

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15. Schedule B, as amended (the “**Act**”);

IN THE MATTER OF an Application by Hydro One Networks Inc. (“**HONI**”) pursuant to sections 92, 96.1, and 97 of the Act for an Order or Orders granting leave to construct approximately 64 kilometres of electricity transmission line and associated facilities from Lambton Transformer Station, connecting Wallaceburg Transformer Station, and terminating at Chatham Switching Station in the West of London area.

AND IN THE MATTER OF an Application by Hydro One Networks Inc. for approval of the form of land-use agreements offered or to be offered to affected landowners:

WRITTEN INTERROGATORIES FROM THE ROSS FIRM GROUP

Pursuant to the OEB’s Procedural Order No. 1 dated July 31, 2024, the Ross Firm Group submits the following interrogatories:

PART II: Project Alternatives

1. Assessment of Project Alternatives

Ref. #2: EB-2024-0155 – Hydro One Networks Inc. Leave to Construct Application – Lambton to Chatham Transmission Line Project, EXHIBIT B, TAB 5, SCHEDULE 1.

- a. Please provide detailed analysis and comparison of any alternative solutions that were considered, including series capacitor alternatives, distribution solutions, or other transmission solutions. Why was the proposed project selected as the preferred option?
- b. Was the route selected by HONI the least expensive alternative?
 - i. If not, what is the budget difference between the selected route and the least expensive alternative?
 - ii. Is the selection of the preferred route as opposed to the least expensive alternative based on the Class EA findings?
 1. If so, how does HONI reconcile the increased cost to rate payers with the environmental considerations?

PART III: Project Cost

2. Cost Estimates and Reasonableness

Ref. #3: EB-2024-0155 – Hydro One Networks Inc. Leave to Construct Application – Lambton to Chatham Transmission Line Project, EXHIBIT B, TAB 7, SCHEDULE 1.

- a. Has Hydro One provided sufficient information to demonstrate that the estimates of the project cost are reasonable?
- b. How do these cost estimates compare to other similar projects undertaken by Hydro One or comparable projects elsewhere?
- c. Are the proxies used for comparison appropriate and sufficient for this Project?

3. Risk Identification and Contingency Budget

Ref. #4: EB-2024-0155 – Hydro One Networks Inc. Leave to Construct Application – Lambton to Chatham Transmission Line Project, EXHIBIT B, TAB 7, SCHEDULE 1.

- a. Please identify and describe any risks associated with the project, including:
 - i. Technical risks
 - ii. Environmental risks
 - iii. Financial risks.
- b. Is the proposed contingency budget appropriate and consistent with these identified risks?

PART IV: Customer Impacts

4. Capital Contributions

Ref. #5: EB-2024-0155 – Hydro One Networks Inc. Leave to Construct Application – Lambton to Chatham Transmission Line Project, EXHIBIT B, TAB 9, SCHEDULE 1.

- a. Has Hydro One correctly determined the need for and the amount of any capital contributions required for the project? Please provide detailed calculations and justifications for any contributions identified.

5. Transmission Rate Impacts

Ref. #6: EB-2024-0155 – Hydro One Networks Inc. Leave to Construct Application – Lambton to Chatham Transmission Line Project, EXHIBIT B, TAB 9, SCHEDULE 1.

- a. What are the projected transmission rate impacts resulting from the project?
- b. Are these impacts reasonable given the needs the project satisfies and the benefits it provides?

PART V: Reliability and Quality of Electricity Service

6. Impact on Reliability

Ref. #7: EB-2024-0155 – Hydro One Networks Inc. Leave to Construct Application – Lambton to Chatham Transmission Line Project, EXHIBIT F, TAB 1, SCHEDULE 1.

- a. Has Hydro One established that the project will maintain or improve reliability? Please provide the final System Impact Assessment (SIA) and explain its findings regarding the project's impact on the reliability of the integrated power system.

7. Customer Impact Assessment (CIA)

Ref. #9: EB-2024-0155 – Hydro One Networks Inc. Leave to Construct Application – Lambton to Chatham Transmission Line Project, EXHIBIT G, TAB 1, SCHEDULE 1.

- a. Please provide the final Customer Impact Assessment (CIA). Does the final CIA conclude that the project will not have an adverse impact on customers with respect to reliability and quality of electricity service?

PART VI: Route Map and Form of Landowner Agreements

8. Scope of Easement Language

Ref. #10: EB-2024-0155 – Hydro One Networks Inc. Leave to Construct Application – Lambton to Chatham Transmission Line Project, EXHIBIT E, TAB 1, SCHEDULE 1 – Form of Transfer and Grant of Easement.

- a. The Ross Firm Group has previously raised concerns regarding the broad scope of the easement language proposed by Hydro One. Please clarify the specific rights Hydro One intends to exercise under this easement, particularly regarding:
 - i. Access rights for maintenance, repair, and emergency purposes
 - ii. Restrictions on landowners' use of the land within the easement area
 - iii. Provisions for compensation for any business or property loss resulting from Hydro One's use of the easement.
- b. Under the current Application for Leave to Construct, the scope of easement language would reasonably be limited to those steps required to enter upon, prepare, construct and maintain the new project during its serviceable life. However, the grant language proposed by HONI includes: "add to, enlarge, alter... move, remove, replace, reinstall, reconstruct, relocate, supplement...". Is this scope of grant necessary or appropriate for the project approval being applied for?
- c. Further to b. above, is it the Applicant's position that should further works on the easement lands, unrelated to the current project, or for which subsequent regulatory approval would be required, be undertaken, all necessary compensation and consultation has been satisfied by the grant of easement and compensation paid under the current Application?
- d. Further to b. above, the grant provides for the addition of 'telecommunications systems...' which not only supports the proposed project, but expands to "a related business venture".
 - i. Please provide details of related business ventures.
 - ii. Please provide details of the economic models for those related business ventures, including revenue potential, operational costs, types of related business ventures.
 - iii. Please provide details of the authority the OEB has to grant approval for this additional and apparently unrelated component of the construction contemplated by the Applicant.
 - iv. Please provide details of the compensation landowners will receive from these related business ventures, as leave to construct sought and the consequent authority to expropriate relates to the proposed project that is the subject of this Application and not peripheral revenue generating activities contemplated by the Applicant.
- e. Are there any circumstances under which Hydro One would agree to limit or condition its easement rights?

9. Impact on Agricultural Operations

Ref. #11: EB-2024-0155 – Hydro One Networks Inc. Leave to Construct Application – Lambton to Chatham Transmission Line Project, EXHIBIT E, TAB 2, SCHEDULE 1.

- a. Given that some of the affected properties are used for agricultural purposes, how does Hydro One intend to mitigate potential disruptions to farming activities during both the construction and operational phases of the project?
- b. What post construction provisions will be made for compensating landowners for any loss of crop production, additional operational costs, or other agricultural impacts caused by the project?
- c. What decommissioning plans (e.g. removal of HONI infrastructure) exist for the point in time the project or facilities are no longer necessary.
- d. What is the budget attributed to decommissioning the project?

PART VII: Environmental and Community Impact

10. Environmental Assessment and Mitigation Measures

Ref. #12: EB-2024-0155 – Hydro One Networks Inc. Leave to Construct Application – Lambton to Chatham Transmission Line Project, Environmental Study Report (ESR), EXHIBIT F, TAB 1, SCHEDULE 1.

- a. Hydro One has completed an Environmental Assessment (EA) for the project. Please provide an overview of the key findings of the EA and how Hydro One plans to address any identified environmental concerns.
- b. What specific mitigation measures will Hydro One implement to minimize the environmental impact during the construction and operational phases?

11. Community and Stakeholder Engagement

Ref. #13: EB-2024-0155 – Hydro One Networks Inc. Leave to Construct Application – Lambton to Chatham Transmission Line Project, EXHIBIT G, TAB 2, SCHEDULE 1.

- a. What ongoing engagement and communication strategies will Hydro One employ to keep stakeholders informed and address their concerns as the project progresses?

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