



By RESS and Email

December 8, 2022

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

Dear Ms. Marconi:

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

Pursuant to the Ontario Energy Board's Notice of Hearing and Procedural Order No. 2, issued November 30, 2022, Hydro Ottawa Limited ("Hydro Ottawa") hereby submits the attached interrogatories to Hydro One Networks Inc. (Hydro One), with regards to Hydro One's Supplemental Evidence submitted on November 7, 2022.

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

Sincerely,

DocuSigned by:

April Barrie

1E403775748B4CB...

April Barrie

Director, Regulatory Affairs

Directeur, Affaires réglementaires

aprilbarrie@hydroottawa.com

Tel./tél.: 613 738-5499 | ext./poste 2106

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Cc:

Joanne Richardson, Director, Regulatory Affairs, Hydro One Networks Inc.
Jeffrey Smith, Director Regulatory Compliance, Hydro One Networks Inc.
Pasquale Catalano, Sr. Regulatory Advisor, Hydro One Networks Inc.
Shuo Zhang, Case Manager, Ontario Energy Board
James Sidlofsky, Counsel, Ontario Energy Board
Claudio Bertone

1 Procedural Order 2

2

3 THE ONTARIO ENERGY BOARD ORDERS THAT:

4

5 Hydro One and Hydro Ottawa shall request any information and documentation from each other
6 on Hydro One's supplementary evidence and Hydro Ottawa's new evidence on its alternative pole
7 line, by written interrogatories filed with the OEB and delivered to all parties by **December 8,**
8 **2022.**

9

10 **Interrogatories**

11

12 **HOL 19.**

13

14 **Reference: Hydro One's supplemental evidence 20221107 - Hydro One Pole Line**
15 **Upgrade**

16 **Email exchange from June 9, 2021, as provided in response to HONI-7, Attachment B**

17

18 **Preamble:** On June 9, 2021 Hydro Ottawa informed Hydro One of the customer connection
19 request at 626 Principale St, Casselman and indicated Hydro Ottawa's ability to service on
20 the 8kV system, noting a system expansion and upgrade of Hydro One poles would be
21 needed. Furthermore, Hydro Ottawa enquired as to who the contact at Hydro One should be
22 to discuss the request. Also on June 9, a Hydro One staff member stated they would look
23 into the request. Hydro One provided Hydro Ottawa with a high level cost estimate for
24 upgrading this pole line on July 11, 2022 at a cost of **\$600k which is +/- 50%.**

25

26 **Questions:**

27

28 a. Why did Hydro One not inform Hydro Ottawa when it was approached by
29 Existing Joint Use Tenant ("Existing Joint Use Tenant") customer in March, 2022
30 to upgrade the pole line, when Hydro One was aware that Hydro Ottawa would
31 require this pole line to accommodate Hydro Ottawa's circuit, as indicated in the
32 June 9, 2021 email?

33

34 b. Why did Hydro One not include the height requirements in its pole line upgrade
35 design needed to allow Hydro Ottawa the ability to provide a Hydro Ottawa
36 circuit, as indicated in the June 9, 2021 email and reflected in Hydro One's high
37 level cost estimate provided to Hydro Ottawa in the July 11, 2022 email?

38

39 c. When Hydro One was informed of the requirements of the Ministry of
40 Transportation (MTO) for increased circuits and height in August, 2022, why did
41 Hydro One not engage Hydro Ottawa to discuss the requirements and options,
42 since Hydro One was aware that Hydro Ottawa was interested in bringing in a
second feeder?

43

44 d. Please provide all responses to Hydro Ottawa's request to attach to Hydro One's
poles in June 2021.

45

1 **HOL 20.**

2

3 **Reference: Hydro One's supplemental evidence 20221107 - Hydro One Pole Line**
4 **Upgrade**

5

6 **Preamble:** Hydro One indicated that, in order to service future adjacent loads, a 44kV line
7 may be required.

8

9 **Questions:**

- 10 a. Does Hydro One's plan to upgrade its pole line to accommodate a future 44kV
11 circuit, as part of the pole upgrade being driven by the telecom, take into account
12 forecasted load growth?
- 13 b. If so, is forecasted load growth being prioritized over the ability to support Hydro
14 Ottawa's requested circuit?
- 15 c. Is the MTO's concern and potential relocation of the pole line being driven by the
16 pole height, with the assumption of accommodating the existing Hydro One 8kV
17 and proposed Hydro Ottawa 8kV circuits, or does it also include space for a
18 Hydro One 44kV circuit?
- 19 d. Did Hydro One request or have discussion with the MTO to use the pole line to
20 accommodate a 44kV line?

21

22 **HOL 21.**

23

24 **Reference: Hydro One's supplemental evidence 20221107 - Pole Upgrade Request by**
25 **Existing Joint Use Tenant, page 1, lines 19 to 31**

26

27 **Preamble:** Hydro One states that "In August of 2022, the MTO informed Hydro One that to
28 accommodate the additional request from the Existing Joint Use Tenant, the existing poles
29 would need to be increased in size to maintain necessary height clearances at the Principale
30 Street and Highway 417 interchange. Hydro One has been working with the Existing Joint
31 Use Tenant and MTO to establish a design and apportion cost responsibilities for the new
32 poles. On September 27, 2022, an agreement in principle was reached by all parties on the
33 design and cost responsibilities. Discussions amongst the impacted parties and coordination
34 activities are ongoing, including, the sourcing of materials to meet the Existing Joint Use
35 Tenant's request and install their requested equipment. As Hydro Ottawa is not a joint use
36 tenant on this pole line, the Existing Joint Use Tenant-initiated and MTO-driven work should
37 not have any impact on the operations of Hydro Ottawa, however, as a courtesy, Hydro
38 Ottawa will be notified of the implementation schedule of the Joint Use Project when
39 established."

40

41 Hydro One and Hydro Ottawa have a joint use agreement.

1 **Questions:**

- 2 a. What is the timeline required by the joint use tenant for the completion of Hydro
3 One's pole line upgrade?
- 4 b. Does Hydro One's Joint Use Agreement include provisions for the prioritization of
5 pole attachment requests when they are received from more than one party?
- 6 c. Does Hydro One prioritize existing tenants on poles over other joint use requests
7 by other parties with existing joint use agreements that are submitted regardless
8 of timing?
- 9 d. Does Hydro One prioritize telecom joint use requests over LDC requests for joint
10 use on the pole?
- 11 e. If there are no prioritization provisions, please confirm how Hydro One prioritizes
12 requests from multiple third parties for pole attachments.
- 13 f. When other joint use parties request use of Hydro One poles, can distributors
14 rely on Hydro One to provide access to their poles?
- 15 g. If a distributor requests access to a Hydro One pole in order to connect a
16 customer and subsequently a telecommunication company, either a current
17 tenant or not, requests access to the pole, is the distributor's request at risk?
- 18 h. Please provide a current version of Hydro One's Joint Use Agreement with Hydro
19 Ottawa.
- 20 i. Please explain how the Existing Joint Use Tenant and MTO work should not
21 have any impact on the operations of Hydro Ottawa?
- 22 j. What is the typical timeframe for Hydro One to answer a joint use request on its
23 poles to other distributors?
- 24 k. How does Hydro One's statement in the preamble to this question align with the
25 OEB's position on joint use poles?
- 26 l. Please confirm that no work would be required on the poles discussed in Hydro
27 One's supplemental evidence 20221107, if the Existing Joint Use Tenant's
28 request had not been made.
- 29 m. Please confirm that Hydro One has no other projects or project requests related
30 to the poles Hydro Ottawa has requested joint use of in relation to the connection
31 of 626 Principale St, Casselman.

32
33 **HOL 22.**

34
35 **Reference: Hydro One's supplemental evidence 20221107 - MTO Permit, page 2, lines**
36 **5 to 17**

37
38 **Preamble:** "The new poles that will be installed on the existing pole centre-line as part of
39 the Joint Use Project will likely not be able to accommodate two 8.32kV circuits (one-three
40 phase 8.32kV Hydro One circuit is already on these Hydro One poles) due to MTO
41 requirements. In discussions with the MTO about this project, Hydro One was made aware
42 that the permit being sought from the MTO would not support a second circuit on the existing

1 pole centre-line. If a second circuit is sought, the MTO has shared that the distributor will
2 need to secure an additional permit and will be required to relocate the centre-line of the
3 pole line to the west to maintain an 80m separation from the location of the overpass.
4

5 Should a determination be made by the OEB that a second 8.32kV circuit needs to
6 be accommodated on this pole line for Hydro Ottawa to serve 626 Principale Street, a new
7 pole line will need to be redesigned, replaced, and potentially relocated, contingent on the
8 requirements of the MTO.”

9 **Questions:**

- 10 a. Please confirm if Hydro One initially requested a permit for one or two 8.32 kV
11 circuits from the MTO?
- 12 b. When the MTO advised that an additional permit would be required for a second
13 circuit, as well as, relocating the centre-line of the pole line to the west to
14 maintain an 80m separation from the location of the overpass, did Hydro One
15 weigh the potential cost implications to both Hydro One and Hydro Ottawa, in
16 light of the active Hydro Ottawa disputed Hydro One SAA?
- 17 c. Would Hydro Ottawa's request, regardless of the Telecom Existing Joint Use
18 Tenant request, require the pole line to be moved?
- 19 d. If Hydro Ottawa's joint pole use request had been actioned first, would the
20 Telecom Existing Joint Use Tenant request have been required to have the pole
21 line moved?
- 22 e. If Hydro Ottawa's joint pole use request had been actioned first, would the
23 Telecom Existing Joint Use Tenant be required to pay to move the pole?
- 24 f. When the MTO advised that an additional permit would be required for a second
25 circuit, as well as relocating the centre-line of the pole line to the west to maintain
26 an 80m separation from the location of the overpass, did Hydro One weigh the
27 potential cost implications to both Hydro One and Hydro Ottawa, in light of the
28 request by Hydro Ottawa to attach to Hydro One's poles?
- 29 g. Please confirm if Hydro One estimated the costs of upgrading the poles to
30 accommodate the Existing Joint Use Tenant, as well as, Hydro Ottawa's plans to
31 utilize the pole line for an 8.32kV circuit?
- 32 i. If so, what was the estimated cost?
- 33 ii. If no assessment was made, please explain why?
- 34 h. Please provide any written requests made on or after June 9, 2021 to the MTO in
35 regards to the poles Hydro Ottawa requested joint use of in order to serve the
36 customer at 626 Principale St, Casselman.
- 37 i. Please provide a summary of any verbal requests made on or after June 9, 2021
38 to the MTO in regards to the poles Hydro Ottawa requested joint use of in order
39 to serve the customer at 626 Principale St, Casselman.

1 **HOL 23.**

2

3 **Reference: Hydro One's supplemental evidence 20221107 - Cost of Hydro Ottawa's**
4 **Proposal, page 2, lines 19-24**

5

6 **Preamble:** "As a result, if Hydro Ottawa was to serve the customer at 626 Principale Street,
7 the work described above will not reduce the cost of the Hydro Ottawa proposal from an
8 incremental capital cost perspective. In fact, addressing the request may increase the cost
9 of the high-level estimate provided to Hydro Ottawa because of the redesign, replacement
10 and potential relocation of the poles that will be necessitated by the addition of a second
11 8.32kV circuit on this pole line."

12

13 **Questions:**

- 14 a. Please confirm the rationale for Hydro One's support of a likely higher-cost
15 solution to meet the needs of the Existing Joint Use Tenant and potential needs
16 of Hydro Ottawa?
- 17 b. Could the Existing Joint Use Tenant have achieved savings if Hydro Ottawa's
18 request had been coordinated?
- 19 c. Will Hydro One customers pay for any of the work related to the Existing Joint
20 Use Tenant requested work?
- 21 d. Is it Hydro One's assertion that the cost to Hydro Ottawa is likely to go up based
22 solely on the fact that the Existing Joint Use Tenant request would be actioned
23 first?

24

25 **HOL 24.**

26

27 **Reference: Hydro One's supplemental evidence 20221107 - Hydro One Pole Line**
28 **Upgrade**

29 **Reference: Hydro One's SAA Application Submission dated 2022-09-09,**

30

31 **Preamble:** Hydro One is providing this correspondence as it has become clear during the
32 development of responses to interrogatory questions posed by OEB Staff and Hydro Ottawa
33 that there may be additional information that the OEB and/or Hydro Ottawa may find
34 pertinent to this proceeding, specifically regarding works that have been requested along the
35 same pole line that will require upgrading for Hydro Ottawa to execute its proposed
36 connection to the Subject Area of this proceeding.

37

38

39 **Questions:**

- 40 a. When Hydro One receives multiple requests for joint use of the same poles or
41 other assets, does Hydro One treat each request independently without
42 consideration of the impact on other requestors?

- 1 b. Does Hydro One have processes in place to coordinate multiple projects
2 involving the same assets in order to efficiently manage design work and to avoid
3 or limit the need to redesign or rebuild electricity infrastructure?
4 c. If processes are in place, how does Hydro One engage the associated
5 stakeholders?
6

7 **HOL 25.**

8
9 **Reference: Hydro One's supplemental evidence 20221107 - Hydro One Pole Line**
10 **Upgrade**

11
12 **Preamble:** As Hydro Ottawa is not a joint use tenant on this pole line, the Existing Joint Use
13 Tenant-initiated and MTO-driven work should not have any impact on the operations of
14 Hydro Ottawa, however, as a courtesy, Hydro Ottawa will be notified of the implementation
15 schedule of the Joint Use Project when established.
16

17 **Questions:**

- 18 a. Does Hydro One have an update to the implementation schedule?
19 b. If yes, please provide the updated implementation schedule.