

Larry Richard Interrogatories  
EB-2023-0198

December 5, 2023

**BY EMAIL**

Carla Molina  
Sr. Regulatory Coordinator  
Hydro One Networks Inc.

Dear Ms. Molina:

**Re: Hydro One Networks Inc. Leave to Construct Application  
– Waasigan Project Ontario Energy Board Larry Richard  
Intervenor Interrogatories OEB File Number: EB-2023-0198**

In accordance with Procedural Order No. 2, please find attached my interrogatories for the above proceeding. This document has been sent to the OEB and to all other registered parties to this proceeding.

Hydro One Networks Inc. is reminded that its responses to interrogatories are due by December 15, 2023. Responses to interrogatories, including supporting documentation, must not include personal information unless filed in accordance with rule 9A of the OEB's Rules of Practice and Procedure.

Yours truly,

Larry Richard  
Intervenor

Encl.

## Preamble: Issues 2.1

In January 2023 Hydro One released a preliminary preferred Project route for the Waasigan Transmission Line. To our surprise, it did not include the decommissioned Steep Rock Mine brownfield corridor. Section 2.2 of the Environmental Assessment states the considerations used to develop the chosen route and evaluates several alternative route options. Despite evaluating alternatives in other areas along the proposed alignment, no alternative route was considered between Shabaqua and Atikokan. The Steep Rock Mine brownfield corridor is a decommissioned 30-metre-wide corridor that runs from Thunder Bay to Atikokan. Hydro One requires a 46-metre-wide swath to construct the 230 kV Waasigan corridor. As such an additional 16 metres of land is needed for the Waasigan Transmission Line alignment. The EA further states that crossovers cause reliability issues with the IESO, although there is no further explanation of how or to what extent crossovers cause reliability issues. Given that it costs much less to deforest a 16-metre-wide stretch of forest than it would to deforest a 46-metre-wide stretch of forest, the following questions are designed to demonstrate that the Steep Rock Mine corridor is the most cost-effective route for the Waasigan transmission line.

### Questions:

a) It has been my understanding that considerations for using the Steep Rock Mine Corridor were abandoned earlier in the process because one of the affected traditional territories people demanded a 100-year ban on pesticide use. Please provide the documentation and emails to support this claim. Please provide the minutes of meetings, criteria comparison charts, or score sheets used to evaluate why the Steep Rock Mine brownfield

corridor was not considered the most cost-effective route for the Waasigan Transmission Line project.

b) Please provide the IESO constraints with respect to crossovers.

c) Please provide the associated additional costs per crossover.

d) Please specify the width of the required corridor when not adjacent to the existing corridor.

e) Please provide the length that the Steep Rock corridor travels adjacent to the existing corridor and the length of the Steep Rock corridor that is not adjacent to any existing corridors.

f) Please list the constraints associated with using the Steep Rock corridor as well as mitigating actions that would be required to overcome these constraints, including, crossovers, detours, and potential dispositions to allow the Steep Rock corridor to exist along roadsides and adjacent to the existing corridor with less than the required 46 m corridor width.

g) Please provide the cost of additional crossovers or detours to overcome the constraints identified in answering question f) above.

e) Please provide the area of deforestation required for the construction of the transmission line alignment in the Steep Rock Mine corridor (excluding the Steep Rock Mine corridor brown field)

f) Please provide the area of deforestation required for the construction of the proposed Waasigan transmission line corridor including the land required for the proposed helicopter corridor

- g) Please provide the cost per square kilometre of deforestation
- h) Please provide the cost to deforest the Steep Rock Mine brown field corridor
- i) The proposed Waasigan route at Three Mile Bay is to be constructed on along the side of a hill slope, were the additional costs of building on a slope included in the cost estimate. Are there other slope side areas along the proposed corridor and were these costs included in your proposal.

Preamble: Issue 1.2 & 3.2

The [Ecosystem Services Toolkit](#) was developed to value the costs and impacts of projects that impact ecosystems. Hydro One used this process when developing the alignment from the Bruce Nuclear Generating system to the Milton Switching Station (p. 79 of the Ecosystem Services Toolkit).

Questions:

- a) Did Hydro One use the Ecosystem Services Tool Kit when assessing the costs of the Waasigan Transmission Line, and if not, why not?
- b) If yes to a) what is the valuation of the ecosystems lost and the costs associated with the mitigating actions required to create equivalent habitats to those lost?
- c) Were these costs included in the cost to construct the Waasigan Transmission line?

d) After considering the lost value of ecosystem services as evaluated in b), is the cost associated with using the Steep Rock Corridor expected to be approximately one third the cost associated with Hydro One's preferred route?

#### Preamble: Issue 1.2 & 3.2

The proposed Waasigan Transmission line travels through the Great Lakes Basin Ecosystem. The Ministry of Environment developed the document [Assessing the Economic Value of Protecting the Great Lakes Ecosystems | ontario.ca](#) as a guiding document for assessing the value of ecosystem services and the additional ancillary benefits and costs beyond the preliminary costs of establishing the site. The wetland at the end of Three Mile Bay on Lake Shebandowan is listed as unevaluated, however, given the size of this wetland (approximately 5 hectares), this wetland should be considered provincially significant. Further, the [Ontario Natural Heritage Manual](#) presents the province's recommended technical criteria and approaches in protecting natural heritage features and areas and natural heritage systems in Ontario.

#### Questions:

a) Did Hydro One follow the governing document above and provide a value of the ecosystem services provided in the Great Lakes Basin and identify how these values are affected by the proposed Waasigan Transmission line project. If not, why not? If yes, what was the value of ecosystem services given to this project?

b) Did Hydro One evaluate the wetland at the end of Three Mile Bay or any of the other wetlands or waterways affected by the Waasigan project, and if not, why not?

c) Did Hydro One use the Natural Heritage Manual when developing the Waasigan Project? If not, why not?

d) Has Hydro One included the costs to rehabilitate/restore the wetland area should they cause damage by constructing the hydro corridor? If so, what are the estimated rehabilitation costs? If not, why were these costs not considered?

e) Has Hydro One included the costs of decreased property value based on shoreline aesthetics to the property owners affected by the Waasigan project in their valuations of alternative routes? If so, what is the estimated cost to property owners? If not, why was the loss of value for property owners not considered?

f) Has Hydro One included the costs of decreased property value based on the potential to reduce property value due to loss of recreation from cyanobacteria blooms caused by deforestation near the lake and shoreline wetlands? If so, what are the estimated costs? If not, why were these costs not considered?

g) Has Hydro One included the costs required to respond to and address an increased prevalence of cyanobacteria blooms due to deforestation of the riparian area, particularly along the slope of Three Mile Bay on Lake Shebandowan? If so, what are the estimated costs? If not, why were these costs not considered?

h) Please provide the number of properties affected if the Steep Rock Corridor was implemented and the number of properties affected by the proposed Waasigan Corridor.

i) Why weren't the camp owners of Three Mile Bay on Lake Shebandowan notified or consulted in the selection of the proposed Waasigan corridor and why haven't the property owners been offered a settlement agreement for the decreased property values from the transmission lines adjacent to their properties?