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July 22, 2025

**EB-2024-0115 Hydro Ottawa 2026-2030 Custom Rate Application**

**CAFES Ottawa Interrogatories to Applicant**

Dear Mr. Murray

In accordance with OEB direction, please find attached CAFES Ottawa's interrogatories to the Applicant. The following appendices have been filed in parallel.

- CAFESOttawa_IR_AppendixA_HydroOttawaLetter_20250722

Respectfully submitted on behalf of CAFES Ottawa.

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Cc: All Parties (via email)
Angela Keller-Herzog, CAFES Ottawa (via email)

**EB-2024-0115**

**ONTARIO ENERGY BOARD**

**Hydro Ottawa**

**2026-2030 Cost of Service**

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# CAFES OTTAWA INTERROGATORIES

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**July 22, 2025**


**Submitted by:** **Michael Brophy**

**Michael Brophy Consulting Inc.**

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**Phone: 647-330-1217**

**28 Macnaughton Road**

**Toronto, Ontario M4G 3H4**

1-CO-1

Reference: The utility is a subsidiary of Hydro Ottawa Holding Inc., which is 100% owned by the City of Ottawa and governed by an independent Board of Directors. [1/2/3, page 6]

a) Please provide the names of those that sit on the Hydro Ottawa Holding Inc. Board of Directors and indicate against each person note if they are independent.

b) Please provide the names of those that sit on the Hydro Ottawa Limited Board of Directors and indicate against each person if they are independent.

c) Please explain the difference between Hydro Ottawa Holding Inc. and Hydro Ottawa Limited, also providing an organisation chart showing their relationship.

d) Please confirm that it is Hydro Ottawa Limited (HOL) that provides direction to the regulated monopoly distributor Hydro Ottawa and not Hydro Ottawa Limited. If this is not correct, please explain.

e) Please explain how Hydro Ottawa Holding Inc. and Hydro Ottawa Limited each receive direction from its sole shareholder, the City of Ottawa.

f) Has Hydro Ottawa (including any of its parent structure) received direction from the City of Ottawa to ensure distribution planning and delivery align with net zero by 2050 objectives? If yes, please provide a copy of those materials.

g) Please indicate which Board approved the Hydro Ottawa investment plan and whether it was also presented to the other Hydro Ottawa Board and/or approved by the City of Ottawa.

h) In the June 25, 2025 presentation to Council, Hydro Ottawa indicated that 87% of citizens support the proposed rate increase. Please provide the evidence reference that matches this value and the materials provided to Council.

1-CO-2

a) Please provide details on Hydro Ottawa's (including affiliates) involvement with the Ottawa Hospital's New Civic Campus, including investments, services and programs.

b) Does the energy plan for the new Ottawa hospital include building a natural gas power plant? Was feasibility of sustainable alternatives studied? If yes, please provide. If no, why not.

1-CO-3

Reference: [1/2/3, page 12]

Table 2 - Annual Increases in Customer Connections[6]

| | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 |
|---|---|---|---|---|---|---|---|---|
| New Customers | 3,970 | 3,897 | 3,543 | 4,451 | 6,576 | 6,968 | 5,586 | 5,496 |

Please recreate Table 2 with a row indicating what the annual customer increase represents compared to the total number of customers at the start of that year. Please also add columns for 2024 to 2030. Where a number is an estimate rather than an actual, please note it with a footnote.

1-CO-4

Reference: CAFESOttawa_IR_AppendixA_HydroOttawaLetter_20250722

a) please explain why Hydro Ottawa is not planning to support full electrification if this is required to achieve net zero by 2050 in alignment with the City of Ottawa's Energy Evolution Plan.

b) Please provide a copy of all "electrification scenarios" developed by Hydro Ottawa and please explain how Hydro Ottawa selected the scenario that limits customer electrification.

c) Please identify any renewable generation or battery storage options considered in Hydro Ottawa's "electrification scenarios" and explain why this could not be used to support greater electrification in support of net zero by 2050 objectives.

d) Has Hydro Ottawa developed an investment plan option to support full electrification? If not, why not. If yes, please provide a copy.

e) Has the City of Ottawa provided any direction to Hydro Ottawa to consider or deliver electrification of space heating beyond the 76% level targeted by Hydro Ottawa. If yes, please provide a copy of all such records.

1-CO-5

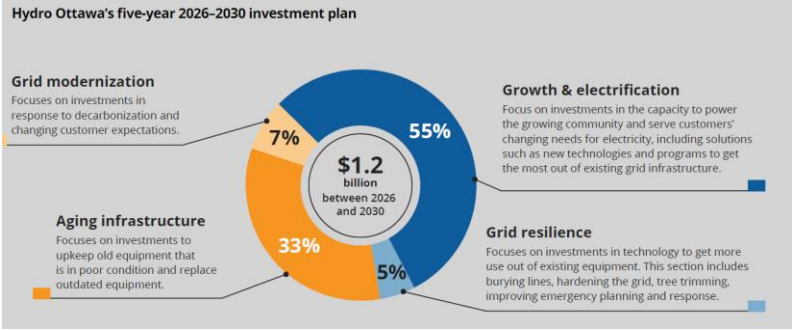
Please detail what Hydro Ottawa has been doing and intends to do (over the rate term) to increase awareness and use of net metering, including for potential community projects.

1-CO-6

The recent Toronto Hydro 2025-2029 application that has been OEB approved has much lower bill increases (1.9% - 2.5% per EB-2023-0195 dec_order_Partial_THESL_20241112, page 1) compared to the Hydro Ottawa proposal (4.94% - 17.62% per 1/2/1 Attachment page 4). One of the reasons provided for the lower increase by Toronto Hydro is that past rate terms provided the foundation to deliver system requirement, including those to enable net zero by 2050. This required less incremental investment now. Please explain why such a stark increase is required by Hydro Ottawa.

1-CO-7

Reference: Customer Summary Diagram [1/2/1 Attachment, page 2]




a) The largest portion of Hydro Ottawa's investment plan relates to "growth and electrification". Please explain why these significant investments (including overspending in the 2021-2025 term) will not enable a full electrification scenario.

b) Please provide a table indicating the investments per year over the rate term proposed under each of the four categories noted above. Please include a row or column that indicates what percentage each is related to the 2026-2030 investment plan.

c) Please explain why the Grid Modernization focus above is such a small percentage of the plan.

1-CO-8

a) Please provide any analysis and reports created to assess the potential impact of tariffs on Capital and/or OM&A costs over the rate term.

b) Please explain how Hydro Ottawa is proposing to separate normal fluctuations (e.g. currency, inflation, supply/demand cost changes, etc.) from real tariff impacts?

1-CO-9

Reference: 49% report encountering two or more outages in the past 12 months, surpassing the Ontario average of 37% and the national average of 44%. [1/4/1 Attachment E, page 59] and Hydro Ottawa Scorecard [1/3/3, page 15, Table 4]

Pleas reconcile this high rate of customer outages with the positive scorecard results shown in the Hydro Ottawa scorecard.

1-CO-10

Reference: BTM Survey [1/4/1 Attachment F]

a) Please provide the definition of "Behind the Meter" used in the survey.

b) Was a solar and battery option like what is incented through the Ontario eDSM programs included as an option for BTM in the survey? If not, why not.

1-CO-11

Please provide details on the innovative approaches Hydro Ottawa could leverage to promote clean energy solutions aligned with the energy transition. For example, is Hydro Ottawa willing to avoid charges related to installation of heat pumps and EV chargers?

1-CO-12

Reference: Ottawa Retrofit Accelerator (Ottawa Retrofit Accelerator | Hydro Ottawa)

a) Please provide a summary of the Ottawa Retrofit Accelerator program as offered on the Hydro Ottawa website referenced above.

b) Please provide details on the following results achieved (per year since inception) by the program for buildings in Hydro Ottawa's service territory.
   - Number of buildings assessed
   - Energy savings identified
   - Energy savings achieved
   - Customer incentives provided

c) Please confirm that maximizing program results aligns with City of Ottawa energy and emission goals.

d) Please provide details on how Hydro Ottawa could maximize program results before the program funding ends at the end of 2027.

2-CO-13

Reference: Figure 1 - SAIDI & SAIFI - Annual and 5-Year Average (Excluding Loss of Supply and Major Event Days) [2/5/1, page 36]

a) Please provide an updated version of Figure 1 including 2024 actuals.

b) Please provide the SAIDI & SAIFI graphs including Loss of Supply and Major Event Days. If possible, please add this to the graph in part a above. However, if it is not possible to show both on the same graph, a separate graph may need to be generated.

c) Please provide the definition Hydro Ottawa uses to define “Loss of Supply” and a “Major Event Day” for purposes of excluding data from SAIDI & SAIFI reporting. Please explain how this definition conforms to OEB requirements and current practice from peers, such as Toronto Hydro.

d) Please describe the process Hydro Ottawa uses to remove the Loss of Supply and Major Event Days data from the SAIDI & SAIFI dataset. What process is used to ensure that more/less data is not removed/added if an outage happens close to an event that is defined as Loss of Supply or a Major Event Day.

2-CO-14

Hydro Ottawa spends significant effort in its application to provide materials related to the 2022 Derecho event.

a) Please provide any analysis, reports, presentations or other related materials that compare the Derecho event to average events over the longer term (e.g. previous 10-20 years) that has occurred in Ottawa Hydro’s service territory.

b) Please provide any statistical analysis that Hydro Ottawa has available on the probability of an event like the Derecho evet will occur in any single year in Ottawa Hydro’s service territory.

c) Please provide details on how Hydro Ottawa has applied the information requested in parts a & b above to the future focused 2026-2030 rate term.

d) Please explain how tools like insurance are used to manage storm event risks compared to using ratepayer costs to fully cover those events.

2-CO-15

a) Please explain the process Hydro Ottawa uses to receive and address reliability and system outage customer complaints escalated through City of Ottawa, including Councillors and the Mayor's office.

b) Please provide a copy of reliability and system outage customer complaints received from City of Ottawa (including Councillors and the Mayor's office) for 2021 through 2024. If the number is significant, please use a summary table.

2-CO-16

a) Please provide details on how redundancies are applied for existing or future building that are critical infrastructure such as hospitals?

b) Please provide details on if/how Hydro Ottawa tracks multi-story dwellings with vulnerable residents dependent on elevators for mobility and electricity for medical purposes.

2-CO-17

Reference: Hydro Ottawa is utilizing the Decarbonization Study's Reference Scenario forecast to inform its Integrated Regional Resource Plan (IRRP) forecast. This alignment is crucial for long-term regional transmission planning, given the extended lead times of transmission grid investments. [2/5/1, page 49]

a) Please confirm that the assumptions Hydro Ottawa has input into the Regional Planning process include the necessary actions to support net zero by 2050 in the City of Ottawa. If not, please explain why not.

b) Please provide details on how Hydro Ottawa coordinated with the City of Ottawa and related community stakeholders to include planning requirements and input into the Regional Planning process to enable Ottawa's net zero by 2050 plan.

2-CO-18

Please explain why the large investments over the most recent rate terms have not been sufficient to provide a suitable foundation to meet customer needs and energy transition changes. Stated another way, why is such a large pivot in planning and investment required starting in 2026?

2-CO-19

Reference: Utility-Owned Battery Energy Storage Solutions (BESS) [2/5/8, page 8] and Table 4 [2/5/8, page 61]

a) Please explain how the BESS solutions have reduced peak demand and need for incremental tradition Capital solutions.

b) BESS solutions appear to be one of the lowest DER opportunities being leveraged (historically and forecasted over the plan) in Hydro Ottawa's service territory. Given the benefits of BESS, please explain how Hydro Ottawa can significantly increase their adoption over the plan.

c) Having the utility own DERs rather than incenting/enabling non-utility investment has been seen as a potential conflict of interest and barrier to broader DER implementation. This is one of the reasons why the OEB restricted focus for the Future of Energy Innovation on non-utility investments. Please explain Hydro Ottawa's approach to this and how it mitigates those (real or perceived) conflicts of interest to incent non-utility investment.

d) Please explain how Hydro Ottawa is going to ensure that the non-wires customer solutions in Table 4 move forward (i.e. what programs and efforts will make this a reality). Please also provide the estimated contribution (MW) by year from Table 4 that will come from 'utility owned battery storage' as compared to 'non-wires customer solutions'. Please also provide the estimated utility costs associated with the corresponding utility battery storage projects.

2-CO-20

Reference: This assessment does not take a position on behind-the-meter or utility scale assets. HOL can and should explore partnership opportunities with local organizations and solar, BESS, or RECIP owners to evaluate joint ownership models to reduce HOL total costs. While this assessment does contemplate the amount of NWS generation needed, deployment and alternative ownership strategies should be carefully considered and evaluated. [2/5/4, Attachment F, page 59]

a) Does the Capital plan envisage investment in gas or diesel RECIPs to address potential sub-station overloads? If yes, has Hydro Ottawa considered restricting RECIPs to renewable natural gas (RNG) and is there intent to restrict the use of carbon-intensive fuels such as natural gas?

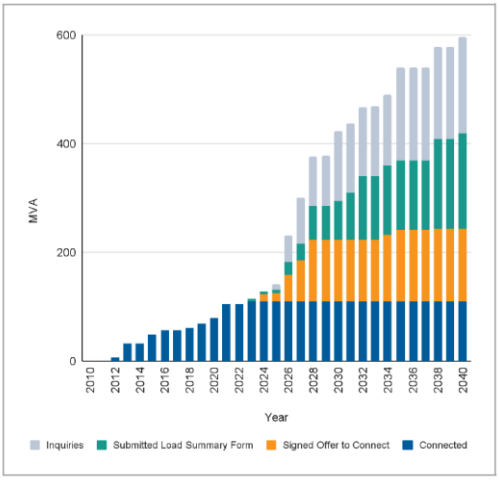
b) Has HOL done financial modelling around joint ownership models where third parties (including community investors) invest in NWSs? Given that the rate application

envisages significant cost on ratepayers this would seem to be an important step. Does Hydro Ottawa envisage opening private, community and/or municipal investment opportunities of this nature? If not, why not. If yes, please provide details.

2-CO-21

Reference: 2/5/1, page 58, Figure 4.

Figure 4 - Large Load Connections, Commitments, Requests & Inquiries




a) Please explain each category in the legend, including when a potential customer would need to make a binding commitment.

b) Please provide a summary by year of the types of customers represented in each of the four categories noted in the legend. Please also indicate what portion of the demand per year and by category relates to potential data center load.

c) Has Hydro Ottawa undertaken any probability analysis on the likelihood of each potential large load occurring as represented in the graph above? If not, why not. If yes, please provide a copy of those materials.

d) For proposed large load connections, please explain the process Hydro Ottawa used to determine the incremental cost due to the potential customer and how that cost is apportioned to the specific customer if they proceed.

e) Please confirm that the loads noted above were assumed to be concurrent peak loads. If that is not correct, please provide the analysis to decrease the potential peak loads, including the assumptions used.

2-CO-22

Reference: Hydro Ottawa's Distribution System Plan does not include the development of any specific renewable energy generation, in-front-of-meter, within its service area. Other than some battery storage, all Non Wire Solutions (NWS) are assumed to be on the customer side of the meter. The OEB has encouraged distribution solutions that reduce transmission bottle-necks and the IESO is developing a Local Generation Program and the OEB is proposing a program-based Distribution System Operator systems. These types of facilities could help to meet demand in constrained areas and lower capital requirements.

a) Has Hydro Ottawa assessed those opportunities? If not, why not. If yes, please provide a copy of the assessment.

b) Why has Hydro Ottawa not planned for the procurement of these types of front-of-the-meter facilities or at least included the implementation of pilot programs such as subscription based Community Solar?

2-CO-23

Reference: The new (January 1, 2024) Ultra Low Overnight Time-of-Use rates were designed to impact customer behaviour. Please provide the following information pertaining to Hydro Ottawa.

a) Number of customers using this billing arrangement,

b) Number and kWs of solar net metering systems with ULOTOU rate,

c) Impact on the local feeder lines,

d) Geographical concentration of the ULOTOU rate and solar net-metering,

e) How may ULOTOU customers also have:
   - Solar net-metering,
   - EV's,
   - Heat Pump's,
   - Home batteries

2-CO-24

a) Have any requests for DERs been declined by Hydro Ottawa over the current term (2021-2025). If yes, please provide details.

b) Please provide the maximum, minimum and average time for Hydro Ottawa to connect a DER once it has received the request. Information based on the current rate term (2021-2025) is preferred, but if Hydro Ottawa uses a different time period, please provide those details.

2-CO-25

a) Please provide the number of data centers and corresponding demand forecast included in the Hydro Ottawa forecast.

b) Have any eDSM or other demand management measures been applied to the data center demand profile. If not, why not. If yes, please provide details including the reductions being applied.