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July 12, 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**

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 30, 2023, we wrote to request that Hydro One Networks Inc. (Hydro One) provide an updated response to Entegrus IR #1. In our letter, we set out the wording of the Interrogatory, the response received, and the reasons why the updated response is important,

On July 7, 2023, Hydro One provided a responding letter, declining to provide any update. In Procedural Order No. 4, the OEB provided Entegrus the opportunity to reply.

Stated simply, Hydro One has not provided a complete response to Entegrus IR #1. Nothing in Hydro One’s recent letter leads to a different conclusion.

The information already on the record makes clear that while there are three breaker positions remaining at Edgeware TS that have not been built (M9, M11 and M12), there is an active application or request from Hydro One itself for use of some of the breaker positions. Hydro One must know its own plans related to this application. The information on the IESO website is set out below.

CAA ID & Date	Que...	Applicant	Name	Transmission Zone	Type	Size	Proposed In-Service Date	SIA Status & Report Links
2023-748		HYDRO ONE NETWORKS INC.	Edgeware TS: Temporary Load Addition	West	Load	-	2024-Q1	Active

Entegrus asked for the following information in Entegrus IR #1:

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

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:

a) (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).

This is not responsive. It is clear from Hydro One's statements to Entegrus (see OEB Staff IR #2(b)), as well as from the SIA Application to the IESO, that at least some of the available breaker positions at Edgeware TS are being built out on at least a temporary basis. It may be that there is no contract signed, but that does not mean that the breaker positions at Edgeware TS are truly available on a first-come, first-served basis, nor that no restrictions apply. The fact that Hydro One itself has submitted applications for use of breaker positions suggests that there must be some level of activity or restrictions or plans to be described.

In its Interrogatory request, Entegrus specifically asked:

- whether any of the capacity is "reserved" (with supporting details);
- whether there are any allocations or restrictions on the unbuilt or inactive breaker positions (with supporting details);
- whether any of the construction activity involves building out or modifying breaker positions (with supporting details);
- whether any construction of new breaker positions (including M11 and M12) is temporary or permanent, and if temporary when the breaker position will become available.

Entegrus repeats its request that Hydro One provide a complete response to Entegrus IR#1, including parts (a)(v), (b), (c) and (d), setting out all requested details in relation to the three unbuilt breaker positions at Edgeware TS.

Yours truly,

AIRD & BERLIS LLP



David Stevens
DS/

c: All parties registered in EB-2022-0178