

Hydro One Networks Inc.

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BY EMAIL AND RESS

December 8, 2022

Ms. Nancy Marconi
Registrar
Ontario Energy Board
Suite 2700, 2300 Yonge Street
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Ms. Marconi,

EB-2022-0234 – s.74 (SAA) – Application for Hydro One Networks Inc. to Connect One Industrial Customer located at 626 Principale St. in Casselman – Interrogatories

In accordance with Procedural Order 2, issued November 30, 2022, please find enclosed Hydro One Networks Inc's written interrogatories with respect to Hydro Ottawa's new evidence on its alternative pole line in this proceeding.

A copy of this cover letter and the enclosed written interrogatories have been filed in text-searchable electronic form through the Ontario Energy Board's Regulatory Electronic Submission System.

Sincerely,



Joanne Richardson

C/ Intervenors of record (electronic only)

**HYDRO ONE NETWORKS INC.
Service Area Amendment Application**

**Hydro One Networks Inc. Supplemental Interrogatories
December 8, 2022**

1 **HONI-1:**

2
3 **Topic:**

4 Assessment of Alternatives

5
6 **Reference:**

7 1. Hydro Ottawa Response to OEB Staff Interrogatory 1

8
9 Hydro Ottawa currently rents 34 poles from Hydro One in Casselman.
10 Hydro Ottawa's Joint Use Agreement with Hydro One is based upon a
11 mutual desire by both Parties to work together for their respective benefit,
12 and to ensure that joint use is planned and implemented where feasible
13 because it is the right approach and provides the optimal outcome for each
14 party's Customers that it serves, its employees and stakeholders.
15 Therefore, Hydro Ottawa's proposal aligns with the outcomes set out in the
16 Joint Use Agreement. However, Hydro Ottawa would also be able to
17 construct a separate pole line along the east side of Principale Street. While
18 this would not be the preferable option, it could be done for a comparable
19 price to the estimate provided by Hydro One, should Hydro One not be able
20 to accommodate Hydro Ottawa's system expansion on their pole line.

21
22 2. OEB Notice of Amendments to a Code, Amendments to the Distribution System Code
23 – December 21, 2015 – page 4

24
25 3. Hydro Ottawa Submissions, September 2, 2022 – pages 2-19

26
27 **Interrogatory:**

28 a) Please place a copy of Hydro Ottawa's Joint Use Agreement with Hydro One on the
29 record of this proceeding.

30
31 b) Please provide all records documenting Hydro Ottawa's consideration of this
32 connection option and evidence to support why this connection alternative was
33 dismissed as the less preferred option to connect the Subject Area.

- 1 c) Please provide the Hydro Ottawa cost estimate to construct a pole line along the east
2 side of Principale Street. In so doing, please document the quality¹ of the estimate that
3 underpins the Hydro Ottawa cost estimate for this work.
4
- 5 d) Please provide any Ontario Ministry of Transportation requirements for this newly
6 proposed alternative.
7
- 8 e) Hydro Ottawa has not provided a physical connection date nor is there any date
9 identified on the record as to when Hydro Ottawa can physically serve the Subject
10 Area if Hydro Ottawa were to construct a separate pole line along the east side of
11 Principale Street to serve the Subject Area. Please provide the date that Hydro Ottawa
12 can physically serve 626 Principale Street if this option is pursued. In so doing, please
13 provide a detailed schedule that outlines all necessary milestones that must be
14 accomplished for Hydro Ottawa to meet that date. Please include all anticipated dates
15 of receiving permits and permitting applications, designs, constructions milestones,
16 etc.
17
- 18 f) Contingent on Hydro Ottawa's response to part e), and given the date of the temporary
19 connection was January 11, 2022², how long will Hydro One's connection be required
20 to complete the newly proposed Hydro Ottawa alternative along the east side of
21 Principale.

¹ In terms of Association for the Advancement of Cost Engineering (AACE) or universally recognized equivalent.

² Exhibit I, Tab 2, Schedule 11 part b)

1 **HONI-2:**

2
3 **Topic:**

4 Assessment of Alternatives

5
6 **Reference:**

7 1. Hydro Ottawa Response to OEB Staff Interrogatory 1

8
9 Hydro Ottawa currently rents 34 poles from Hydro One in Casselman.
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11 mutual desire by both Parties to work together for their respective benefit,
12 and to ensure that joint use is planned and implemented where feasible
13 because it is the right approach and provides the optimal outcome for each
14 party's Customers that it serves, its employees and stakeholders.

15 Therefore, Hydro Ottawa's proposal aligns with the outcomes set out in the
16 Joint Use Agreement. However, Hydro Ottawa would also be able to
17 construct a separate pole line along the east side of Principale Street. While
18 this would not be the preferable option, it could be done for a comparable
19 price to the estimate provided by Hydro One, should Hydro One not be able
20 to accommodate Hydro Ottawa's system expansion on their pole line.
21

22 2. Hydro Ottawa Response to OEB Staff Interrogatory 2

23
24 For the Casselman station only the Common Sub-Transmission (Common
25 ST) Line charge applies. Hydro Ottawa does not have an hourly load profile
26 of the Customer and as a result does not know to what extent the Customer
27 will contribute to the system peak which this charge is based on. In addition,
28 if the Customer's load does not have a peak that is coincident to the
29 relevant system peak, it could result in the Customer sharing the existing
30 low voltage charges in Hydro Ottawa's service territory.
31

32 **Interrogatory:**

33 a) Given the new alternative being contemplated by Hydro Ottawa to build on the east
34 side of Principale Street, and assuming the full load of the Customer will contribute to
35 Hydro Ottawa's system peak, please outline whether there would be any impact on
36 the low voltage charges paid by Hydro Ottawa's customers if this connection is
37 pursued by Hydro Ottawa. Please provide an estimate of the potential increase under
38 the assumption that the full load of the Customer contributes to Hydro Ottawa's system
39 peak. Please confirm whether the impact would be different if the preferred alternative
40 proposed by Hydro Ottawa is pursued under these assumptions.

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