

Interrogatory #1

Reference:

Customer's Supplementary Evidence 2023-05-19, Attachment 2-A.

Preamble:

In the Customer's 2023-05-19 Supplementary Evidence, the Customer filed a copy of a May 17, 2023, Capacity Allocation Commitment with Hydro One as Attachment 2-A.

Question(s):

- (a) Please advise what led to the referenced letter? What changed that made the letter agreement necessary?
- (b) When did negotiations for the referenced letter commence and which party made the suggestion?
- (c) Please provide all drafts of the letter.
- (d) Please confirm that the letter would provide an Edgeware TS station capacity allocation to the Customer of [REDACTED]
- (e) Please confirm that the letter would provide redundant feeder capacity on the M7 and M8 of [REDACTED]
- (f) Please describe any discussions Formet and Hydro One have had about the installation of power factor correction improvement equipment. What was the conclusion of these discussions?
- (g) Please provide all communication regarding the May 17, 2023 agreement between Hydro One and Formet.
- (h) What commitments in the letter are new? If none, then why is the letter necessary?
- (i) Please quantify the bill impacts of the letter agreement for Formet.

Interrogatory #2

Reference:

Entegrus Application 2022-10-17, Section 3.

Preamble:

In the Application, Entegrus explained that Hydro One had not permitted Entegrus to speak with the Customer, and requested permission from the OEB, which was granted on March 17, 2023.

Question(s):

- (a) Please provide all communications exchanged between Formet and Hydro One from the time that Entegrus requested permission to speak with the Customer in relation to the SAA (May 31, 2022) until the date when the OEB granted permission on March 17, 2023.

- (b) Please provide all communications exchanged between Formet and Hydro One following Entegrus' meeting with Formet.

If Formet or Hydro One claims privilege over any such communications, please advise of the basis for such privilege claim and the dates and personnel included in each such communication.

Interrogatory #3

Reference:

Customer Evidence 2023-04-17, paragraph 26.

Preamble:

At paragraph 26 Formet states: *"The dedicated feeders were purpose-built for the Plant. Formet has satisfied its obligation to pay off the full contracted amount for capital costs of the dedicated feeders. Entegrus has received payment in full for them and has recorded such payment as revenue in its OEB filings. This Application therefore seeks to give the feeders over to Entegrus and its customers after (i) Entegrus' original shareholder (the City of St. Thomas) has profited from the Plant, and its associated jobs and economic development; (ii) Formet and Hydro One have each paid in full the contracted amounts for the construction, operation and maintenance of the two dedicated feeders, and (iii) Entegrus and its predecessors have been paid in full for the cost of the feeders and booked such payments as revenue."*

Question(s):

- (a) What credit will Formet receive from Hydro One from having paid rates for service using the M7/M8 feeders over many years?

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- (b) Will Hydro One treat these assets as having been paid for by Formet and therefore collect less in rates than it would from other customers in the same rate class?

Interrogatory #4

Reference:

Customer Evidence 2023-04-17, Exhibit H.

Preamble:

At Exhibit H of the Customer 2023-04-17 evidence, the Customer provides a copy of the EB-2007-0969 Decision, wherein, under OEB Act Section 86(1)(b), Hydro One is granted leave to sell various assets to the Customer, including eight 27.6/0.6 kV transformers with a nameplate capacity of 4,000 kVa.

Question(s):

- (a) Please confirm that the Customer facility continues to have eight operational 27.6/0.6 kV transformers with a nameplate capacity of 4,000 kVa onsite.
- (b) If the Customer facility no longer has eight operational 27.6/0.6 kV transformers with a nameplate capacity of 4,000 kVa onsite, please provide the number and type of operational transformers, along with the individual nameplate capacity and total nameplate capacity.