# Service Area Amendment Application Alectra Utilities Corporation

Date: December 21, 2023



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- 1. AREA MAPS
- 2. AERIAL MAP OF AREA
- 3. MAP OF FACILITIES
- 4. ALECTRA UTILITIES' OFFER TO CONNECT
- 5. REQUEST FROM DEVELOPER
- 6. HYDRO ONE NETWORKS INC.LETTER

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#### 7.0 INTRODUCTION

- 2 Alectra Utilities Corporation ("Alectra Utilities" or the "Applicant") is a licensed electricity distributor
- and holds Electricity Distribution License No. ED-2016-0360. In this application (the "Application"),
- 4 Alectra Utilities requests an amendment to its service area, as described in Schedule 1 of the
- 5 Applicant's Distribution License, to include land owned by Multi-Area Developments Inc. (the
- 6 "Customer") and described as Summit Park Phase 9, and located in the City of Hamilton,
- 7 designated as Part of Lot 4, Block 4, Concession 1 of the geographic Township of Binbrook.
- 8 This Application is structured to follow the *Filing Requirements for Service Area Amendments* as
- 9 specified by the Ontario Energy Board ("OEB" or the "Board") in Chapter 7 of the Filing
- 10 Requirements for Transmission and Distribution Applications (the "Filing Requirements"). The
- section numbering follows that of the Filing Requirements.

#### 1 7.1 BASIC FACTS

- 2 **7.1.1**
- 3 Provide the contact information for each of the following persons: Contact information includes
- 4 | the name, postal code, telephone number, and, where available, the email address and fax
- 5 *number of the persons listed below.*
- 6 **7.1.1 (a)**
- 7 The applicant
- 8 Alectra Utilities Corporation
- 9 2185 Derry Road West
- 10 Mississauga, Ontario
- 11 L5N 7A6
- 12 Christine E. Long
- 13 Vice-President, Regulatory Affairs and Privacy Officer
- 14 Telephone: (905) 798-3498
- 15 Email: <u>Christine.Long@alectrautilities.com</u>
- 16 **7.1.1 (b)**
- 17 The incumbent distributor
- 18 Hydro One Networks Inc.
- 19 483 Bay Street, South Tower, 7th Floor
- 20 Toronto, Ontario,
- 21 M5G 2P5
- 22 Mark Ciufo
- 23 Regulatory Analyst, Regulatory Affairs
- 24 Telephone: (416) 345-5905
- 25 Email: regulatory@hydroone.com

1 7.1.1 (c)

- Every affected customer, landowner, and developer in the area that is the subject of the SAA application
- 4 Multi Area Developments Inc. is the only affected customer.
- Multi-Area Developments Inc.
- 7 301 Fruitland Road. Unit 10
- 8 Stoney Creek, Ontario
- 9 L8E 5M1

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- 11 Attention: Mr. Steve Spicer
- 12 Development Manager
- 13 Telephone: (905) 664-2623
- 14 Cell: (905) 577-7403
- 15 Email: spicer@multi-area.com
- 16 **7.1.1 (d)**
- 17 Any alternate distributor other than the applicant and the incumbent distributor, if there are any
- 18 alternate distributors bordering on the area that is the subject of the SAA application
- 19 NOT APPLICABLE
- 20 **7.1.1 (e)**
- 21 Any representative of the persons listed above including, but not limited to, a legal
- 22 representative
- 23 NOT APPLICABLE
- 24 **7.1.2**
- Indicate the reasons why this amendment should occur and identify any load transfers eliminated by the proposed SAA

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- 28 The land that is the subject of this Application is within the service area of Hydro One Networks
- 29 Inc. ("Hydro One") and was part of the lands included in a prior service area amendment
- 30 application (EB-2012-0047).

- 32 In the referenced prior proceeding, Multi-Area Developments Inc., the developer within the area
- of the amendment, had requested that Horizon Utilities Corporation ("Horizon", now part of Alectra
- 34 Utilities) provide an underground electrical distribution system for Parts I through V of a new

development. Horizon had sufficient capacity on its existing distribution facilities bordering the development to supply the proposed load.

 The OEB issued a Decision and Order on March 15, 2013, granting Horizon Parts I through IV of the application. Part V referred to unplanned vacant lands on which an economic analysis could not be performed at the time of application. The Board concluded that the public interest test had not been met due to the lack of an economic analysis and the absence of other extenuating reasons for the amendment and denied Part V of Horizon's application. Horizon and Hydro One have since completed the transfer of all residential and small commercial customers cited in Parts I through IV.

- The lands referred to as Part V in Horizon's prior application are now planned for development. A portion of the Part V lands are described as "Summit Park Phase 9" and are the subject lands of this application. An economic analysis has been completed on the now-planned lands and is included at section 7.2.1(c) of this application. Multi-Area Developments Inc. maintains a preference for Alectra Utilities to provide an underground electrical distribution system for Summit Park Phase 9. Alectra Utilities has sufficient capacity in the immediate area of the development to support the required new connections. Hydro One does not contest this application.
- No increase in rates for either Alectra Utilities' or Hydro One's existing customers will be required; thus, no party is disadvantaged as a result of this proposed amendment for the Applicant to supply the Customers. There are no load transfers involved with this property, therefore, no load transfers are created or eliminated by the proposed service area amendment.

#### DESCRIPTION OF PROPOSED SERVICE AREA

7.1.3

Provide a detailed description of the lands that are the subject of the SAA application. For SAA applications dealing with individual customers, the description of the lands should include the lot number, the concession number, and the municipal address of the lands. The address should include the street number, municipality and/or county, and postal code of the lands. For SAA applications dealing with general expansion areas, the description of the lands should include the lot number and the concession number of the lands, if available, as well as a clear, description of the boundaries of the area (including relevant geographical and geophysical features).

- 1 The legal designation for the subject lands is PCL 4-1, BLK 4, SEC BINBROOK 1; PT LT 4, BLK
- 2 4, CON 1 BINBROOK; SUBJECT TO AN EASEMENT IN GROSS OVER PART 4 AND 16, PLAN
- 3 62R19861 AS IN WE994358; CITY OF HAMILTON being all of PIN 17385-1941 (LT).

- 5 The subject lands are located in the block south of Whistler St, east of Colorado Blvd, west of The
- 6 Crossing Phase 2 development and north of Hydro One transmission corridor. Summit Park
- 7 phase 9 will be constructed along Keystone Crescent (partially), along Steamboat Street and
- 8 Goldpond Avenue.
- 9 See Attachment 1 Area Maps and Attachment 2 Aerial Map of Area.
- 10 **7.1.4**
- 11 Provide one or more maps or diagrams of the area that is the subject of the SAA application.
- 12 The maps or diagrams must identify the following information:
- 13 **7.1.4 (a)**
- 14 The borders of the applicant's service area
- 15 Alectra Utilities' current service area includes Summit Park Phase 8 which abuts the subject area
- of this application immediately to the North and West. The neighboring The Crossings Phase 2
- 17 development, which abuts the subject lands to the East, was the subject of a prior service area
- 18 amendment (EB-2023-0138).
- 19 See Attachment 1 Area Maps.
- 20 **7.1.4 (b)**
- 21 The borders of the incumbent distributor's service area
- 22 See Attachment 1 Area Maps.
- 23 **7.1.4 (c)**
- 24 The borders of any alternate distributor's service area, if applicable
- 25 NOT APPLICABLE
- 26 **7.1.4 (d)**

- 1 The territory surrounding the area for which the applicant is making the SAA application
- 2 See Attachment 1 Area Maps.
- 3 **7.1.4 (e)**
- 4 The geographical and geophysical features of the area including, but not limited to, rivers and
- 5 lakes, property borders, roads, and major public facilities
- 6 See Attachment 2 Aerial Map of Area.
- 7 **7.1.4 (f)**
- 8 The existing facilities supplying the area that is the subject of the SAA application, if applicable,
- 9 as well as the proposed facilities which will be utilized by the applicant to supply the area that is
- 10 the subject of the SAA application (Note: if the proposed facilities will be utilized to also provide
- 11 for expansion of load in the area that is the subject of the SAA application, identify that as well)
- 12 Alectra Utilities has a 27.6 kV feeder with enough capacity immediately adjacent to the subject
- area of this Application. Currently, there are no existing Hydro One facilities in the area capable
- of supplying the Customer. The nearest Hydro One asset is located approximately 400 meters
- 15 away. Hydro One has 27.6 kV feeder running along the south side of Rymal Road East.
- Alectra Utilities will be installing: 8 100 kVA, 16.0kV 240/120V transformers and foundations;
- approximately 1,100 meters of 28kV 2/0 Al primary cables; Approximately 3,800 meters of 3/0 al
- 18 secondary cables; approximately 4,500 meters of 100mm PVC BD secondary ducts;
- approximately 1,300 meters of 100mm PVC CE primary ducts.
- 20 See Attachment 3 Map of Facilities.
- 21 DISTRIBUTION INFRASTRUCTURE IN AND AROUND THE PROPOSED AMENDMENT
- 22 AREA
- 23 **7.1.5**
- 24 Provide a description of the proposed type of physical connection (i.e., individual customer,
- 25 | residential subdivision commercial or industrial development, or general service area
- 26 expansion)
- 27 Summit Park is a primarily residential subdivision. Phase 9 includes 91 residential lots, a mixture
- 28 of detached homes and townhouses. A service connection will be made to each lot.

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- Provide a description of the applicant's plans, if any, for similar expansions in lands adjacent to 2 the area that is the subject of the SAA application. Provide a map or diagram showing the lands 3
- 4 where expansions are planned in relation to the area that is the subject of the SAA application
- 6 To the east, there are lands adjacent to the subject area that have not been developed but have
- 7 been approved for development under Site Development Plan 25T-201309.
- 8 See Attachment 1 – Area Maps.

#### 7.2 EFFICIENT RATIONALIZATION OF THE DISTRIBUTION SYSTEM

- 10 7.2.1
- 11 In light of the above, provide a comparison of the economic and engineering efficiency for the
- applicant and the incumbent distributor to serve the area that is the subject of the SAA 12
- 13 application. The comparison must include the following
- 7.2.1 (a) 14
- 15 The location of the point of delivery and the point of connection
- 16 Alectra Utilities has a 27.6 kV feeder running adjacent to Rymal Road immediately north of the
- 17 subject property. Alectra has an existing pad-mounted switchgear along the north side of the
- 18 property on Bellagio Avenue. The points of connection will be existing pad-mounted transformers
- located at Colorado Boulevard, Whistler Street and Bonhill Boulevard. 19
- See Attachment 3 Map of Facilities. 20
- 21 7.2.1 (b)
- The proximity of the proposed connection to an existing, well-developed electricity distribution 22
- system 23
- The connections are in very close proximity to the existing Alectra distribution systems. One 24
- 25 connection point is approximately 70 meters from the subject development to the transformer at
- Colorado Boulevard, the second connection point is approximately 40 meters from the subject 26
- 27 development at Whistler Street and the third connection point is approximately 20 meters from
- the subject development at Bonhill Boulevard. 28

1 **7.2.1 (c)** 

- 2 The fully allocated connection costs for supplying the customer (i.e., individual customers or
- 3 developers) unless the applicant and the incumbent distributor provide a reason why providing
- 4 the fully allocated connection cost is unnecessary for the proposed SAA (Note: the Board will
- 5 determine if the reason provided is acceptable)
- 6 Alectra Utilities' fully allocated connection costs for supplying Summit Park Phase 9 is estimated
- 7 at \$1,100,000.
- 8 **7.2.1 (d)**
- 9 The amount of any capital contribution required from the customer
- 10 All connection costs are paid by the Customer and based on fully allocated costs
- 11 **7.2.1 (e)**
- 12 The costs for stranded equipment (i.e., lines, cables, and transformers) that would need to be
- 13 de-energized or removed
- 14 There would not be any stranded assets in need of removal or de-energization.
- 15 **7.2.1 (f)**
- 16 Information on whether the proposed SAA enhances, or at a minimum does not decrease, the
- 17 | reliability of the infrastructure in the area that is the subject of the SAA application and in regions
- 18 | adjacent to the area that is the subject of the SAA application over the long term
- 19 There will not be a negative impact to reliability of the infrastructure in the area that is the subject
- 20 of this Application or in the regions adjacent to the area that is the subject of the Application over
- 21 the long term.
- 22 **7.2.1 (g)**
- 23 Information on whether the proposed infrastructure will provide for cost-efficient expansion if
- 24 | there is growth potential in the area that is the subject of the SAA application and in regions
- adjacent to the area that is the subject of the SAA application
- There is growth potential in the area surrounding the land that is the subject of this Application.
- 27 This growth potential can be accommodated in a cost-efficient manner by Alectra Utilities' existing
- 28 underground infrastructure. The Applicant would not have to expand its existing infrastructure to
- 29 supply this area, should future phases be developed.

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31 **7.2.1 (h)** 

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Information on whether the proposed infrastructure will provide for cost-efficient improvements and upgrades in the area that is the subject of the SAA application and in regions adjacent to the area that is the subject of the SAA application

- 5 The infrastructure needed to supply the subject development is the existing 27.6 kV underground
- 6 distribution feeder within Alectra Utilities' plant. There is no need for any additional proposed
- 7 infrastructure to service this connection. Moreover, the proposed amendment will improve the
- 8 contiguous density of the Applicant's service territory.

#### 7.3 IMPACTS ARISING FROM THE PROPOSED AMENDMENT

#### 10 **DESCRIPTION OF IMPACTS**

- 11 **7.3.1**
- 12 Identify any affected customers or landowners
- 13 See Section 7.1.1 (c) above.
- 14 **7.3.2**
- 15 Provide a description of any impacts on costs, rates, service quality, and reliability for customers
- in the area that is the subject of the SAA application that arise as a result of the proposed SAA.
- 17 If an assessment of service quality and reliability impacts cannot be provided, explain why.
- 18 There are no impacts on costs or rates for customers in the area that is the subject of the
- 19 Application or that arise as a result of the proposed service area amendment.
- 20 7.3.3
- 21 Provide a description of any impacts on costs, rates, service quality, and reliability for customers
- 22 of any distributor outside the area that is the subject of the SAA application that arise as a result
- 23 of the proposed SAA. If an assessment of service quality and reliability impacts cannot be
- 24 provided, explain why.
- 25 There are no impacts on costs, rates, service quality, or reliability for customers of any distributor
- outside the area that is the subject of the Application or that arise as a result of the proposed
- 27 service area amendment.
- 28 **7.3.4**

- 1 Provide a description of the impacts on each distributor involved in the proposed SAA. If these
- 2 | impacts have already been described elsewhere in the application, providing cross-references is
- 3 acceptable
- 4 There are no impacts on Alectra Utilities because there is an existing feeder adjacent to this
- 5 property with ample capacity to supply this development. The additional revenue from the new
- 6 customers will have a marginal favorable impact for Alectra, without any adverse impacts to
- 7 reliability or customer service.
- 8 7.3.5
- 9 Provide a description of any assets which may be stranded or become redundant if the
- 10 proposed SAA is granted
- 11 There will be no stranded or redundant assets resulting from this service area amendment.
- 12 **7.3.6**
- 13 Identify any assets that are proposed to be transferred to or from the applicant. If an asset
- 14 transfer is required, has the relevant application been filed in accordance with section 86 of the
- 15 Act? If not, indicate when the applicant will be filing the relevant section 86 application
- 16 There is no requirement to transfer any assets.
- 17 **7.3.7**
- 18 Identify any customers that are proposed to be transferred to or from the applicant
- 19 See Section 7.1.3
- 20 **7.3.8**
- 21 Provide a description of any existing load transfers or retail points of supply that will be
- 22 eliminated
- 23 There are no existing load transfers or retail points of supply that will be eliminated.
- 24 **7.3.9**
- 25 Identify any new load transfers or retail points of supply that will be created as a result of the
- 26 proposed SAA. If a new load transfer will be created, has the applicant requested leave of the
- 27 | Board in accordance with section 6.5.5 of the Distribution System Code ("DSC")? If not, indicate
- 28 when the applicant will be filing its request for leave under section 6.5.5 of the DSC with the
- 29 Board. If a new retail point of supply will be created, does the host distributor (i.e., the distributor
- 30 | who provides electricity to an embedded distributor) have an applicable Board approved rate? If

- 1 not, indicate when the host distributor will be filing an application for the applicable rate.
- 2 Evidence of Consideration and Mitigation of Impacts
- 3 There will be no new load transfers or retail points of supply created as a result of this Application.
- 4 7.3.10
- 5 Provide written confirmation by the applicant that all affected persons have been provided with
- 6 specific and factual information about the proposed SAA. As part of the written confirmation, the
- 7 | applicant must include details of any communications or consultations that may have occurred
- 8 between distributors regarding the proposed SAA
- 9 The developer, Multi-Area Developments Inc., is the only customer affected by this Application.
- 10 See Attachment 4 Request from Developer.
- 11 **7.3.11**
- 12 Provide a letter from the incumbent distributor in which the incumbent distributor indicates that it
- 13 consents to the application.
- 14 A letter indicating the consent of Hydro One is provided as Attachment 5.
- 15 **7.3.12**
- 16 Provide a written response from all affected customers, developers, and landowners consenting
- 17 to the application, if applicable
- 18 The request from the developer is provided as Attachment 4, as evidence of the Customer's
- 19 support of this application.
- 20 7.3.13
- 21 Provide evidence of attempts to mitigate impacts where customer and/or asset transfers are
- 22 involved (i.e., customer rate smoothing or mitigation, and compensation for any stranded
- 23 assets).

- 24 NOT APPLICABLE
  - 7.4 CUSTOMER PREFERENCE
- 26 The Board, in the RP-2003-0044 decision, stated that customer preference is an important, but
- 27 | not overriding consideration when assessing the merits of an SAA.

#### 1 **7.4.1**

- 2 An applicant who brings forward an application where customer choice may be a factor must
- 3 provide a written statement signed by the customer (which includes landowners and
- 4 developers) indicating the customer's preference.
- 5 The request from the Customer is provided as Attachment 4, as evidence of the Customer's
- 6 preference to proceed with Alectra Utilities as the electrical distributor.

#### 7 7.5 ADDITIONAL INFORMATION REQUIREMENTS FOR CONTESTED APPLICATIONS

- 8 Alectra Utilities has not completed Section 7.5 of this SAA Application as this is not a contested
- 9 Application. Hydro One has provided its consent to this SAA, as shown in the attached letter of
- 10 consent, included herewith in Attachment 5.
- 11 If there is no agreement among affected persons regarding the proposed SAA, the applicant
- 12 must file the additional information set out below.
- 13 NOT APPLICABLE
- 14 **7.5.1**
- 15 If the application was initiated due to an interest in service by a customer, landowner, or
- 16 developer, evidence that the incumbent distributor was provided an opportunity to make an offer
- 17 to connect that customer, landowner, or developer.
- 18 NOT APPLICABLE.
- 19 **7.5.2**
- 20 Evidence that the customer, landowner, or developer had the opportunity to obtain an offer to
- 21 connect from the applicant and any alternate distributor bordering on the area that is the subject
- 22 of the SAA application.
- 23 NOT APPLICABLE.
- 24 **7.5.3**
- 25 Actual copies of, as well as a summary of, the offer(s) to connect documentation (including any
- 26 associated financial evaluations carried out in accordance with Appendix B of the Distribution
- 27 System Code). The financial evaluations should indicate costs associated with the connection
- 28 including, but not limited to, on-site capital, capital required to extend the distribution system to
- 29 the customer location, incremental up-stream capital investment required to serve the load, the

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- 1 present value of incremental OM&A costs and incremental taxes as well as the expected
- 2 incremental revenue, the amount of revenue shortfall, and the capital contribution requested.
- 3 NOT APPLICABLE.
- **4 7.5.4**
- 5 | If there are competing offers to connect, a comparison of the competing offers to connect the
- 6 customer, landowner, or developer.
- 7 NOT APPLICABLE.
- 8 **7.5.5**
- 9 A detailed comparison of the new or upgraded electrical infrastructure necessary for each
- distributor to serve the area that is the subject of the SAA application, including any specific
- 11 proposed connections.
- 12 NOT APPLICABLE.
- 13 **7.5.6**
- 14 Outage statistics or, if outage statistics are not available, any other information regarding the
- 15 | reliability of the existing line(s) of each distributor that are proposed to supply the area that is the
- 16 subject of the SAA application.
- 17 NOT APPLICABLE.
- 18 **7.5.7**
- 19 Quantitative evidence of quality and reliability of service for each distributor for similar
- 20 customers in comparable locations and densities to the area that is the subject of the SAA
- 21 application.
- 22 NOT APPLICABE.

#### 23 METHOD OF DISPOSITION

- 24 The applicant would ask that this matter be disposed of without a hearing, pursuant to subsection
- 25 21(4) of the Ontario Energy Board Act, 1998 as Hydro One has consented to Alectra Utilities'
- proposed service area amendment as shown in Attachment 5.

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CONCLUSION

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2 The evidence filed with this Application confirms that it is economically efficient for Alectra Utilities

3 to serve the proposed development. Summit Park Phase 9 is a natural extension to the Applicant's

4 existing urban distribution system. Alectra Utilities already serves much of the neighboring

territories and has surplus capacity on existing 27.6 kV circuits that are contiguous to the Phase

6 9 development. The Applicant has sufficient capacity on its existing distribution facilities bordering

7 the development to supply the proposed load for the new development and the proposed

8 amendment will favourably affect the contiguous density of the Applicant's service territory. No

increase in rates for either Alectra Utilities' or Hydro One's existing customers will be required to

10 service the proposed development as a result of this Application. Therefore, Alectra Utilities

requests the Board grant approval for this service area amendment.

All of which is respectfully submitted this 21 day of December 2023.

Christine E. Long

Chastine E. dong)

Vice-President, Regulatory Affairs

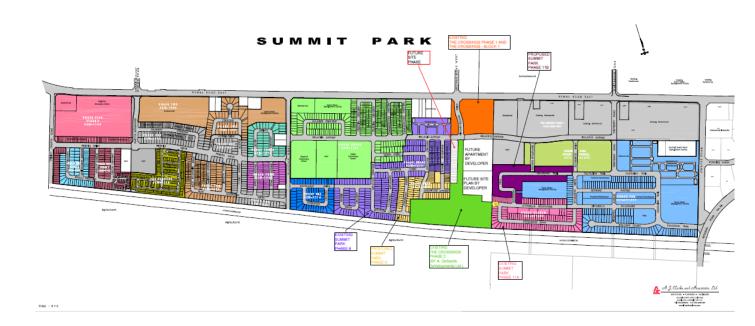
Telephone: (905) 798-3498

Email: RegulatoryAffairs@alectrautilities.com

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# **Attachment 1**

**Area Maps** 



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## **Attachment 2**

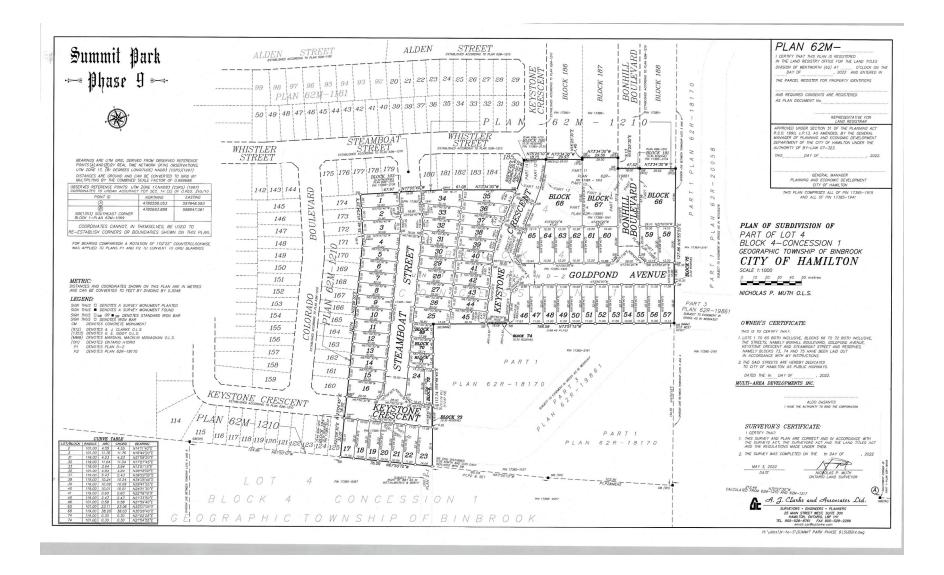
**Aerial Map of Area** 



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## **Attachment 3**

**Map of Facilities** 



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## **Attachment 4**

**Request from Developer** 

September 18, 2023

Attn: Mr. Goran Velickovski Manager, Capital Projects Alectra Utilities Corporation P.O. Box 2249 Station LCD 1 Hamilton, ON L8N 3E4

Dear Goran,

**RE: Request for Electrical Supply** 

PART OF LOT 4
BLOCK 4—CONCESSION 1
GEOGRAPHIC TOWNSHIP OF BINBROOK
CITY OF HAMILTON

This letter will confirm the request of Multi-Area Developments Inc. to Alectra Utilities Corporation for the supply of electricity to lands known as Summit Park Phase 9 which is part of the draft approved subdivision, City of Hamilton file No. 25T-200208. The construction of homes is scheduled to start in the spring of 2025. The servicing of the site should be at a stage where utility installations may begin in the September of 2024.

Multi-Area Developments Inc. supports Alectra Utilities Corporation's intention to proceed with a Service Area Amendment application to the Ontario Energy Board without a hearing. We understand that Hydro One Networks Inc. is aware of this request for a Service Area Amendment.

We hereby request Alectra Utilities Corporation to provide us with an offer to connect as soon as possible.

Should you require any additional information, please contact me at your convenience.

Sincerely,

Steve Spicer
Development Manager

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## **Attachment 5**

**Hydro One Networks Inc. Letter** 



Hydro One Networks Inc.

483 Bay Street 7th Floor South Tower Toronto, Ontario MSG 2P5 HydroOne.com

Joanne Richardson Director, Major Projects and Partnerships

C 416.902.4326 Joanne.Richardson@HydroOne.com

BY EMAIL

December 18, 2023

Alectra Utilities Corporation c/o Christine E. Long Vice-President, Regulatory Affairs 2185 Derry Road West Mississauga, Ontario L5N 7A6

Dear Ms. Long,

Alectra Utilities Corporation Application for a Service Area Amendment – Hydro One Networks Inc.
Consent Letter

This is to confirm that Hydro One Networks Inc. ("Hydro One") supports your application to amend Alectra Utilities Corporation ("Alectra") Distribution Licence as proposed in Alectra's service area amendment ("SAA") application. The intent of the application is to amend Alectra's distribution licence to include the property legally described as follows in the SAA application:

Summit Park Phase 9:

PCL 4-1, BLK 4, SEC BINBROOK 1; PT LT 4, BLK 4, CON 1 BINBROOK; SUBJECT TO AN EASEMENT IN GROSS OVER PART 4 AND 16, PLAN 62R19861 AS IN WE994358; CITY OF HAMILTON being all of PIN 17385-1941 (LT).

Hydro One also supports Alectra's request to proceed with this SAA without a hearing. If you have any questions or concerns, please contact Mark Ciufo at Mark.Ciufo@HydroOne.com or alternatively, via telephone, at 416-345-5905.

Sincerely,

Joanne Richardson

cc. Abdul Hussaini, Hydro One Networks Inc.