA) unit on the Casselman T2 transformer in order to monitor transformer condition remotely. The project was part of a 2021-2025 station enhancement program. The installation of the ODGA unit is not yet completed.

10

11

12

13

14

15

Google Screen Capture of development at 626 Principale St, Casselman



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

From: **PATEL Dhaval** <Dhaval.Patel@hydroone.com>

Date: Wed, Aug 24, 2022 at 4:16 PM

Subject: [VERIFIED] RE: [626 Principale St, Casselman](#) HONI Service Plans

To: Murphy, Christopher <christophermurphy@hydroottawa.com>

Cc: Laurie Elliott <laurieelliott@hydroottawa.com>, April Barrie <aprilbarrie@hydroottawa.com>, SULEMAN Jayde <Jayde.Suleman@hydroone.com>, Kevin Perez-Lau <kevinperez-lau@hydroottawa.com>, FLANNERY Andrew <Andrew.Flannery@hydroone.com>, KUMAR Gaurav <Gaurav.Kumar@hydroone.com>, CATALANO Pasquale <Pasquale.Catalano@hydroone.com>, CIUFO Mark <Mark.Ciufo@hydroone.com>

Good Afternoon Chris,

Unfortunately, I won't be able to confirm or provide information since we have already filed the SAA application at the OEB. Also, since the application has been already submitted, I understand that the correct process to exchange the information is through the OEB IR process. This will be appropriate method to correctly capture all communication formally and on record.

Thanks,

Dhaval Patel, P.Eng.

Sr. Network Mgmt. Officer (Dx Rationalization)

Dx Investment Planning, Dx Asset Management

Hydro One Networks Inc.

Tel: (647)638 1606

Email: dhaval.patel@hydroone.com

From: Murphy, Christopher <christophermurphy@hydroottawa.com>

Sent: Tuesday, August 23, 2022 12:27 PM

To: PATEL Dhaval <Dhaval.Patel@HydroOne.com>

Cc: Laurie Elliott <laurieelliott@hydroottawa.com>; April Barrie <aprilbarrie@hydroottawa.com>; SULEMAN Jayde <Jayde.Suleman@HydroOne.com>; Kevin Perez-Lau <kevinperez-lau@hydroottawa.com>; FLANNERY Andrew <Andrew.Flannery@HydroOne.com>

Subject: [626 Principale St, Casselman](#) HONI Service Plans

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Hi Dhaval,

I am looking to confirm HONI's service plans for this site to ensure HOL understands the assets involved and whether any transfers would be required if the OEB deemed HOL to be the servicing LDC.

Are you able to confirm whether HONI is looking to utilize the pole in the right of way numbered 20865 in the north east corner of the intersection Principale @ Route/Aurele for the overhead to underground dip once the bank of transformers has been

removed or is there an alternative pole planned to be installed/used? Additionally, could you please confirm the ownership of the cable dip / underground cable being owned by HONI or the customer?

I appreciate your assistance.

Thanks,

Chris Murphy

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

christophermurphy@hydroottawa.com
Tel./tél.: 613 738-5499 | ext./poste 7114
Cell.: 613 868-1548

Hydro Ottawa Limited / Hydro Ottawa limitée
[2711 Hunt Club Road](#), PO Box 8700/chemin Hunt Club, C.P. 8700
Ottawa, Ontario K1G 3S4

hydroottawa.com

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INTERROGATORY RESPONSE - HONI-4**Question-4****TOPIC**

Rates

REFERENCE

1. "The Board does not believe that significant weight should be put on differences in current distribution rates even though current rates may be a significant factor in determining customer preference. In fact current rates, insofar as they are not a predictor of future rates, may misinform customer preference." Combined Proceeding Decision, Para. 86 – February 27, 2004
2. "Table 1, below provides Hydro Ottawa's estimate of a monthly bill from both utilities. As presented, it is estimated that if the customer is served by Hydro Ottawa they will save approximately \$18.6k per month (or \$223k per year). This translates to \$3.4M less in bill costs over the revenue horizon, of which \$3.2M relates to distribution alone". – HOL Letter & Contested SAA, Attachment 1, p. 3 – September 2, 2022
3. "The Municipality of Casselman has announced that it is in the process of proposing a Community Improvement Plan for the area south of highway 417, as a result the pole upgrades are likely to support this initiative and will provide Hydro One an opportunity to size the pole for a third circuit should it be needed to support future growth. Additionally, the pole line upgrade will provide Hydro Ottawa the opportunity to continue providing service to future customers within its service territory". – HOL Letter & Contested SAA, Section 7.2 – September 2, 2022

INTERROGATORY

- a) Please clarify why HOL believes the OEB should give the estimated rate differences in this contested SAA more weight than established in the Combined Proceeding provided at Reference 1?
- b) Please provide all assumptions that underpin the estimates that are documented at Reference

2, e.g., will the Customer remain in their current Hydro Ottawa and Hydro One rate classes for the entire revenue horizon?

c) Please recalculate the differences in rates based on all the same assumptions used in part b above except with the Customer being charged Hydro One's Sub Transmission Rate Class.

d) Please clarify what would happen if the final customer's load does not materialize as contemplated in the assumptions put forward by Hydro Ottawa. Given the long break - even point for Hydro Ottawa, please explain what happens if the final customer ceases operations after a period of either i) 5 years or ii) 10 years. What are the implications to the Developer and Hydro Ottawa customers?

RESPONSE

a) Hydro Ottawa has not indicated that it believes the OEB should give the estimated rate differences in this contested SAA more weight than established in the Combined Proceeding provided at Reference 1.

The Board however does indicate some weight should be given. As such, Hydro Ottawa has presented the rate difference.

b) Please see OEB Staff-2.

c) Per Hydro One current rate orders, for the Sub Transmission rate class:

This classification applies to either:

- Embedded supply to Local Distribution Companies (LDCs). "Embedded" meaning receiving supply via Hydro One Distribution assets, and where Hydro One is the host distributor to the embedded LDC. Situations where the LDC is supplied via Specific Facilities are included; OR
- Load which:
 - is three-phase;

- is directly connected to and supplied from Hydro One Distribution assets between 44 kV and 13.8 kV inclusive; the meaning of "directly includes Hydro One not owning the local transformation; and
- is greater than 500 kW (monthly measured maximum demand averaged over the most recent calendar year or whose forecasted monthly average demand over twelve consecutive months is greater than 500 kW).

Per Hydro One's SAA Application, section 7.1.4 (f) and Attachment 5, the proposed customer connection is using the Casselman DS F1 8.32 kV feeder.

Hydro One has requested Hydro Ottawa to calculate a "what if" scenario that requires the customer to be connected in a different manner than what has been presented in the offer to connect to the customer in Section C under Customer's Rate Class. There has been no indication in the SAA Application that such a connection is contemplated. Should this be a contemplated end state connection for the customer, Hydro One should have provided this detail, as well as the additional cost for such a connection as part of the SAA Application.

Furthermore, in order to connect the customer to Hydro One's 44 kV system, to facilitate the sub transmission classification, it is Hydro Ottawa's understanding that the pole line that goes south on Principale Street to the customer's property at 626 Principale, Casselman would need to be upgraded. The expansion of Hydro One's 44 kV system would require additional poles to be upgraded and would be a longer expansion compared to Hydro Ottawa's request to extend Hydro Ottawa's 8.32 kV system.

Given the proposed connection within the SAA Application is not for Hydro One's Sub Transmission connection and the current connection does not meet the requirements of Hydro One's Sub Transmission Rate Class, Hydro Ottawa has not provided the requested calculation.

- d) As a way of introduction, Hydro Ottawa uses a conservative method when calculating an economic evaluation versus the service load requested by customers. For the Customer at 626 Principale, Hydro Ottawa has used 1300 kW as part of the economic evaluation calculation. This is based on the estimated load profile provided by the customer to Hydro One, which was

1 subsequently shared with Hydro Ottawa and is a reflection of the estimated load rather than
2 service connection (3000 kW).

3
4 Based on the economic evaluation Hydro Ottawa would receive a payback on the asset
5 investment part way through the 13th year (which is less than the 15 year connection horizon and
6 significantly less than the useful asset life). The customer can see a decrease in their average
7 load of approximately 100 kW or 7.7 % prior to experiencing any requirement for capital
8 contribution to offset the cost of the expansion assets over the 15 year revenue horizon.
9 Additionally, given the Customer's requested service size of 3000 kW, Hydro Ottawa anticipates
10 increased load usage in the future. If this additional load above what Hydro Ottawa has forecasted
11 in the economic evaluation materializes, Hydro Ottawa's customers will see further benefits.

12
13 Hydro Ottawa wishes to convey it does not agree with Hydro One's characterization of the break-
14 even point being long as it is within the 15 year revenue horizon as set out for commercial
15 customers within the Ontario Energy Board's Distribution System Code. Additionally, Hydro
16 Ottawa has not had recent experience where customers requiring a system expansion cease
17 operation within the revenue horizon. Hydro Ottawa sees the likelihood of this as minimal risk,
18 and if it did occur, Hydro Ottawa is confident a new customer would operate on the lands due to
19 Casselman's community improvement plan and the non-unique nature of the site.

20
21 After 5 years, there is no implication on the Developer.

22
23 Prior to 5 years, there would be no impact on Hydro Ottawa customers. After 5 years, other Hydro
24 Ottawa customers could pay the residual value of the expansion should another customer not
25 utilize the site or expansion work.

INTERROGATORY RESPONSE - HONI-5**Question-5****TOPIC**

Need for Service Area Amendment

REFERENCE

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

- 1 4. Description of Proposed Service Area – HOL Letter & Contested SAA, Section 7.1.3 –
2 September 2, 2022
3

4 **INTERROGATORY**

- 5 a) Please confirm whether Hydro Ottawa agrees with the extract of the OEB's interim order, provided
6 as Reference 1, that the subject property is already in the Hydro Ottawa service area. In providing
7 this confirmation, please consider Reference 2 and 3 of Hydro Ottawa's evidence in this
8 proceeding.
9
10 b) Please confirm that the Subject Area provided in Reference 4 does not currently entirely fall
11 within the service territory of Hydro Ottawa.
12

13
14 **RESPONSE**

- 15 a) Hydro Ottawa believes its evidence should be treated as an Application. Although the larger
16 portion of the property, including the service point, resides within Hydro Ottawa's service territory,
17 a portion of the development resides within Hydro One's service territory.
18
19 b) Hydro Ottawa confirms that the description of the proposed service area in Section 7.1.3 of Hydro
20 Ottawa's disputed Hydro One SAA does not currently fall entirely within the service territory of
21 Hydro Ottawa. This is acknowledged by Hydro Ottawa's evidence and shown in reference 3 to
22 this interrogatory. The service point, as well as a majority of the development, resides within
23 Hydro Ottawa's service territory.

INTERROGATORY RESPONSE - HONI-6

Question-6

TOPIC

Comparison of OTC

REFERENCE

1. "An additional capital contribution in the amount of \$16,950 and a performance security per section 7 in the amount of \$791,000 for Hydro Ottawa's work as set out in section 1 and Appendix A." – HOL Letter & Contested SAA, Attachment F. Section 6.1 – September 2, 2022
2. "The connection costs are currently estimated to be \$700,000 for system expansion and \$15,000 for connection assets. The customer will only be responsible for the \$15,000 in connection costs as the future revenue is forecast to more than offset the expansion costs". – HOL Letter & Contested SAA, Section 7.2.1(c) – September 2, 2022
3. "Once the facilities are energized and subject to sections 3.2.22 and 3.2.24, the distributor shall annually return the percentage of the expansion deposit in proportion to the actual connections (for residential developments) or actual demand (for commercial and industrial developments) that materialized in that year (i.e., if twenty percent of the forecasted connections or demand materialized in that year, then the distributor shall return to the customer twenty percent of the expansion deposit). This annual calculation shall only be done for the duration of the five-year customer connection horizon. **If at the end of the customer connection horizon the forecasted connections (for residential developments) or forecasted demand (for commercial and industrial developments) have not materialized, the distributor shall be allowed to retain the remaining portion of the expansion deposit**" (emphasis added). Distribution System Code, Section 3.2.23.

INTERROGATORY

- a) With respect to Reference 1, what does Hydro Ottawa mean by "An additional capital contribution"?

b) Please confirm that the Developer will need to pay the performance security of \$791,000 documented in Reference 2. Furthermore, please confirm that the Developer may be required to pay interest (at rates which are increasing) and any other banking costs associated with a letter of credit needed for this purpose until the load forecast is fulfilled. Please opine on why it is in the best interest of the Developer (the connecting Customer) to add this additional financial burden vis-à-vis Hydro One's comparative cost?

c) With respect to References 2 and 3, please provide Hydro Ottawa's policy on the return of any remaining portion of a customer's performance security deposit should their forecast load not fully materialize within five years of project energization.

d) With respect to References 2 and 3, please state Hydro Ottawa's intention in respect of any remaining portion of this connecting customer's performance security deposit and the implications for the connecting customer if their load does not fully materialize as contemplated within five years of project energization.

RESPONSE

a) Hydro Ottawa's Offer to Connect is based on a templated agreement. This section generally references a deposit paid and thus 'Additional' is in reference to being on top of a deposit previously received. In the case of this project, there was no deposit and thus the word 'Additional' should not have been included.

b) Hydro Ottawa confirms the Developer would need to provide a performance security of \$791,000 as specified within the Offer to Connect. The Developer has several methods to satisfy the performance guarantee including cash, irrevocable letter of credit, certified cheque, bank draft, surety bond, or other equivalent form approved by Hydro Ottawa. There may be a cost the Developer would incur, but that is not known to Hydro Ottawa.

For clarity, Hydro Ottawa's offer does not require upfront capital from the Developer due to the economic evaluation calculation. Any cost incurred by the Developer to provide a performance guarantee is anticipated to be minimal compared to the reduced monthly electricity bill with the

1 Customer served by Hydro Ottawa compared to Hydro One. Developers providing a performance
2 guarantee is not unusual and typically a letter of credit is utilized.

3
4 Hydro Ottawa opine's that it would be in the best interest of the Developer to ensure their clients
5 are informed and satisfied with the decisions they have made to show they have considered their
6 clients interest. This would maintain good relationships, encourage client retention for potential
7 future projects and referrals to other potential clients.

8
9 c) Once the facilities are energized, Hydro Ottawa shall annually return the percentage of the
10 performance guarantee in proportion to the actual demand that materialized in that year (i.e., if
11 twenty percent of the forecasted demand materialized in that year, then Hydro Ottawa shall return
12 to the customer twenty percent of the performance guarantee). If, at the end of the customer
13 connection horizon, the forecasted demand has not materialized, Hydro Ottawa will draw/keep
14 the remaining amount from the performance guarantee to ensure rate payers are held whole in
15 compliance with the OEB's Distribution System Code.

16
17 Should the load materialize within the year, the entire performance guarantee will be released.

18
19 d) Please refer to part c) above and Hydro Ottawa's response to interrogatory HONI-4 part d).

INTERROGATORY RESPONSE - HONI-7

Question-7

TOPIC

Timing of Hydro Ottawa's Offer to Connect

REFERENCE

1. "The customer did not formally request a connection from Hydro Ottawa. Hydro Ottawa and Hydro One met with the customer on April 29, 2022 to explain the SAA process and subsequently Hydro Ottawa requested project documentation. In follow-up to this meeting, the customer submitted their documents to Hydro Ottawa on May 20, 2022 in order for Hydro Ottawa to prepare a connection offer. This same date, Hydro Ottawa contacted the customer to confirm receipt of the documents and discuss the information provided to incorporate into Hydro Ottawa's connection offer." – HOL Letter & Contested SAA, Attachment 1, p.2 – September 2, 2022
2. Chronology of events - HOL Letter & Contested SAA, Section 7.0, pp. 2-4 – September 2, 2022
3. HOL Letter & Contested SAA, Attachment E – September 2, 2022

INTERROGATORY

- a) With respect to Reference 1 and 2, if Hydro Ottawa was determined to supply the customer, why did Hydro Ottawa not:
 - i. more vigorously pursue the required documentation from the Developer throughout the Fall of 2021 and into 2022, especially knowing after Dec. 17, 2021, that Hydro One wished to serve the Customer and also that there was some urgency to settle the issue well before October of this year?
 - ii. request Hydro One's estimate for upgrading existing Hydro One distribution poles (to enable Hydro Ottawa to develop their own estimate) earlier than late June, 2022?
- b) Reference 3 reads that Hydro One's understanding is "that Hydro Ottawa would be **consenting**

1 to the SAA". Therefore, with respect to Reference 2 and Reference 3, why then, does Hydro
2 Ottawa provide as evidence that this "email clearly indicated that Hydro One was HONIaware that
3 Hydro Ottawa would be **contesting** the SAA", when the referenced email does not indicate that
4 therein?

6
7 **RESPONSE**

8 a)

9 i) For background and as referred to in the evidence below:

- 10 • The December 17, 2021 email from Hydro One asking for "Any update from
11 your side on this connection?"
- 12 • On November 23, 2021, Hydro One indicated they would not be moving
13 this file forward until early 2022.

14
15 In response to this question, Hydro Ottawa would like to note that connecting customers
16 at a territory boundary is not a competitive process and finds Hydro One's wording of
17 "more vigorously pursue" in line with a competitive position. In the context of answering
18 this question, Hydro Ottawa focused on Hydro Ottawa's normal communication process
19 with a new customer and how it was altered as a result of Hydro One's involvement
20 including relying on Hydro One's communication with the Developer.

21
22 Hydro Ottawa is continuously approached by customers with questions about their
23 electrical service options and energization of their property. Hydro Ottawa provides initial
24 information, but requires specific documentation from the customer such as an electrical
25 load summary, site plan, electrical single line diagram, etc., to engage in a formal project
26 and detailed design. Customers vary in their readiness to provide this information and/or
27 proceed with their plans, therefore, it is not typical for Hydro Ottawa to continually follow
28 up with customers, but rather allow them the time to gather and submit this information.

29
30 While throughout 2021 there were discussions between Hydro Ottawa and Hydro One
31 regarding serviceability of the property, Hydro Ottawa was not provided the project's

1 required documentation from the Customer, nor was Hydro Ottawa informed by Hydro
2 One that they had received this information from the Customer.

3
4 By way of email, see Attachment HONI-7(A): 626 Principale Casselman Servicing, Hydro
5 Ottawa was informed of a possible in-service date for the Customer of "later in 2022" from
6 Hydro One on November 23, 2021. At the same time, Hydro One provided a status of the
7 project and stated:

8
9 "we likely won't get to this design for a couple of months. For now, all I can offer is
10 that we'll likely only require make ready on one or two poles and will connect to the
11 customer's assets. The capital cost will range between \$10k to \$20k, but again this
12 is a very high level estimate."

13
14 In addition, Hydro One stated:

15
16 "We can definitely share more information as it becomes available but we'll be
17 looking into early 2022."

18
19 As a result, and due to the regulated requirement of the Distribution System Code to
20 produce an Offer to Connect within 60 days after receiving a connection request and
21 having the required project information, Hydro Ottawa understood that the Customer had
22 still not submitted project documentation. Additionally, Hydro Ottawa understood from
23 Hydro One's email that once this information was available, Hydro One would reach out
24 to Hydro Ottawa. Lastly, given the Customer was along the distribution territory boundary,
25 the Offer to Connect would be shared with Hydro Ottawa. As such, Hydro Ottawa relied
26 on this information and did not reach out further to the Customer as an update had been
27 provided.

28
29 As noted in Hydro Ottawa's evidence, Hydro Ottawa's dispute of the Service Area
30 Amendment Application - September 2, 2022, Hydro Ottawa acknowledged and
31 apologized for missing Hydro One's email dated December 17, 2021, which asked for an
32 update from Hydro Ottawa. Hydro Ottawa unfortunately missed the email until March 3,

2022, however the email still did not supply the information that was indicated would be ready by early 2022. As a result, Hydro Ottawa was unable to provide an Offer to Connect to the Customer.

In Hydro Ottawa's response to Hydro One on March 3, 2022, Hydro Ottawa confirmed it would pursue an SAA (meaning contest Hydro One's proposed SAA). On the same day Hydro Ottawa inquired about the Customer's updated contact information to ensure project documentation could be obtained. This information was not provided by Hydro One until April 25, 2022 and a subsequent meeting between all parties was held on April 29, 2022 where Hydro Ottawa requested the Customer information once again.

ii) As background

- Hydro Ottawa first informed Hydro One of the intent to use Hydro One's pole in order to service the Customer on June 9, 2021. Please see HONI-7(B): Initial Pole Discussion. On the same day Hydro One acknowledged the request and advised they had also spoken with someone else at Hydro Ottawa regarding the request and that Hydro One was looking into it.
- On June 15, 2021 Hydro One responded off the email chain referenced above and requested contact information for the Customer. No update was provided on the use of Hydro One Poles. Please see HONI-7(C): Customer Contact Information Request
- On June 15, 2021 Hydro One stated the reason for the request was because "We're just looking for more information on what they're planning to build and the timelines they're looking at". Please see attachment HONI-7(D): Hydro One Request to see what is being built.
- On June 18, 2021 Hydro Ottawa and Hydro One had a joint call where Hydro Ottawa's pole request was not addressed and Hydro One informed Hydro Ottawa they wanted to serve the Customer using the 44kV and that both LDC's should prepare an economic evaluation. Please see Attachment HONI-7(E): Hydro One 44 kV Service, for a meeting summary.
- On July 12, 2021 Hydro Ottawa requested an update on Hydro One's plan by email which Hydro One acknowledged the same date.

- On July 20, 2021 Hydro One indicated planning discussions were ongoing. Please see Attachment HONI-7(F): Hydro One confirmation of continued planning.
- The Customer provided Hydro Ottawa the requested information to connect the service on May 20, 2022.
- A derecho wind storm hit the City of Ottawa and Hydro Ottawa's service territory May 21, 2022. As a result, Hydro Ottawa resources were concentrated on storm recovery for roughly three weeks.
- Hydro Ottawa requested Hydro One's estimate for upgrading the existing Hydro One distribution poles 25 working days after the Customer provided Hydro Ottawa the relevant information. This timeframe was due to the unprecedented major weather event that occurred in Hydro Ottawa's service territory.

As noted above, Hydro Ottawa first engaged in discussions regarding joint pole use with Hydro One in June 2021. In an effort to be efficient with Hydro One resources, Hydro Ottawa was waiting to review the Customer information to better understand the servicing requirements prior to re-engaging Hydro One for an estimate for the pole line to be upgraded to support the required expansion. The information was received from the Customer on May 20, 2022 and the estimate was requested June 27, 2022 as resources returned to routine work after the main storm recovery efforts.

- b) Hydro Ottawa acknowledges and apologizes for the error and typo in its evidence within Hydro Ottawa's dispute of the Hydro One Service Area Amendment Application, dated September 2, 2022, that Hydro One has referenced.

Hydro Ottawa had intended to reference the email that had been sent on March 3, 2022 as reference to Hydro One being aware that Hydro Ottawa would contest a SAA Application. The March 3, 2022 email can be found as Attachment G to Hydro Ottawa's dispute of the Hydro One SAA Application.

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

From: **PATHMANATHAN Aarani** <Aarani.Pathmanathan@hydroone.com>

Date: Tue, Nov 23, 2021 at 2:08 PM

Subject: RE: [EXTERNAL] RE: 626 Principal Casselman Servicing

To: Murphy, Christopher <christophermurphy@hydroottawa.com>

Cc: SULEMAN Jayde <Jayde.Suleman@hydroone.com>, PATEL Dhaval <Dhaval.Patel@hydroone.com>

Hi Chris,

I think that we were planning a site meet with the customer last Friday and I'm trying to get a hold of our tech to determine if that went ahead. However, I'm told that since the customer is looking at connecting later in 2022, we likely won't get to this design for a couple of months. For now, all I can offer is that we'll likely only require make ready on one or two poles and will connect to the customer's assets. The capital cost will range between \$10k to \$20k, but again this is a very high level estimate.

Is this information good enough to start the conversation on your end? We can definitely share more information as it becomes available but we'll be looking into early 2022.

Thanks,

Aarani

Subject: [External] RE: 626 Principal Casselman Servicing
From: Jayde.Suleman@HydroOne.com
To: christophermurphy@hydroottawa.com
Cc: kenpreston@hydroottawa.com, laurieelliott@hydroottawa.com
Date Sent: Wednesday, June 9, 2021 11:35:33 AM GMT-04:00
Date Received: Wednesday, June 9, 2021 11:35:38 AM GMT-04:00

Hi Chris,

Actually good timing; This was discussed yesterday with Margaret and team on a call yesterday J so we are on it and looking into now.

I'll get back to you soon with some info.

Thanks
Jayde

From: Murphy, Christopher [mailto:christophermurphy@hydroottawa.com]
Sent: Wednesday, June 09, 2021 11:25 AM
To: SULEMAN Jayde
Cc: Preston, Ken; Laurie Elliott
Subject: 626 Principal Casselman Servicing

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Hi Jayde,

We have a customer request to connect 3MW in the Village of Casselman. The main property that was sold was 626 Principal in HOL's service territory, but the customer also purchased and I imagine will amalgamate (if not done already) the two properties to the east which fall within HONI's service territory. Details are still coming in, but we would like to discuss what would be needed to provide service to this customer. We have reviewed and would be able to supply from our 8kV system, but would require a system expansion (expected to be offset by the economic evaluation) across the highway through the upgrade of the HONI poles.

Who should we discuss this with?

Thanks,
Chris Murphy
Manager, Distribution Design
Gestionnaire, Conception Distribution
christophermurphy@hydroottawa.com
Tel./tél.: [613 738-5499](tel:6137385499) | ext./poste 7114
Cell.: [613 868-1548](tel:6138681548)
Hydro Ottawa Limited / Hydro Ottawa limitée
2711 Hunt Club Road, PO Box 8700/chemin Hunt Club, C.P. 8700
Ottawa, Ontario K1G 3S4
hydroottawa.com

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Subject: RE: [External] RE: 626 Principal Casselman Servicing
From: Jayde.Suleman@HydroOne.com
To: christophermurphy@hydroottawa.com
Cc: Aarani.Pathmanathan@HydroOne.com
Date Sent: Tuesday, June 15, 2021 10:38:52 AM GMT-04:00
Date Received: Tuesday, June 15, 2021 10:38:57 AM GMT-04:00

Hi Chris,

Do you have the potential customers contact info that you can share with us?

..Jayde

From: Murphy, Christopher [mailto:christophermurphy@hydroottawa.com]
Sent: Wednesday, June 09, 2021 11:36 AM
To: SULEMAN Jayde
Cc: Preston, Ken; Laurie Elliott
Subject: Re: [External] RE: 626 Principal Casselman Servicing

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Thanks Jayde

Thanks,

Chris Murphy

Manager, Distribution Design

Gestionnaire, Conception Distribution

christophermurphy@hydroottawa.com

Tel./tél.: [613 738-5499](tel:6137385499) | ext./poste 7114

Cell.: [613 868-1548](tel:6138681548)

Hydro Ottawa Limited / Hydro Ottawa limitée

2711 Hunt Club Road, PO Box 8700/chemin Hunt Club, C.P. 8700

Ottawa, Ontario K1G 3S4

hydroottawa.com

On Wed, Jun 9, 2021 at 11:35 AM <Jayde.Suleman@hydroone.com> wrote:

Hi Chris,

Actually good timing; This was discussed yesterday with Margaret and team on a call yesterday J so we are on it and looking into now.

I'll get back to you soon with some info.

Thanks

Jayde

From: Murphy, Christopher [mailto:christophermurphy@hydroottawa.com]
Sent: Wednesday, June 09, 2021 11:25 AM
To: SULEMAN Jayde
Cc: Preston, Ken; Laurie Elliott
Subject: 626 Principal Casselman Servicing

*** Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. ***

Hi Jayde,

We have a customer request to connect 3MW in the Village of Casselman. The main property that was sold was 626 Principal in HOL's service territory, but the customer also purchased and I imagine will amalgamate (if not done already) the two properties to the east which fall within HONI's service territory. Details are still coming in, but we would like to discuss what would be needed to provide service to this customer. We have reviewed and would be able to supply from our 8kV system, but would require a system expansion (expected to be offset by the economic evaluation) across the highway through the upgrade of the HONI poles.

Who should we discuss this with?

Thanks,

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Subject: RE: [External] RE: 626 Principal Casselman Servicing
From: Aarani.Pathmanathan@HydroOne.com
To: Jayde.Suleman@HydroOne.com,christophermurphy@hydroottawa.com
Date Sent: Tuesday, June 15, 2021 10:57:14 AM GMT-04:00
Date Received: Tuesday, June 15, 2021 10:57:21 AM GMT-04:00

Hi Chris,

Yes, that's exactly it. We're just looking for more information on what they're planning to build and the timelines they're looking at. Can I go ahead and reach out or did you want to touch base with the customer first?

Thank you,
Aarani

From: SULEMAN Jayde <Jayde.Suleman@HydroOne.com>
Sent: Tuesday, June 15, 2021 10:49 AM
To: 'Murphy, Christopher' <christophermurphy@hydroottawa.com>; PATHMANATHAN Aarani <Aarani.Pathmanathan@HydroOne.com>
Subject: RE: [External] RE: 626 Principal Casselman Servicing

Over to you Aarani J.....

From: Murphy, Christopher [<mailto:christophermurphy@hydroottawa.com>]
Sent: Tuesday, June 15, 2021 10:47 AM
To: SULEMAN Jayde
Cc: PATHMANATHAN Aarani
Subject: Re: [External] RE: 626 Principal Casselman Servicing

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Hi Jayde,

Our main contact has been Domenic, info below. To ensure we are providing the customer with the appropriate information can you let me know the plan from HONI? Are you looking to get more information about the project?

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

 Description: Description:
Leeswood logo final copy.jpg

1675 Transcanadienne, suite 135
Dorval, QC H9P 1J1
T - (514) 457-6745
C - (514) 809-0891
dfabiano@leeswood.ca
www.leeswood.ca

Thanks,

Chris Murphy

Manager, Distribution Design
Gestionnaire, Conception Distribution
christophermurphy@hydroottawa.com
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Ottawa, Ontario K1G 3S4
hydroottawa.com

On Tue, Jun 15, 2021 at 10:38 AM <Jayde.Suleman@hydroone.com> wrote:

Hi Chris,

Do you have the potential customers contact info that you can share with us?

..Jayde

From: Murphy, Christopher [mailto:christophermurphy@hydroottawa.com]
Sent: Wednesday, June 09, 2021 11:36 AM
To: SULEMAN Jayde
Cc: Preston, Ken; Laurie Elliott
Subject: Re: [External] RE: 626 Principal Casselman Servicing

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Thanks Jayde

Thanks,

Chris Murphy

Manager, Distribution Design
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Thanks,

Chris Murphy

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christophermurphy@hydroottawa.com

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Subject: RE: [External] RE: 626 Principal Casselman Servicing
From: Jayde.Suleman@HydroOne.com
To: christophermurphy@hydroottawa.com
Cc: Aarani.Pathmanathan@HydroOne.com, kenpreston@hydroottawa.com
Date Sent: Friday, June 18, 2021 12:50:26 PM GMT-04:00
Date Received: Friday, June 18, 2021 12:50:35 PM GMT-04:00

Thanks everyone a quick summary:

- Aarani is going to dig deeper into the 8kV option for HONI, however the 44kV option seems to be the more preferred or reliable one for future possible growth too.
- Looking at the connection HONI does appear to be the better suited to serve the customer; after our follow up call on Monday the 28th we can discuss next steps.
- It is preferred if we do the economic evaluation that one party supports the other in order to cut down timelines with the SAA application with the OEB.
- Customer requesting Temp construction- late summer early fall- site trailers, then will move into late spring 2022 with a more permanent supply.

Have a great weekend,
Jayde

-----Original Appointment-----

From: SULEMAN Jayde
Sent: Thursday, June 17, 2021 12:32 PM
To: SULEMAN Jayde; Murphy, Christopher
Cc: PATHMANATHAN Aarani; Preston, Ken
Subject: [External] RE: 626 Principal Casselman Servicing
When: Friday, June 18, 2021 12:30 PM-1:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: conference call

Thanks Chris.

Please dial 1-877-385-4099 ID 2932541

Thanks
Jayde

From: Murphy, Christopher [<mailto:christophermurphy@hydroottawa.com>]
Sent: Thursday, June 17, 2021 12:23 PM
To: SULEMAN Jayde
Cc: PATHMANATHAN Aarani; Preston, Ken
Subject: Re: [External] RE: 626 Principal Casselman Servicing

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Hey Jayde,

I do have an appointment this afternoon so I could do 15 minutes or a call from the car, otherwise I have some availability tomorrow 12-1 or 2-3.

Thanks,

Chris Murphy

*Manager, Distribution Design
Gestionnaire, Conception Distribution*

christophermurphy@hydroottawa.com
Tel./tél.: [613 738-5499](tel:6137385499) | ext./poste 7114
Cell.: [613 868-1548](tel:6138681548)

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2711 Hunt Club Road, PO Box 8700/chemin Hunt Club, C.P. 8700
Ottawa, Ontario K1G 3S4
hydroottawa.com

On Thu, Jun 17, 2021 at 12:14 PM <Jayde.Suleman@hydroone.com> wrote:

Hi Chris,

Are you free for 2:30pm today for a follow up call on this?

..Jayde

From: Murphy, Christopher [mailto:christophermurphy@hydroottawa.com]
Sent: Tuesday, June 15, 2021 11:32 AM
To: PATHMANATHAN Aarani
Cc: SULEMAN Jayde; Preston, Ken
Subject: Re: [External] RE: 626 Principal Casselman Servicing

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Thanks Aarani,

Please go ahead and reach out, we will inform them to expect an email from you.

Should we set up a meeting to discuss or do you want to get info from them first and then we can schedule something?

Thanks,

Chris Murphy

*Manager, Distribution Design
Gestionnaire, Conception Distribution*

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On Tue, Jun 15, 2021 at 10:57 AM <Aarani.Pathmanathan@hydroone.com> wrote:

Hi Chris,

Yes, that's exactly it. We're just looking for more information on what they're planning to build and the timelines they're looking at. Can I go ahead and reach out or did you want to touch base with the customer first?

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Our main contact has been Domenic, info below. To ensure we are providing the customer with the appropriate information can you let me know the plan from HONI? Are you looking to get more information about the project?

Domenic Fabiano

Senior Vice-President/ Partner

Vice-président/ Partenaire

1675 Transcanadienne, suite 135

Dorval, QC H9P 1J1

T - (514) 457-6745

C - (514) 809-0891

dfabiano@leeswood.ca

<https://ddei5-0-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=www.leeswood.ca&umid=8A2A8E17-C4F8-A205-B028-33B4484CC20A&auth=7c4ba316753dc19277b4cd0bdedce6f0c8e9311b-9562fa04e01ccdf6fc93c963b663891b2cc1c791>

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Thanks Jayde

Thanks,

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Murphy, Christopher <christophermurphy@hydroottawa.com>

[EXTERNAL] RE: 626 Principal Casselman Servicing

Aarani.Pathmanathan@hydroone.com <Aarani.Pathmanathan@hydroone.com>
To: christophermurphy@hydroottawa.com, Jayde.Suleman@hydroone.com
Cc: kenpreston@hydroottawa.com

Tue, Jul 20, 2021 at 3:21 PM

Hi Chris,

Sorry I missed your email. We are able to connect the load at 626 Principal to the 8 kV. However, we're still in conversation with the customer to determine which option they'd want to move forward with. I'll touch base with our planners and see if they have any more context.

Thanks,
Aarani

From: Murphy, Christopher <christophermurphy@hydroottawa.com>
Sent: Monday, July 12, 2021 10:19 AM
To: SULEMAN Jayde <Jayde.Suleman@HydroOne.com>; PATHMANATHAN Aarani <Aarani.Pathmanathan@HydroOne.com>
Cc: Preston, Ken <kenpreston@hydroottawa.com>
Subject: 626 Principal Casselman Servicing

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Hi Jayde and Aarani,

I was wondering if there was any movement on the review of the 8 kV servicing option for 626 Principal?

Additionally, have you been able to review/finalize the letter for the Boundary project?

Thanks,

Chris Murphy

Manager, Distribution Design

Gestionnaire, Conception Distribution

christophermurphy@hydroottawa.com

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Cell.: 613 868-1548

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INTERROGATORY RESPONSE - HONI-8

Question-8

TOPIC

Protecting the interests of the Customer

REFERENCE

1. Chronology of events - HOL Letter & Contested SAA, Section 7.0, pp. 2-4 – September 2, 2022
2. “All communications on the future (permanent) serving of 626 Principale Street has been with the developer. Upon being advised by the municipality (May 31, 2021) that a new facility was going to be developed at 626 Principale Street, Hydro Ottawa reached out to the developer on June 8, 2021 and Hydro One on June 9, 2021. On June 11, 2021, Hydro Ottawa provided the customer with supply information. A meeting with the developer, Hydro One and Hydro Ottawa was held on April 29, 2022 to provide information on the SAA process and with the respective information requirements.” - HOL Letter & Contested SAA, Attachment 1, pp. 2-3 – September 2, 2022
3. “Hydro Ottawa was first approached by the municipality of Casselman on May 31, 2021. Subsequently, Hydro Ottawa reached out to the developer, acting for the customer on June 8, 2021. Hydro Ottawa advised Hydro One about the development on June 9, 2021 to ensure both parties could supply an offer to connect should that be the result of further analysis. Hydro Ottawa was not initially provided the required servicing documents from the customer.” – HOL Letter & Contested SAA, Attachment 1, p. 2 – September 2, 2022

INTERROGATORY

- a) With respect to Reference 1, 2 and 3, what was Hydro Ottawa's understanding of the final customer's supply needs after reaching out to the Developer acting for the final customer on June 8, 2021?

- 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:

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From: **Domenic Fabiano** <dfabiano@leeswood.ca>
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



1675 Transcanadienne, suite 135
Dorval, QC H9P 1J1
T - (514) 457-6745
C - (514) 809-0891
dfabiano@leeswood.ca
www.leeswood.ca

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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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