

June 30, 2023

**BY EMAIL AND FILED VIA RESS**

Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street  
Suite 2700  
Toronto, ON M4P 1E4

Dear Ms. Marconi:

**Re: Entegrus Powerlines Inc. (“Entegrus”)  
EB-2022-0178 – SAA Application  
Request for Updated Interrogatory Response from Hydro One**

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We represent Entegrus in its Application to amend its service territory to include the property and industrial customer located at 1 Cosma Court, St. Thomas, Ontario (SAA Application).

On June 22, 2023, parties in this proceeding submitted their Interrogatory Responses (IRRs). Having reviewed the IRRs from Hydro One Networks Inc. (Hydro One), we write to request that Hydro One provide an updated response to one IRR. As described below, the response in issue is very relevant to Entegrus’ position in this proceeding, and it is important that the record be complete on this item. We sought to resolve this item informally with Hydro One, but they have declined to provide the requested updated IRR.

In Entegrus IR #1 to Hydro One, Entegrus including the following preamble and questions (specifically, the first four sub-components of Entegrus IR #1):

**Preamble:**

In 2019, Hydro One provided an email to Entegrus showing the cost of construction of a new Edgeware TS station bus, breaker position and egress to be \$1.7M, within -50% to 100% accuracy. The SAA Application is premised in part on Entegrus’ anticipated future growth requirements for St. Thomas, and the role that the M7/M8 feeders can play in meeting that St. Thomas growth. It is important context, therefore, to understand what other opportunities exist to meet the anticipated requirements.

**Interrogatory:**

If Hydro One is unable to answer any of the following questions, please explain why.

a) Please describe all breaker position slots at Edgeware TS, including:

i. the owner,

- ii. service status (e.g. in service, not constructed, etc.)
  - iii. the rated capacity of each breaker position,
  - iv. the current peak load of each breaker position under normal distribution configuration, and
  - v. if any of the capacity is reserved, please provide an explanation of who the capacity is reserved for and why, as well as the reserve allocation in MW and MVA.
- b) Please describe the remaining open breaker positions not yet built out and any inactive breaker positions at Edgeware TS. Please advise on any allocations or restrictions on the unbuilt or inactive breaker positions.
- (c) Please describe the rationale and objective of the current construction activity at Edgeware TS and whether this activity involves building out or modifying any breaker positions, such as the M11/M12.
- (d) Please confirm whether any construction of new breaker positions at Edgeware TS (e.g. the M11/M12 or other breaker positions) is temporary or permanent. If any breaker position construction is temporary, please confirm when the temporary breaker position will become available again.

Hydro One responded as follows:

Hydro One Distribution has conferred with Hydro One Transmission for the purpose of this interrogatory and was advised as follows:

- a)
- i. Hydro One Transmission is the owner of all breaker positions at Edgeware TS.
  - ii. The standard design of Edgeware TS is set-up with twelve feeder breaker positions. Three of the breaker positions (the M9, M11 and M12) are not constructed. All other breaker positions, M1 to M8, and the M10 are in-service.
  - iii. The typical 27.6kV feeder position capacity is 16.7 MVA.
  - iv. The following are the non-coincidental peak loads for the distribution breakers supplying Hydro One Distribution load: M2: M3: M4: M7 + M8: [redacted]
  - v. There is no contracted capacity at Edgeware TS from Hydro One Transmission.
- b) Currently, there are three unbuilt breaker positions at Edgeware TS. These breaker positions are available to any customer on a first-come, first-served basis in accordance with Hydro One's OEB-approved Transmission Connection Procedures ("TCP").
- c) Hydro One Transmission is working on a sustainment project to replace an end-of-life protection, control and telecom building for the station.

d) Please refer to part (c).

In sum, Hydro One's response indicates that there are three breaker positions remaining at Edgeware TS that have not been built (M9, M11 and M12) and that these are available to any customer on a "first-come, first-served" basis. No suggestion is provided that there are any "allocations or restrictions on the unbuilt or inactive breaker positions", whether temporary or permanent. This is important information for Entegrus. As noted throughout the record, Entegrus will require additional capacity in its St. Thomas service territory. Where this capacity cannot be obtained through the M7 and M8 feeders at issue in this case, then Entegrus will need to get further capacity through Hydro One. The most efficient way to do this is by connecting to an open breaker position at Edgeware TS. If no such capacity is available, then Entegrus will have to construct a new station (or have Hydro One construct or expand a station). This is relevant to the question of why the service area amendment application and treatment of capacity serving the Customer is in the broader public interest.

While the information from Hydro One that there are three breaker positions available at Edgeware TS on a first-come, first first-served basis is encouraging to Entegrus, this information seems to be contradicted by other information on the record. In its response to OEB Staff IR #2 (b), Entegrus indicated the following:

More recently, in 2023, Entegrus met with Hydro One Distribution to discuss significant plans Hydro One had in the St. Thomas region. At that meeting, Entegrus was informed, for the first time, that Hydro One Distribution intended to build out "temporary" Edgeware TS M11 and M12 feeders for an "indefinite" period through a Municipal Consent process. Portions of the associated plan involve running new lines through Entegrus' service territory. These new feeders, if built to the standards of the M7 and M8, would materially reduce capacity at Edgeware TS. Hydro One noted that this "temporary" build out of the M11 and M12 would leave only the M9 available at Edgeware TS for future build out. Entegrus expressed concern about the lack of notification associated with the M11/M12 build out, as Entegrus has typically received advance notifications of such construction. Entegrus understands from review of the IESO website that the M11/M12 construction is now the subject of a 2023-initiated IESO System Impact Assessment process, but the IESO website does not provide any visibility into this process (reference 2023-748 Edgeware TS: Temporary Load Addition).

It is clear therefore that Hydro One Distribution has plans for at least two of the three breaker positions at Edgeware TS. It is difficult to align Hydro One's statement in its response to Entegrus IR #1 (b) that the M11 and M12 breaker positions are "available to any customer on a first-come, first-served basis" with Hydro One's own statement to Entegrus that these breaker positions will be used by Hydro One (and with the SIA process apparently underway with the IESO).

Entegrus requests therefore that Hydro One provide an updated response to Entegrus IR #1 (b). Specifically, Entegrus requests that Hydro One provide complete and up-to-date information about the status of each of the "available" breaker positions (M9, M11 and M12) at Edgeware TS, including whether there are existing requests for service on those breaker positions and what capacity will remain if those requests are successful. Entegrus requests that within this answer, Hydro One answer the clear intent of the original question ("Please advise on any allocations or restrictions on the unbuilt or inactive breaker positions."), which sought to understand future availability limitations on the breaker positions that could reasonably be expected to impact any

ability of Entegrus to get capacity. Additionally, Entegrus requests that Hydro One provide updated responses to Entegrus IR #1 (c) and (d), which ask for details about the current construction activity at Edgeware TS, and how that impacts M11 and M12, and whether and when any temporary use of such breaker positions may end (or not end) such that the M11/M12 breaker positions will/will not be available.

Please let us know if you have questions about this letter.

Yours truly,

AIRD & BERLIS LLP



David Stevens  
DS/

c: All parties registered in EB-2022-0178