VIA RESS and EMAIL

July 22, 2025

Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario M4P 1E4

Dear Ritchie Murray:

Re: Hydro Ottawa Limited (Hydro Ottawa)
Custom Incentive Rate-Setting (Custom IR) Application for 2026-2030
Consumers Council of Canada (CCC) Interrogatories
OEB File No. EB-2024-0115

In accordance with Procedural Order No. 1, dated June 3, 2025, please find attached CCC's interrogatories with respect to Hydro Ottawa's 2026-2030 Custom IR application.

Yours truly,

Lawrie Gluck

Lawrie Gluck
Consultant for the Consumers Council of Canada

cc: All parties in EB-2024-0115

Hydro Ottawa Limited

2026-2030 Custom IR

Consumers Council of Canada

Interrogatories

July 22, 2025

Exhibit 1 – Overview and Administration

1-CCC-1
Ref: Exhibit 1, Tab 2, Schedule 5, pp. 16, 31-37, 39, 43

Question(s):

a) (P. 16) With respect to the wood pole price trend, please provide the equivalent analysis based on Canadian data.

b) (P. 31) Please confirm that the OEB's labour escalation rate over-compensated Hydro Ottawa during the period 2021-2025 relative to the actual labour costs incurred.

c) (P. 32-34) Please provide the detailed spreadsheets that support the price analysis shown in Tables 25-30.

d) (P. 35) Please provide the detailed spreadsheets that support the price analysis shown in Table 31. As part of the response, please also provide detailed summaries of the outside services contracts reflected in the analysis.

e) (P. 36) Please provide the specific annual labour increases applied to the OM&A and capital program budget. As part of the response, please provide a detailed calculation that shows how the currently negotiated collective agreement, and bank/government forecasts were incorporated.

f) (P. 36) Please provide the specific inflation adjustments (within the range of 2.1% and 5.0%) that were applied to the various categories of equipment and materials. As part of the response, please provide the detailed spreadsheets and input assumptions applied to derive the inflationary adjustments. Please also highlight which capital programs these inflation adjustments are relevant to.

g) (P. 36) For ratemaking purposes, please provide the weighted-average inflation rate applied to each of the proposed OM&A budget (2026) and the proposed capital budget (2026-2030) as reflected in the various program budgets.

h) (P. 36) Please explain the basis for the assumption that "some of the inflationary trends noted in the previous Sections are expected to continue for the 2026-2030 period…"

i) (P. 39) Please confirm that the 6.851% utilities machinery and equipment inflation is approximately 66% higher than the overall machinery and equipment inflation of 4.125%. Assuming an overall inflation rate of 2.0%, please confirm that the resulting utility inflation would be 3.32% not 4.7% as calculated by Hydro Ottawa (when holding the incremental inflation applicable to utilities machinery and equipment on a percentage basis constant).

j) (P. 43) Please provide an update to the foreign exchange analysis using the best available information.

1-CCC-2
Ref: Exhibit 1, Tab 3, Schedule 1, pp. 13, 15, 16, 23, 29, 32, 34

Question(s):

a) (P. 13) Please advise whether the capital-related revenue requirement shown in Table 2 reflects Hydro Ottawa's proposal with respect to the treatment of the CCA benefit as a capital contribution.

b) (P. 13) Please confirm that the statement that property taxes were included in the capital-related spending as part of Hydro Ottawa's capital-related stretch factor refers to the approved 2021-2025 Custom IR framework methodology.

c) (P. 13) Please confirm, or revise as necessary, the following table which reflects Hydro Ottawa's proposed 2026-2030 revenue requirement (broken out between capital-related revenue requirement and OM&A).

	2026	2027	2028	2029	2030	Total
CRRR	**$ 169.99**	**$ 188.20**	**$ 208.50**	**$ 224.50**	**$ 240.00**	**$ 1,031.19**
Amortization	$67.20	$75.40	$82.30	$88.40	$94.40	$407.70
Income Taxes	$6.60	$6.50	$12.20	$12.70	$15.40	$53.40
Deemed Interest Expense	$36.40	$40.40	$45.30	$49.00	$51.70	$222.80
ROE	$55.20	$61.30	$68.70	$74.40	$78.50	$338.10
PIL Cont.	$ 4.59	$ 4.60				$9.19
Property Taxes						
OM&A	**$ 140.01**	**$ 147.26**	**$ 154.89**	**$ 162.91**	**$ 171.35**	**$776.43**
Service RR	**$ 310.00**	**$ 335.46**	**$ 363.39**	**$ 387.41**	**$ 411.35**	**$ 1,807.62**
Rev. Offset	$ 11.02	$ 10.70	$ 10.86	$ 11.12	$ 11.46	$ 55.16
Base RR	**$ 298.98**	**$ 324.76**	**$ 352.53**	**$ 376.29**	**$ 399.89**	**$ 1,752.46**
CROF	1.0518					

d) Please revise the above table for each of the scenarios discussed below.

i) Treating the SR&ED tax credits as an offset to PILs (instead of reductions to OM&A and rate base).

ii) Treating the CCA benefit as it was treated historically (i.e., not as a capital contribution).

iii) Treating both the SR&ED tax credits and the CCA benefit (i.e., both (i) and (ii) above) as an offset to PILs.

iv) Including property taxes as a separate line item that forms part of the capital-related revenue requirement.

e) (P. 17) Please provide a specific reference to the 2021-2025 CIR evidence and decision that sets out the previously approved treatment of SR&ED tax credits. Please confirm that Hydro Ottawa's proposed treatment is the same as the previously approved approach. If not, please explain the differences.

f) (P. 17) Please provide reference(s) to the current evidence where the SR&ED credits operate to offset capital and OM&A costs.

g) (P. 23) Please provide the calculation supporting the statement that using quantifiable productivity savings estimated for 2025, the base year OM&A has been reduced by 2.3% which results in a 2027-2030 additional stretch factor embedded in OM&A of 0.61%.

h) (P. 25) Please provide a specific reference within the cost allocation model showing the 54.8% / 45.2% weighting between capacity and customers.

i) (P. 25) Please provide Hydro Ottawa's views on the relationship between capacity/customer growth and OM&A costs.

j) (P. 29) Please confirm that in the 2021-2025 IR term, the costs associated with commercial expansions and capacity upgrades for housing developments were included as part of the scope of the asymmetrical sub-accounts.

k) (P. 32) Please explain how the avoided capital investments resulting from the NWS solutions will be reflected in the NWS Variance Account. As part of the response, please provide an illustrative calculation that shows how the balance in the account will be calculated.

l) (P. 34) With respect the large load requests as reflected in Table 8 of Schedule 3-1-1, please advise whether the Large Load Revenue Variance Account is applicable to all of the demand reflected in the table (given that part of the demand appears to be related to electrification generally instead of large load requests).

m) (P. 34) Please confirm that the Large Load Revenue Variance Account is intended to true-up only the distribution revenue variances resulting from changes in the timing of Large Load connections.

n) (P. 34) With respect to new (or incremental) large load requests beyond those reflected in Table 8 of Schedule 3-1-1, please advise how those will be treated (and whether the associated revenue variance will be included in the Large Load Revenue Variance Account).

o) (P. 34) With respect to revenue requirement changes (between the amount recovered in rates and actual) resulting from variances in the timing of Large Load connections, please advise whether those variances will also be recorded in the Large Load Revenue Variance Account (or any other account).

p) (P. 34) Please provide an illustrative calculation that shows how the balance in the Large Load Revenue Variance Account will be calculated. As part of the response, please provide the proposed baseline to which variances will be measured.

1-CCC-3
Ref: Exhibit 1, Tab 3, Schedule 3, pp. 6-7

Question(s):

a) (PP. 6-7) Please provide rationale for the peer groups used for the various benchmarking metrics as shown in Table 2.

b) Please confirm that the results in Figures 1 & 2 in Exhibit 1, Tab 3, Schedule 3 are not based on the peer groups discussed in Table 2 (and instead are relative to all distributors in Ontario).

1-CCC-4
Ref: Exhibit 1, Tab 3, Schedule 3, Attachment A, pp. 7-9, 11-13

Question(s):

a) (PP. 7-9) In the context of the very low kilometres of OH secondary lines shown in the early years of the 2008-2023 period, please explain why Hydro Ottawa does not believe that there was missing data in those years. As part of the response, please

explain the significant increase in OH secondary lines 63km to 894km between 2008 and 2015.

b) (P. 9) Please confirm that the CAGR used in the extrapolation exercise (Step 4) utilizes the total circuit km (combined primary and secondary cable) in Table 4.

c) (PP. 11-13) Please advise whether the costs of CDM are included in PEG's model (in the absence of Hydro Ottawa's adjustments). Please also advise whether Hydro Ottawa included CDM costs in its adjustments to the PEG model.

1-CCC-5
Ref: Exhibit 1, Tab 3, Schedule 3, Attachment B, pp. 1, 8

Question(s):

a) (P. 1) Please further explain the statement that Hydro Ottawa "does not base its financial forecasts on operation inputs, leaving the denominators unknown." As part of the response, please explain how historical unit costs are reflected in the capital and OM&A forecasts.

b) (P. 8) Please discuss Hydro Ottawa's tree coverage relative to the peer group (which is based on urban/rural split) for vegetation management.

1-CCC-6
Ref: Exhibit 1, Tab 3, Schedule 3, Attachment E, pp. 12-13, 16-18, 20, 23, 25, 27, 32, 39

Question(s):

a) (P. 12) Please explain what Gartner means by "power recovery" costs.

b) (P. 12) Please confirm that "power recovery" and cost of power are reflected in both Hydro Ottawa's revenues and costs.

c) (P. 12) Please confirm that power recovery and cost of power are pass-through costs. Please explain why those costs were included in the benchmarking analysis.

d) (P. 12, 32) Please explain what Gartner considers to be operational technology and why that was excluded from the analysis.

e) (PP. 12-13) Please provide the list of 9 companies included in the custom peer group. As part of the response, please provide the information for each company as shown in the "Custom Peer Group Profile." Please also advise whether power recovery / cost of power and operational technology forms part of the custom peer companies' revenues and costs in the analysis.

f) (P. 13) Please provide the average USD to CAD exchange rate for the 2022 to 2023 period, which aligns with the data vintage used in the study.

g) (PP. 16-18) As applicable, please provide slides 16-18 showing the same metrics (i.e., IT spend as a % of revenues and operating expenses) with all pass-through costs removed from both Hydro Ottawa and the peers. Please also show the revised "calculation" dollar values (i.e., IT spend $ / revenues or operational expenses excluding pass-through costs).

h) (P. 20, 39) Please explain how Gartner determines whether a type of spending is transform, grow or run. More specifically, what type of information does Gartner receive from Hydro Ottawa and the peers that allows this type of classification to be completed.

i) (P. 23) Please advise whether the data underpinning the analysis of personnel spending on page 23 reflects the 2023 labour disruption.

j) (P. 25) Please provide the supporting documentation (spreadsheets with assumption shown) that supports the real dollar analysis on Slide 25.

k) (P. 27) Please advise whether the data underpinning the analysis of personnel spending on page 27 reflects the 2023 labour disruption. To the extent possible, please provide a revised version that assumes the labour disruption did not occur (i.e., grosses up FTEs to the full-year).

l) (P. 32) Please confirm that the "cash out" basis means that the capital costs reflected in the analysis are expenditures as opposed to in-service additions.

m) (P. 32) Please explain how the costs of facilities related to the IT function were calculated for Hydro Ottawa specifically. Please also explain the implications on total IT budget costs, based on Gartner's methodology, of leased versus owned facilities.

1-CCC-7
Ref: Exhibit 1, Tab 3, Schedule 3, Attachment F, pp. 6, 8-11

Question(s):

a) (P. 6) Please further explain how Hydro Ottawa/Mercer determined which roles to review in the study. Please provide the overall percentage of Hydro Ottawa's roles that were reviewed as part of the study (i.e., roles in study / total Hydro Ottawa roles). Please also provide the overall percentage of Hydro Ottawa's 2024 FTEs that were reviewed as part of the study (i.e., FTEs in the roles in the study / total FTEs).

b) (P. 8) Please explain why long-term incentives were not included in the study.

c) (PP. 8-11) For each role reviewed in the study, please provide the forecast 2026 base salary and target total cash compensation and the 2026 number of FTEs that are forecast to be in those roles as reflected in Hydro Ottawa's application.

1-CCC-8
Ref: Exhibit 1, Tab 3, Schedule 4, pp. 1, 3, 11, 16, 22-24

Preamble:

(PP. 1, 3) Hydro Ottawa states that the productivity initiatives have been incorporated into Hydro Ottawa's capital expenditure forecast and productivity factor applied to OM&A costs.

Question(s):

a) Please provide specific references to the evidence that show where the forecast (2026-2030) productivity savings (Table 1) are directly reflected as offsets to the

2026-2030 capital expenditure budgets, capital in-service additions, and OM&A budgets.

b) Please provide specific references to the evidence that show where the historical (2021-2025) capital-related productivity savings directly offset opening 2026 rate base and the OM&A-related productivity savings reduce the test year OM&A budgets.

c) (P. 1) Please provide the annual revenue requirement reduction reflected in the application resulting from the productivity initiatives for each year 2026 to 2030. Please separate these revenue requirement reduction as between capital-related revenue requirement (and further breakout between depreciation, interest, ROE and taxes) and OM&A.

d) (P. 11) Please explain how capital depreciation was calculated for each sub-category of the labour and supply chain initiatives. As part of the response, please advise whether these are annual depreciation savings.

e) (P. 16) Hydro Ottawa states that improvements realized in the pole renewal program (23.6% decrease in labour hours per pole) serves as a representative model, reflecting the utility's commitment to enhancing efficiency and optimizing resource allocation across all capital programs (with the exception of station-related programs). Please advise whether the labour savings of 23.6% were reflected in the forecast capital program costs for all capital program (excluding station programs). If not, please explain what Hydro Ottawa means by the pole renewal program-related efficiencies being a "representative model." If yes, please show, with specific reference to the evidence, where these savings are shown in the capital programs.

f) (P. 16) Please advise whether Hydro Ottawa has performed similar impact analysis with respect to its strategic operational and project management enhancements on capital programs other than the planned pole renewal program. If yes, please provide that analysis.

g) (P. 22) Please further explain why Hydro Ottawa could not estimate the 2026-2030 savings resulting from its vendor and supplier engagement practices using historical savings as a proxy.

h) (P. 23) Please explain how capital depreciation was calculated for each sub-category of the innovation and digital transformation initiatives. As part of the response, please advise whether these are annual depreciation savings.

i) (P. 23) Using net metering automation as an example of a productivity improvement that starts accruing savings in the forecast period and impacts only OM&A costs, please explain how the savings of $6.7M are reflected in 2026-2030 rates in the context of Hydro Ottawa's proposed rate framework (and specifically, the CROF).

j) (PP. 24, 32) With respect to the CIS-related reduced managed service costs, please advise whether those cost savings from the 2021-2025 period flow into 2026. If not, please explain what Hydro Ottawa has done to control these costs in the forecast period.

k) (P. 33) Please explain how capital depreciation was calculated for each sub-category of the infrastructure and equipment efficiencies initiatives. As part of the response, please advise whether these are annual depreciation savings.

l) (P. 34) Please confirm that none of "other innovation, productivity, and continuous improvement initiatives" are reflected as offsets to revenue requirement for ratemaking purposes.

m) (P. 36) Please provide the number of outage calls in 2024 handled by agents and the number of outage reports managed through self-service.

1-CCC-9
Ref: Exhibit 1, Tab 4, Schedule 1

Question(s):

Please provide a table setting out for each year, 2021-2026, the cost of Hydro Ottawa's customer engagement activities as described in Schedule 1.

1-CCC-10
Ref: Exhibit 1, Tab 4, Schedule 2, p. 10

Question(s):

a) A large number of letters of comment opposing Hydro Ottawa's proposed rate increase were filed on the record. Please explain how these letters from Hydro Ottawa's customers reconcile with Hydro Ottawa's customer engagement results in Table 2 at page 10.

b) Please confirm that approximately 50% of the responses across all rate classes opposed (or "do not like") the proposed bill increases.

1-CCC-11
Ref: Exhibit 1, Tab 4, Schedule 2, Attachment A, pp. 87-88, 249

Question(s):

a) (PP. 87-88) Please provide a comparison of the demographic information of the residential participants for the Phase 1 online survey relative to Hydro Ottawa's service territory overall.

b) (P. 249) Please provide a comparison of the demographic information of the residential participants for the Phase 2 workbook relative to Hydro Ottawa's service territory overall.

c) Please discuss why different demographic information was collected between the Phase 1 and Phase 2 customer engagement activities.

1-CCC-12
Ref: Exhibit 1, Tab 6, Schedule 1, pp. 2-3

Preamble:

Hydro Ottawa Holding Inc. has a Board of Directors. A separate subsidiary Board of Directors was established to oversee the operations of the utility in accordance with the OEB's *Affiliate Relationships Code for Electricity Distributors and Transmitters* in 2006. The powers and functions of the utility Board are set out in a Shareholder Declaration by its

Shareholder, Hydro Ottawa Capital Corporation. On a day-to-day basis Hydro Ottawa Holding Inc. is led by an Executive Management Team comprised of the President and CEO, the CFO and the senior executives of the subsidiaries and critical functional areas.

Question(s):

a) Please file the Shareholder Declaration.

b) Please describe the relationship between Hydro Ottawa Holding Inc.'s Board of Directors and Hydro Ottawa Inc.

c) Please describe what activities are undertaken by Hydro Ottawa Capital Corporation.

d) Please list all "other non-regulated entities" within Hydro Ottawa Capital Corporation.

e) Please indicate whether the Hydro Ottawa Limited's Board of Directors including the CEO and VP Distribution Planning and Asset Management have any responsibilities for Hydro Ottawa Energy Services Inc. and/or the other non-regulated entities.

f) Please describe the responsibilities of the Hydro Ottawa Holding Inc.'s Executive Management Team regarding the unregulated entities under Hydro Ottawa Capital Corporation and Hydro Ottawa Energy Services Inc.

g) Please describe the responsibilities of the Hydro Ottawa Holding Inc.'s Executive Management Team regarding Hydro Ottawa Limited.

1-CCC-13
Ref: Exhibit 1, Tab 6, Schedule 1

Question(s):

Please provide all materials provided to Hydro Ottawa Holding Inc.'s and Hydro Ottawa Limited's Board of Directors regarding this Application. Were the Application and related

Business Plans approved by both Board of Directors? If not, which Board granted approvals?

Exhibit 2 – Rate Base and Distribution System Plan (DSP)

2-CCC-14

Ref: Exhibit 2, Tab 1, Schedule 1, pp. 1, 23, 29
Exhibit 2, Tab 7, Schedule 1, p. 6
Appendix 2-AA
Appendix 2-D

Question(s):

a) Please provide a revised version of Appendix 2-AA that includes an update to the forecast 2024 and 2025 capital expenditures (and 2026-2030 as necessary) using the current best available information. In addition, instead of including the capital contributions only at the major category level (e.g., system access, system renewal, etc.), please also provide the capital contributions at the program level (e.g., Plant Relocation, System Expansion, etc.).

b) Please provide a revised version of Appendix 2-AA on an in-service addition basis (as opposed to capital expenditures). As part of this revised version, please update the forecast 2024 and 2025 in-service additions (and 2026-2030 as necessary) using the current best available information. In addition, instead of including the capital contributions only at the major category level (e.g., system access, system renewal, etc.), please also provide the capital contributions at the program level (e.g., Plant Relocation, System Expansion, etc.).

c) Please advise whether Hydro Ottawa uses the half-year rule for determining rate base with respect to all assets (including both pooled assets and the significant discrete in-service additions shown in Table 19 of Exhibit 2, Tab 1, Schedule 1, p. 29).

d) Please confirm that Hydro Ottawa uses the half-year rule for determining depreciation for pooled assets. However, for discrete material projects, it uses the actual or forecasted in-service month.

e) (Exhibit 2, Tab 7, Schedule 1, p. 6) With respect to "discrete material assets" forecast to be placed in-service during the forecast period (2026-2030) and are applied the monthly approach for the determination of depreciation expense, are these the same assets as shown in Table 19 of Exhibit 2, Tab 1, Schedule 1, p. 29?

f) Please explain Hydro Ottawa's methodology for forecasting the timing of in-service additions. As part of the response, please discuss whether Hydro Ottawa applies a different approach to ongoing capital programs relative to discrete significant capital expenditures. As an example related to an ongoing capital program, how does Hydro Ottawa determine whether an expenditure related to its OH distribution renewal program should be considered in-service in the year that the investment is made or in the following year(s)?

g) Please discuss whether, historically, Hydro Ottawa's pooled assets were typically placed in-service towards the beginning of the year or towards the end of the year. As part of the response, please advise whether Hydro Ottawa is able to track the month in which a pooled asset is placed in service.

h) (Exhibit 2, Tab 1, Schedule 1, p. 23) With respect to the significant in-service additions shown in Table 16, please revise the planned in-service date column to include the in-service month along with the year that the asset was placed in service.

i) (Exhibit 2, Tab 1, Schedule 1, p. 29) With respect to the significant in-service additions shown in Table 19, please revise the planned in-service date column to include the in-service month along with the year that the asset is forecast to be placed in service.

j) Please provide an illustrative calculation showing Hydro Ottawa's conversion of capital expenditures to in-service additions to rate base to revenue requirement. As part of the calculation, please use Hydro Ottawa's proposed cost of capital and a weighted-average depreciation rate (reflecting all of Hydro Ottawa's assets).

k) (Appendix 2-D) Please explain the decrease (on a percentage basis) of capitalized OM&A between 2021 and 2026.

2-CCC-15

Ref: Exhibit 2, Tab 1, Schedule 1, pp. 14-15
Hydro Ottawa, July 4, 2025 Letter re: Grid Technology Program
Exhibit 2, Tab 5, Schedule 5, p. 102

Question(s):

a) (Exhibit 2, Tab 1, Schedule 1, p. 14) Please provide the in-service additions associated with the "Self-Contained Meter Phone Line Elimination project" during the 2021-2025 period (broken out by year).

b) (Exhibit 2, Tab 1, Schedule 1, p. 14) Please further explain the "Gatekeeper solution" for the "Self-Contained Meter Phone Line Elimination project."

c) (Exhibit 2, Tab 1, Schedule 1, p. 14) With respect to the Gatekeeper meters that were installed (assuming there were some installed), please advise whether these will be replaced as part of the AMI 2.0 initiative planned for 2026-2030. If yes, please explain why.

d) (Exhibit 2, Tab 1, Schedule 1, p. 15) With respect to the grid technologies system service capital program, please provide:

   i) The original planning/scoping documents for the ADMS project.

   ii) Any change requests / scope change documents related to the ADMS project that were completed at the time of "detailed implementation planning"

   iii) Specifics regarding the significant gaps in the original requirements.

   iv) A summary of the key decisions made and the timing of those decisions when significant gaps in the original requirements were recognized.

e) (Hydro Ottawa July 4 Letter) Please confirm that the timing changes for the SCADA/ADMS program result in an approximate $14.5M reduction to opening rate base.

f) (Hydro Ottawa July 4 Letter) Please provide any internal documentation produced related to the comprehensive review of the ADMS program.

g) (Exhibit 2, Tab 5, Schedule 5, p. 102) With respect to the customer engagement platform project, please provide:

   i) The original planning/scoping documents from when Hydro Ottawa determined that it was necessary to redesign its customer portal.

   ii) Any change requests / scope change documents from when Hydro Ottawa determined that additional functionality related to customer self-service options were necessary.

   iii) A summary of the key decisions made and the timing of those decisions when Hydro Ottawa decided to re-design its customer portal.

2-CCC-16
Ref: Exhibit 2, Tab 5, Schedule 1, p. 69

Question(s):

Please explain how corrective capital (i.e., reactive replacements) is reflected in Hydro Ottawa's estimate of percentage of assets in degraded condition after investment.

2-CCC-17
Ref: Exhibit 2, Tab 5, Schedule 4, pp. 213, 215, 218, 221, 301-302

Question(s):

a) (P. 213) Please provide the expected timing of the issuance of the final IRRP report. As part of the response, please discuss what actions Hydro Ottawa would take with respect to its system capacity-related investments if there is a material change to forecast capacity requirements resulting from the updated report.

b) (P. 215, 218, 221) With respect to Tables 33, 34 and 35, please advise which tables are showing projects with capital expenditures during the 2026-2030 period.

c) (P. 215) Please provide an expanded Table 33 that includes columns showing:

   i) The in-service date for the solution

   ii) The cost of the solution

   iii) A listing of the specific capital program budget (and evidentiary reference) where the costs are reflected (assuming the work is planned to be completed during the current CIR term).

d) (P. 218) Please provide an expanded Table 34 that includes columns showing:

   i) The in-service date for the solution

   ii) The cost of the solution

   iii) A listing of the specific capital program budget (and evidentiary reference) where the costs are reflected (assuming the work is planned to be completed during the current CIR term).

e) (P. 221) Please provide an expanded Table 35 that includes columns showing:

   i) The in-service date for the solution

   ii) The cost of the solution

   iii) A listing of the specific capital program budget (and evidentiary reference) where the costs are reflected (assuming the work is planned to be completed during the current CIR term).

f) (P. 229) Please explain why the planning forecast is higher than the IRRP forecast up to 2029.

g) (P. 232) Please explain why the planning forecast is higher than the IRRP forecast for part of the 2026-2030 period.

h) (P. 301) Please provide an update with respect to the preliminary inquiries and formal load summary submissions. As part of the response, please advise how much of this capacity (199 MVA) has moved to the offers to connect stage.

i) (P. 302) Please provide Figure 113 in tabular format.

j) (PP. 301-305) Please provide a summary regarding how the IRRP forecast and the decarbonization study are incorporated as part of Hydro Ottawa's planning forecast.

k) (P. 301-305) Please discuss the implications on Hydro Ottawa's forecast capacity requirements and related capacity expansion-related investments based on the following changes to the underlying assumptions. As part of the response, please provide estimates of the changes to the cost of planned system capacity-related investments.

   i) Removal of all the large load requests in the preliminary inquiry stage.

   ii) Removal of all the large load requests in the preliminary inquiry and formal load summary stages

   iii) Use of the dual-fuel decarbonization scenario.

   iv) Use of the low decarbonization scenario.

   v) Use of the revenue load forecast (instead of the planning forecast).

l) (P. 305) Based on each of Hydro Ottawa's planning load forecast and revenue load forecast, when does Hydro Ottawa estimate that its system will become winter peaking.

2-CCC-18
Ref: Exhibit 2, Tab 5, Schedule 5, pp. 8, 20, 23, 26

Question(s):

a) (P. 8) Please confirm that when a program has changed between the 2021-2025 DSP and the 2026-2030 DSP (e.g., Customer Connections Program was previously three separate programs), the relevant program(s) in the historical period and the forecast period have been presented on the same basis for ease of comparison. As part of the response, please identify any programs that have not been presented in this manner.

b) (P. 20) With respect to the Mer-Bleue MTS, please reconcile the statement that this project resulted in $13.8M of unbudgeted expenditures with the $6.6M shown in Table 16 (Exhibit 2, Tab 1, Schedule 1, p. 25).

c) (P. 20) With respect to the Piperville MTS, please reconcile the statement that this project experienced cost overruns with the information provided for this project in Table 16 (i.e., $14.7M actual cost relative to $24.6M planned cost) (Exhibit 2, Tab 1, Schedule 1, p. 24).

d) (P. 23) Please explain the reason for the difference between the $102M CAPEX variance (between $498M approved and $600M actual) and the $45M ISA variance (between $555M approved and $600M actual). As part of the response, please provide a reference to the 2021-2025 CIR application/settlement/decision where the $555M of approved ISAs can be found.

e) (P. 26) Please reconcile the Fisher AK station and Dagmar station deferred budget amounts discussed at p. 26 to the amounts shown in Table 16 (Exhibit 2, Tab 2, Schedule 1, pp. 23-25).

2-CCC-19
Ref: Exhibit 2, Tab 5, Schedule 6, pp. 9-10

Question(s):

a) (P. 9) Please explain what “contributed plant” refers to in Table 2. As part of the response, please advise whether contributed plant is considered gross capital (as provided by a third-party) but is also offset in the contributed capital line (i.e., it has

a net impact of zero). Please confirm whether this is true for all capital programs (where there are both contributed capital and contributed plant).

b) (P. 9) Please explain why the 2021-2023 period was selected as the relevant basis for the forecast capital contributions during the 2026-2030 period.

c) (P. 9) Please provide the annual gross plant additions and contributed capital for the 2018-2020 period for the plant relocation and upgrades program.

d) (P. 9) Please provide the annual 2021-2025 gross expenditure cost resulting from the average project volumes (excluding discrete projects).

e) (P. 9) Please provide the forecast costs for each of the three planned projects (2026-2030) listed on page 9 and the year that the expenditure is expected to be incurred.

f) (P. 10) Please advise whether any costs associated with upgrades for system improvement are incorporated in the proposed 2026-2030 budget for the plant relocation and upgrade program. As part of the response, please provide the annual cost related to system improvements in the plant relocation and upgrade program for the forecast period (2026-2030) and the historical period (2021-2025).

2-CCC-20
Ref: Exhibit 2, Tab 5, Schedule 6, p. 27

Question(s):

a) (P. 27) Please explain why the 2021-2025 period was selected as the relevant basis for the forecast capital contributions during the 2026-2030 period.

b) (P. 27) Please provide the gross plant additions and contributed capital for the 2018-2020 period for the residential subdivision program.

c) (P. 27) Please explain why the 2021-2023 period was selected to determine the average connection volume underpinning the 2026-2030 forecast.

d) (P. 27) Please provide the 2021-2025 average connection volume for the residential subdivisions program.

e) (P. 27) Please provide details, including the relevant calculations, that show the 2021-2023 average connection volume being escalated by the City of Ottawa's residential development growth for the 2026-2030 period that results in the forecast costs for the residential subdivision program for the forecast period.

f) (P. 27) Please advise whether costs per connection are used as part of the forecasting methodology for the 2026-2030 period in the residential subdivision program. As part of the response, please provide historical (2021-2025) cost per connection and forecast (2026-2030) cost per connection data in tabular format.

2-CCC-21
Ref: Exhibit 2, Tab 5, Schedule 6, pp. 28-29

Question(s):

a) (P. 29) Please explain why the 2021-2025 period was selected as the relevant basis for the forecast capital contributions during the 2026-2030 period.

b) (P. 29) Please provide the gross plant additions and contributed capital for the 2018-2020 period for the commercial developments program.

c) (P. 29) Please explain why the 2021-2023 period was selected to determine the average connection volume (excluding discrete projects) underpinning the 2026-2030 forecast.

d) (P. 29) Please provide the 2021-2025 average connection volume (excluding discrete projects) for the commercial development program.

e) (P. 29) Please provide details, including the relevant calculations, that show the 2021-2023 average connection volume (with discrete projects removed) being escalated by the City of Ottawa's employment growth projection for the 2026-2030 period that results in the forecast costs for the commercial development program for the forecast period.

f) (P. 29) Please advise whether costs per connection are used as part of the forecasting methodology for the 2026-2030 period in the commercial development program. As part of the response, please provide historical (2021-2025) cost per connection and forecast (2026-2030) cost per connection data in tabular format.

2-CCC-22
Ref: Exhibit 2, Tab 5, Schedule 6, pp. 30-31

Question(s):

a) (P. 31) Please provide the gross plant additions and contributed capital for the 2018-2020 period for the infill services program.

b) (P. 31) Please explain why the 2021-2023 period was selected as the relevant basis for the forecast capital contributions during the 2026-2030 period.

c) (P. 31) Please explain why the 2021-2023 period was selected to determine the average connection volume underpinning the 2026-2030 forecast.

d) (P. 31) Please provide the 2021-2025 average connection volume for the infill services program.

e) (P. 31) Please provide details, including the relevant calculations, that show the 2021-2023 average connection volume being escalated by the City of Ottawa's residential development growth forecast for the 2026-2030 period that results in the forecast costs for the infill services program for the forecast period.

f) (P. 31) Please advise whether costs per connection are used as part of the forecasting methodology for the 2026-2030 period in the residential infill program. As part of the response, please provide historical (2021-2025) cost per connection and forecast (2026-2030) cost per connection data in tabular format.

2-CCC-23
Ref: Exhibit 2, Tab 5, Schedule 6, pp. 52-53

Question(s):

a) (P. 53) Please provide a table showing the 2018-2022 gross and contributed capital for the system expansion program that reconciles to the 64% of gross cost capital contribution proportion discussed on page 53. As part of the response, please also explain why the 2018-2022 period was selected as the relevant basis for the forecast capital contributions during the 2026-2030 period.

b) (P. 53) Please explain why the 2021-2023 period was selected to determine the average volume (excluding discrete large load requests) underpinning the 2026-2030 forecast.

c) (P. 53) Please provide the 2021-2025 average volume (excluding discrete large load requests) for the system expansion program.

d) (P. 53) Please provide details, including the relevant calculations, that show the 2021-2023 average volume (excluding discrete large load requests) escalated by the observed increase in complexity/scale and the addition of the discrete large load requests that results in the forecast costs for the system expansion program for the forecast period.

e) (P. 53) Please provide the forecast costs for each of the three discrete projects listed on page 53 and the year that the expenditure is expected to be incurred.

2-CCC-24
Ref: Exhibit 2, Tab 5, Schedule 7, pp. 28-29, 34, 37

Question(s):

a) (PP. 28-29) Please provide a single table that shows the 2021-2030 costs shown in Table 3 and the number of assets replaced as shown in Table 4. Please also provide a row showing the related unit costs per asset replacement.

b) (PP. 28-29) Please advise whether any of the replacements shown in Table 4 are covered by the budget for the EOL Voltage Conversion program (or is it only the removals that are covered).

c) (P. 34) Please provide a table that further disaggregates the EOL Voltage Conversion program by project (i.e., Fisher, Dagmar, etc.) for both the historical and forecast period. As part of the table, please provide as much detail as possible with respect to the components of each project.

2-CCC-25
Ref: Exhibit 2, Tab 5, Schedule 7, pp. 67, 70-73

Question(s):

a) (P. 67) Please provide a single table that shows the 2021-2030 costs shown in Table 9 and the number of assets replaced as shown in Table 10. Please also provide a row showing the related unit costs per asset replacement.

b) (P. 70) Please provide the cost associated with the system observability investments in each of the three alternatives.

c) (P. 71) Please explain whether pole refurbishment (e.g., pole reinforcement) was considered as part of Hydro Ottawa's overhead renewal program. If yes, please provide details of that analysis. If no, please explain why not.

d) (PP. 70, 72) Please advise whether the entire $1.6M incremental resilience investment is related to the undergrounding of 30 poles.

2-CCC-26
Ref: Exhibit 2, Tab 5, Schedule 7, pp. 104-106

Question(s):

a) (P. 104) Please provide a single table that shows the 2021-2030 costs shown in Table 15 and the number of assets replaced as shown in Table 16. Please also provide a row showing the related unit costs per asset replacement. If Hydro Ottawa is unable to breakout the cable and transformer replacements (as the UG transformers do not have a distinct budget), please further explain why no budget can be estimated.

b) (P. 105) Please provide a detailed calculation (including all assumptions) that shows how Hydro Ottawa estimated the $1.4M/km cost for the 2026-2030 budget.

c) (P. 105) Please explain whether cable refurbishment (e.g., cable injection) was considered as part of Hydro Ottawa's underground renewal program. If yes, please provide details of that analysis. If not, please explain why not.

d) (P. 106) Please advise whether the forecast 2026-2030 vault renewal budget includes any customer-owned vaults. If so, please provide the number of customer-owned vaults where renewal work will be completed and provide an update on the discussions with those customers.

e) (P. 108) Please provide the cost associated with the system observability investments in each of the three alternatives.

2-CCC-27
Ref: Exhibit 2, Tab 5, Schedule 7, pp. 138-140, 145

Question(s):

a) (P. 138) Please provide a single table that shows the 2021-2030 capital costs shown in Table 21 and the number of meters replaced as shown in Table 22. Please also provide a row showing the related unit costs per asset replacement. As part of the response, please discuss what appears to be very significant unit cost variances year-over-year.

b) (P. 138) Please explain how the derecognition costs in Table 21 were calculated.

c) (P. 140) Please discuss the implications phasing the meter replacement program over a longer period of time. For example, instead of phasing the replacements over 10 years, the meters would be replaced over 15 years. As part of the response, please provide the costs for the 2026-2030 period of a 15-year replacement cycle.

d) (P. 145) With respect to the meter seal expiry dates, please discuss whether Hydro Ottawa's proposed pacing of meter replacement will result in meter replacements in advance of the seal expiry date.

e) (P. 145) Please discuss whether Hydro Ottawa considered meter re-verification/re-sealing as an alternative to replacement. If so, please explain why this approach is not being pursued. As part of the response, please discuss the cost differential between replacement and re-verification/re-sealing.

2-CCC-28
Ref: Exhibit 2, Tab 5, Schedule 7, pp. 149, 160-163

Question(s):

a) (P. 149) With respect to the various asset types that are covered by Hydro Ottawa's proactive renewal programs and are also replaced reactively, please provide a table, using historical actuals (2021-2023 or 2021-2024 if available), that compares the average unit costs of reactive vs. proactive replacement.

b) (P. 160, 163) Please provide more specific details regarding the methodology applied to forecast the 2026-2030 corrective renewal program. As part of the response, please provide the calculation showing the use of historical actuals (including the years used) and the normalization of the impact of the 2022 Derecho storm. Please also discuss how reactive pole and UG transformer costs were forecast (as it appears that historical actuals were not the basis for forecasting costs for the reactive replacement of these assets).

2-CCC-29
Ref: Exhibit 2, Tab 5, Schedule 8, pp. 16, 49-52

Question(s):

a) (P. 16) When there are large loads (e.g., Ottawa Hospital, OC Transportation buses, etc.) driving the need for system expansion, please explain how Hydro Ottawa determines whether to require a capital contribution. As part of the response, please discuss how Hydro Ottawa determines whether to treat the costs associated with the request as an expansion vs. an enhancement.

b) (P. 49) Please discuss how the capital contributions in 2026-2028 were forecast.

c) (P. 49) Please confirm that all of the capital cost associated with the non-wires solutions is related to the utility owned BESS. Please provide a breakdown of the capital budget between each BESS installation. Please explain how the costs for each BESS was estimated (including a discussion of the RFP process, the technology selected, etc.).

d) (P. 50) For each of the station projects, please explain the methodology applied for estimating the costs. As part of the response, please provide the historical comparator projects that were considered in developing the cost estimates.

e) (PP. 51-52) For each of the distribution capacity upgrades, please explain the methodology applied for estimating the costs. As part of the response, please provide the historical comparator projects that were considered in developing the cost estimates.

2-CCC-30
Ref: Exhibit 2, Tab 5, Schedule 8, pp. 76, 88, 92

Question(s):

a) (P. 76) With respect to third-party poles, please explain how Hydro Ottawa is estimating the cost to purchase these poles. Please discuss whether the company has purchased third-party poles during the historical period (and at what price).

b) (P. 88) Please provide a table showing a more detailed breakdown for each of the distribution enhancement sub-program costs (i.e., Reliability, Enhancement, Observability, Resiliency) under each of the alternatives. For example, please breakout the costs for each of third-party pole ownership transfers, 13kV neutral ties and DER enablement in the system enhancement category.

c) (P. 92) Please advise whether the proposed undergrounding investments in the system resiliency sub-program is incremental to the activities to be undertaken in the pole renewal program.

d) (P. 92) Please reconcile Hydro Ottawa's proposed resilience-related investments of $36.3M with the conclusions of the Resilience Business Case (Exhibit 2, Tab 5, Schedule 4, Attachment E). Please explain specifically what investments Hydro Ottawa intends to make relative to the conclusions of the business case.

2-CCC-31
Ref: Exhibit 2, Tab 5, Schedule 9, p. 70

Question(s):

a) To the extent that fewer capacity expansion projects are approved for the CIR term, please confirm that there would be an expected reduction to the CCRA payments.

b) For each of the transmission connection projects, please provide the forecast CCRA payment and explain how the payment was estimated.

2-CCC-32
Ref: Exhibit 2, Tab 5, Schedule 9, p. 81

Question(s):

a) (P. 81) Please provide further details regarding Hydro Ottawa's methodology for forecasting Infrastructure and Cyber Security costs.

b) (P. 81) Please confirm that Hydro Ottawa owns and operates its own data centres. Please provide any analysis completed with respect to alternative options that do not require Hydro Ottawa to own and operate data centres.

2-CCC-33
Ref: Exhibit 2, Tab 5, Schedule 9, p. 120

Question(s):

a) (P. 120) Please further explain the methodology applied to estimate the number of vehicles that can be reduced through pooling initiatives.

b) (P. 125) In the context of rising vehicle replacement costs, please provide any analysis undertaken by Hydro Ottawa that compares ongoing maintenance costs relative to replacement costs for the vehicles currently owned by Hydro Ottawa.

Exhibit 3 – Operating Revenue

3-CCC-34
Ref: Exhibit 3, Tab 1, Schedule 1, pp. 2, 11, 21-22
Exhibit 3, Tab 1, Schedule 1, Attachment B, p. 22

Question(s):

a) (PP. 2, 22) Please provide a summary of the differences between the manner in which the revenue load forecast and capital planning load forecast were derived. As part of the response, please provide a table that highlights the outputs of each of these two forecasts in terms of demand for the 2026-2030 period.

b) (P.11) Please provide the kWh and kW impact of growth in residential heat pump installations for each year 2026-2030 (and as reflected in Tables 1, 2, 5, and 6).

c) (P. 11) Please reconcile the electric heat pump saturations shown in Table 9 to Figure 3-5 (Attachment B, p. 22).

d) (P. 11) With respect to new GS<50kW customers, does Hydro Ottawa's revenue load forecast reflect electric space heating?

e) (P. 21) Please explain, in detail how the energy adjustments for the residential rate class were derived. Please include all assumptions. If no eDSM adjustments were applied, how would this impact rates in 2026-2030?

Exhibit 4 – Operating Expenses

4-CCC-35
Ref: Appendix 2-JC

Question(s):

a) Please provide a revised version of Appendix 2-JC that includes an update to the forecasted 2024 and 2025 OM&A costs using the current best available information.

b) For each OM&A program listed in Appendix 2-JC, please provide, for each year in the 2021-2026 period, a breakdown of the total labour costs between Hydro Ottawa labour and contracted labour (e.g. contractors, consultants, etc.). Please also provide a discussion of any year-over-year changes in the proportion of work completed by Hydro Ottawa labour relative to contracted labour.

4-CCC-36
Ref: Exhibit 4, Tab 1, Schedule 1, Attachment 1, pp. 1, 7, 12-13

Question(s):

a) (P. 1) Please provide a single table that provides a breakdown between the software costs that were or will be capitalized and the software costs that were or will be expensed for each year during the 2021-2030 period.

b) (P.1) Please advise whether any of the cloud solutions implemented (or that will be implemented) have resulted in a direct offset to the capital budget. As part of the response, please discuss whether Hydro Ottawa expects that as it expands cloud computing solutions, the IT capital program will be reduced over time.

c) (P. 1) Other than the EAM and CRM cloud solutions, please provide any analysis completed related to other cloud solutions that were considered but are not proposed as part of the application.

d) (P. 7) Please file the "2022 assessment" that highlighted critical gaps impeding efficient asset management if not already filed with the application. If it is on the record, please provide a reference to this assessment.

e) (P. 12) With respect to the 2025 work related to the EAM program, please provide a status update and advise whether the schedule in Table 3 and the associated timing of the costs to be incurred in Table 4 remain accurate.

4-CCC-37
Ref: Exhibit 4, Tab 1, Schedule 2, pp. 12-14, 18-19

Question(s):

a) (PP. 12-14, 18) Please provide a more detailed breakout of the Testing, Inspection and Maintenance program budget for the 2021-2026 period (as shown in Table 6) using the activities set out in Table 5. Please also further describe the methodology applied for forecasting the costs in the test year.

b) (P. 12) Please provide the total number of cable chambers in Hydro Ottawa's service area. As part of the response, please provide a breakout between company-owned and customer-owned cable chambers.

c) (P. 12) Please provide the number of cable chambers that were previously inspected on a 10-year cycle and will now be inspected on a 5-year cycle.

d) (P. 12) Please advise whether Hydro Ottawa bills the specific owner for its maintenance and inspection activities related to a customer's cable chambers. If not, please explain why.

e) (P. 12) Please provide the number of poles that were previously inspected on a 10-year cycle and will now be inspected on a 5-year cycle.

f) (P. 13) Please further explain the operational expenses expected to be incurred related to the installation of FCIs discussed in Exhibit 2, Tab 5, Schedule 8 (p. 93).

g) (P. 16) Please provide any initial results available from the drone inspection pilot in 2025 and whether there are any implications for the 2026 budget. As part of the response, please discuss whether the use of drones is expected to reduce the need for physical inspections of overhead assets in the future.

h) (P. 19) Please confirm that the $2.8M budget for the NWS programming is related to the non-wire customer solutions.

4-CCC-38
Ref: Exhibit 4, Tab 1, Schedule 2, pp. 19-20, 22

Question(s):

a) (P. 22) Please provide a more detailed breakout of the vegetation management program budget for the 2021-2026 period (as shown in Table 7) using the categories of planned trimming, as-needed trimming and emergency vegetation management. Please also further describe the methodology applied for forecasting the costs in the test year.

b) (P. 19-20) Assuming Hydro Ottawa relies on contracted services for its vegetation management activities, please provide the term of its existing vegetation management contract (e.g., 2024-2026, 2023-2027, etc.). Please also explain the process that Hydro Ottawa undertook to enter the tree trimming contract. As part of the response, please provide details about the RFP, the number of bidders, the selection process, etc.

c) (P. 20) Please provide additional details regarding the rotation of planned tree trimming for defined geographical areas on a 5-year cycle. As part of the response, please provide the defined geographical areas, which area(s) were completed in each year of the historical period (2021-2025) and which area(s) are planned for the test year. Please also advise whether different contractors are used for different areas.

4-CCC-39
Ref: Exhibit 4, Tab 1, Schedule 2, pp. 22-25
Exhibit 9, Tab 1, Schedule 3, pp. 40-42

Question(s):

a) (Exhibit 4, Tab 1, Schedule 2, p. 24) Hydro Ottawa states that the implementation of Bill 93 has increased operational expenditures for Hydro Ottawa, due to the reliance on external service providers to ensure adherence to the legislated timelines. Please:

i) Provide the term of the existing contract (e.g., 2024-2026, 2023-2027, etc.)

ii) Explain the process that Oshawa Power undertook to enter the locates contract. As part of the response, please provide details about the RFP, the number of bidders, the selection process, etc.

iii) Discuss what happened with respect to the locates contact after Bill 93 was implemented.

iv) Explain the 5% annual escalation applied during the 2025-2026 period.

b) (Exhibit 4, Tab 1, Schedule 2, p. 25) Please explain what the inspection line item is referring to in Table 9. For the purposes of determining the actual locate costs incurred during April to December 2023 (and as recorded in the GOCA variance account), please explain how inspection costs are treated. Please also advise whether the locate costs recorded in the GOCA are entirely contractor costs or are Hydro Ottawa administrative costs also reflected.

c) (Exhibit 9, Tab 1, Schedule 3, p. 41) Please provide a reference to Hydro Ottawa's 2021 Rates proceeding showing where the OEB approved locate costs of $3M in the 2021 test year.

d) (Exhibit 9, Tab 1, Schedule 3, p. 41) Please provide a table showing the escalation of the approved 2021 locate cost to the 2023 approved locate cost.

e) (Exhibit 9, Tab 1, Schedule 3, p. 41) Please confirm that the actual locate costs incurred between April and December 2023 are based on the actual monthly costs incurred (and not a calculated amount – i.e., 9/12ths factor).

f) (Exhibit 9, Tab 1, Schedule 3, p. 41) Please explain why Hydro Ottawa applied the 9/12ths factor to determine the relevant materiality threshold for 2023.

4-CCC-40
Ref: Exhibit 4, Tab 1, Schedule 2, pp. 25-31

Question(s):

a) (P. 31) Please provide a more detailed breakout of the station maintenance program budget for the 2021-2026 period (as shown in Table 11) using the activities described in Table 10. Please also further describe the methodology applied for forecasting the costs in the test year.

b) (P. 30) Hydro Ottawa states that it has allocated additional funds for reactive maintenance to address unanticipated situations. Please provide the amount historically spent (2021-2025) on reactive station repair/refurbishment and the forecast amount for these same activities (2026-2030). Please advise whether these costs are treated as capital or OM&A (and in which specific program budget these amounts are reflected).

c) (P. 27) Please further describe what is involved in the decommissioning support for 4kV equipment and provide the total 2026-2030 cost of this activity.

4-CCC-41
Ref: Exhibit 4, Tab 1, Schedule 2, p. 33

Question(s):

Please provide a more detailed breakout of the distribution overhead and underground maintenance program budget for the 2021-2026 period (as shown in Table 12) using the activities described in the list on pages 31-32 (or at the level of granularity that is available to Hydro Ottawa). Please also further describe the methodology applied for forecasting the costs in the test year.

4-CCC-42
Ref: Exhibit 4, Tab 1, Schedule 2, p. 34

Question(s):

Please advise whether the efficiencies gained from the historical and forecast capital expenditures in AMI are reflected in the metering budget for the test year. If so, please provide the amount of savings reflected.

4-CCC-43
Ref: Exhibit 4, Tab 1, Schedule 2, p. 39

Question(s):

Please provide a more detailed breakout of the Engineering & Design program budget for the 2021-2026 period (as shown in Table 12) using the activities described in the list on pages 37-38 (or at the level of granularity that is available to Hydro Ottawa). As part of the response, please separate EAM platform costs and other software costs from the other line items.

4-CCC-44
Ref: Exhibit 4, Tab 1, Schedule 2, p. 44

Question(s):

Please provide a more detailed breakout of the Collections program budget for the 2021-2026 period (as shown in Table 18) with bad debt shown on a separate line item. Please also further describe the methodology applied for forecasting the costs in the test year (including the forecast for 2026 bad debt).

4-CCC-45
Ref: Exhibit 4, Tab 1, Schedule 2, pp. 45-46

Question(s):

Please provide a more detailed breakout of the Customer Billing program budget for the 2021-2026 period (as shown in Table 19) using the activities described in the first full paragraph on page 45 (billing (including postage, etc.), meter-to-cash processes, etc.). Please also further describe the methodology applied for forecasting the costs in the test year.

4-CCC-46
Ref: Exhibit 4, Tab 1, Schedule 2, pp. 46-47

Question(s):

a) Please provide a more detailed breakout of the Customer and Community Relations program budget for the 2021-2026 period (as shown in Table 20) using the activities described on page 46 (contact centre, administration of provincially-mandated programs). Please also further describe the methodology applied for forecasting the costs in the test year.

b) With respect to the customer contact centre, please discuss whether the contact centre is outsourced to a third-party and if it was outsourced, advise when it was outsourced.

4-CCC-47
Ref: Exhibit 4, Tab 1, Schedule 2, pp. 48-53

Question(s):

a) (P. 51) Please provide a more detailed breakout of the Information Management & Technology program budget for the 2021-2026 period (as shown in Table 21) using the activities described in the list on page 49. Please also further describe the methodology applied for forecasting the costs in the test year.

b) (P. 52) Please provide the costs of software subscriptions included in the Information Management & Technology program budget for each year of the 2021-2026 period.

c) (P. 52) Please discuss the extent to which the software licenses include support to Hydro Ottawa for the installation, use, troubleshooting, etc. of the licensed software.

4-CCC-48
Ref: Exhibit 4, Tab 1, Schedule 2, pp. 59-60

Question(s):

Please provide a more detailed breakout of the Facilities budget for the 2021-2026 period (as shown in Table 25) using the activities/taxes described in the list on page 59. Please also further describe the methodology applied for forecasting the costs in the test year.

4-CCC-49
Ref: Exhibit 4, Tab 1, Schedule 2, pp. 64-66

Question(s):

a) (P. 65) Please provide a more detailed breakout of the Corporate Costs for the 2021-2026 period (as shown in Table 28) using the activities described in the paragraph at the top of page 64. Please also further describe the methodology applied for forecasting the costs in the test year.

b) (P. 64) Please advise whether Hydro Ottawa's insurance coverage includes provisions for cyber security. If so, please describe those provisions.

c) (P. 64) Please explain the process that Hydro Ottawa undertook with respect to selecting its insurance policy. As part of the response, please provide details about the RFP, the number of bidders, the selection process, etc.

4-CCC-50
Ref: Exhibit 4, Tab 1, Schedule 3, pp. 4-5
Appendix 2-JC

Question(s):

a) (P. 4) Please provide the underlying data in tabular format that supports Figure 1.

b) (P. 5) Please provide a revised version of Table 1 that shows for every Appendix 2-JC OM&A program (whether or not there have been FTE additions during the period), the number of FTEs assigned to each program for each year 2021-2030. As part of the response, please also update the FTEs using the current best available information for the 2024 and 2025 bridge years (and update the 2026-2030 forecasts as necessary). Please also show each specific program that underpins "Distribution Operations" on separate lines.

4-CCC-51
Ref: Exhibit 4, Tab 1, Schedule 3, Attachment A, pp. 3-6

Question(s):

a) (PP. 3-4) With respect to forecasting compensation costs for the 2026 test year, please explain the methodology applied with respect to the application of merit increases to the previous year's base salary. If it is based on historical actual merit increases, please provide the average merit increase applied during the historical period in percent and also provide the total dollar value of the merit increases year-over year during the historical period.

b) (PP. 5) Please provide an update to Table 2 that reflects 2024 incentive pay.

c) (P. 5) Please provide the expected number of employees that will be eligible for incentive pay in 2025 and 2026.

d) (P. 4) Please provide the corporate and divisional priorities (and the related specific metrics) that are used to determine incentive pay.

4-CCC-52
Ref: Exhibit 4, Tab 1, Schedule 3, Attachment A, pp. 13, 15-17
Appendix 2-K

Question(s):

a) Please provide a revised version of Appendix 2-K that reflects 2024 actuals and the 2025 forecast using the current best available information. Please also make any necessary updates to 2026 based on the current best available information. As part of the response, please also provide the number of employees, total salary and wages (with a further breakout of overtime and incentive pay), total benefits and total compensation by the following categories: Executive, Management, Union, and Non-Union for each year 2021-2026.

b) Please explain how overtime-related compensation was forecast for the 2026 test year.

c) (P. 13) Please confirm that the temporary equivalents form part of the total FTEs shown in Appendix 2-K

d) (P. 16) Please provide a revised version of Table 10 that shows the actual vacancy-related reconciliation for the 2021-2023 period in the same format.

e) (P. 16) Please provide an updated version of Table 10 that provided the actual vacancy rate for 2024 using the current best available information.

f) (P. 16) Please explain how the forecast vacancy assumption of 8% for the 2025 and 2026 was determined.

g) (P. 17) Please explain how the number of forecast FTE vacancies (and offset by temp/part-time workers) is converted to compensation figures. As part of the response, please provide the detailed calculations that support Table 11.

h) (P. 17) Please provide the forecast reduction to 2026 compensation resulting from the application of a: (i)10% vacancy rate assumption; and (ii) 12% vacancy rate assumption.

4-CCC-53

Ref: Exhibit 4, Tab 1, Schedule 3, Attachment B, pp. 18-19

Question(s):

a) (P. 18) Please provide the analysis undertaken by Hydro Ottawa related to the comparison of operational demand hours (including the assumptions/methodology used to forecast operational demand hours) and internal labour supply.

b) (P. 19) Please provide the analysis (or internal documentation) associated with the rationalization process whereby Hydro Ottawa's executive management team reduced the "overall ask by 11.5%."

4-CCC-54

Ref: Exhibit 4, Tab 1, Schedule 3, Attachment C, pp. 13-14, 17, 21-23, 29-30

Question(s):

a) (PP. 13-14) Please provide the underlying data in tabular format that supports Figures 5 and 6.

b) (P. 17, 23) With respect to the installation and operation of BESSs, please provide a further explanation regarding the new skills/expertise required. As part of the response, please provide the number positions (or FTEs) that are being created specifically related to BESS-related projects/implementation.

c) (P. 21) With respect to the distribution system observability activities, please provide the number positions (or FTEs) that are being created specifically to support these initiatives.

d) (P. 22) With respect to the distribution system resilience program, please provide the number positions (or FTEs) that are being created specifically to support these initiatives.

e) (P. 29) With respect to cyber security, please provide the number positions (or FTEs) that are being created specifically to support these initiatives. As part of the response, please also discuss Hydro Ottawa's reliance on external services for cyber security support.

f) (P. 30) Please provide the number of positions (or FTEs) that are currently focused on cloud computing-related initiatives.

g) (P. 30) Please further discuss the "AI-driven" enhancements to customer service and the AI models for grid modernization and operational improvements. As part of the response, please discuss Hydro Ottawa's reliance on external services/software for customer service platforms.

4-CCC-55

Ref: Exhibit 4, Tab 2, Schedule 1, p. 1

Appendix 2-N

Question(s):

Please describe what activities are undertaken within Hydro Ottawa Energy Services Inc. Please fully describe all of the services Hydro Ottawa Holding Inc. and Hydro Ottawa Limited provide to Hydro Ottawa Energy Services Inc.

4-CCC-56
Ref: Exhibit 4, Tab 2, Schedule 1, p. 6

Preamble:

Hydro Ottawa Holding Inc.'s service costs to Hydro Ottawa are increasing from $3.8 million in 2021 to $7.7 million in 2026. The increase stems from several key factors including the demand for executive management time which has significantly increased.

Question(s):

a) Please set out the overall increase in executive management costs which are subject to the allocation, prior to the allocation, from 2021 to 2026.

b) If the demand for executive management are increasing for Hydro Ottawa Limited, have they decreased for the other entities? Please explain.

4-CCC-57
Ref: Exhibit 4, Tab 2, Schedule 1, p. 6

Question(s):

For each member of the Executive Management Team, please provide the percentage of their time allocated to Hydro Ottawa Limited for each year 2021-2026. Please explain why it is more cost-effective for Hydro Ottawa Limited to contract for the Executive Management Team, rather than having them as full-time employees and contracting their services to other related/affiliated companies.

4-CCC-58
Ref: Exhibit 4, Tab 2, Schedule 1, p. 6

Question(s):

Has Hydro Ottawa Limited or Hydro Ottawa Holding Inc. ever retained outside consultants to assess their overall corporate structure and the cost-effectiveness of that structure? If so, please provide the results of that work. If not, why not?

4-CCC-59
Ref: Exhibit 4, Tab 2, Schedule 2, p. 4

Question(s):

Please provide Table 1- Material Strategic Alliance, Sole Source and Directed Source Purchases for the years 2024-2025 and the budget for 2026. Please identify the cost categories where each of these purchases are accounted for.

4-CCC-60
Ref: Exhibit 4, Tab 2, Schedule 3

Preamble:

The one-time Regulatory Costs associated with the Application are $5.396 million as compared to $2.424 million for the last rebasing actual costs.

Question(s):

a) Please provide all assumptions used to develop this budget including the assumption for expert witness costs, legal costs, consultant's costs, intervenor costs, compensation costs and OEB Section 30 Costs.

b) Please explain why Regulatory One-Time legal costs are increasing from $136,000 to $950,000. Please provide all assumptions used to derive the 2026 budget.

c) Please explain what is included in "Compensation Costs" amounting to $613,900.

d) Please provide a table setting out expert witness costs, legal costs, consultant's costs, and compensation costs incurred to date.

4-CCC-61
Ref: Exhibit 4, Tab 2, Schedule 4, p. 2

Preamble:

On-going Regulatory Costs are increasing from $2.551 million in 2021 to $3.762 million in 2026.

Question(s):

a) Please confirm these costs are included in the overall 2026 OM&A budget envelope.

b) Please provide a detailed variance analysis between 2021 and 2026 with respect to the on-going regulatory costs.

4-CCC-62
Ref: Exhibit 4, Tab 2, Schedule 5, p. 2

Question(s):

What is the projected carryover of LEAP funds in 2026? Is the amount of funds available expected to exceed the demand?

Exhibit 5 – Cost of Capital

5-CCC-63
Ref: Exhibit 5, Tab 1, Schedule 1, pp. 7-8

Question(s):

a) (P. 7) Please advise whether the July 2, 2025 promissory note was entered into. If so, please provide the note.

b) (P. 8) Please provide the 2024 achieved ROE.

Exhibit 7 – Cost Allocation

7-CCC-64
Ref: Exhibit 7, Tab 1, Schedule 1, p. 11

Preamble:

Hydro Ottawa has introduced a new method to calculate in-house demand factors that reflect current and expected load requirements. Demand profiles for this Application have been based on an analysis of six-years historical load from 2018-2023.

Question(s):

Please explain why this new approach is appropriate.

7-CCC-65
Ref: Exhibit 7, Tab 1, Schedule 1, p. 11

Preamble:

The cost study initiatives undertaken by Hydro Ottawa shift $11.9 million in revenue requirement to the Residential customer class from the General Service, Large use and Street Light classes.

Question(s):

Please provide the residential bill impact resulting from the cost study initiatives.

Exhibit 8 – Rate Design

8-CCC-66
Ref: Exhibit 8, Tab 3, Schedule 2, pp. 1-5

Preamble:

Hydro Ottawa is proposing to increase its Standard Supply Service Administration Charge (SSS Charge).

Question(s):

a) Please set out, in detail, how the $6.7 million amount was derived.

b) Please demonstrate that these costs are incremental to the proposed OM&A costs and are not included in the proposed 2026 OM&A amounts.

c) Is Hydro Ottawa aware of any other LDCs that have proposed utility specific SSS Charges and obtained OEB approval for these charges? If so, please indicate which utilities have specific charges and what those charges are.

8-CCC-67
Ref: Exhibit 8, Tab 4, Schedule 2, p. 1

Preamble:

Generator Service Charges are declining in the 2026-2030 rate plan period.

Question(s):

To what extent are Hydro Ottawa's unregulated affiliates benefitting from these changes?

Exhibit 9 – Deferral and Variance Accounts

9-CCC-68
Ref: Exhibit 9, Tab 1, Schedule 3, p. 4

Question(s):

Please provide specific references to the applications, settlements and/or decisions where the OEB-approved gains/losses on utility property for the 2020-2023 period can be found.

9-CCC-69
Ref: Exhibit 9, Tab 1, Schedule 3, pp. 6-10

Question(s):

a) (P. 6) Please provide the evidence from the 2021-2025 application and settlement agreement showing the specific methodology applied and approved for the disposition of the 2016-2018 balances in the ESMVA.

b) (P. 8) Please provide a detailed explanation for each of the adjustments made in Table 3.

c) (P. 9) Please provide a detailed explanation for each of the adjustments made in Table 4.

d) (P. 10) Please explain the statement that "Hydro Ottawa proposes any resultant balance be returned to customers in accordance with the materiality levels described by the OEB for Group 2 Accounts." Please explain why a materiality threshold would be applied to overearnings.

9-CCC-70
Ref: Exhibit 9, Tab 1, Schedule 3, pp. 10-17

Question(s):

a) (PP. 10-11) Please confirm that for the 2016-2020 period, there were no CCRA payments reflected in the revenue requirement.

b) (P. 11) Please provide the evidence from the 2021-2025 application and settlement agreement showing the specific methodology applied and approved for the disposition of the 2017-2019 balances in the CCRADA.

c) (P. 14) Please explain the 2021 opening gross cumulative asset balance of $(588K).

d) (P. 14) Please provide the evidence from the 2021-2025 application and settlement agreement showing the approved CCRA payment amounts for the 2021-2023 period. Please also provide a comparison of the approved CCRA payments for each year during the 2021-2023 period relative to the actual payments for the same period.

9-CCC-71
Ref: Exhibit 9, Tab 1, Schedule 3, pp. 17-27

Question(s):

a) (P. 18) With respect to the capital accounts being tracked asymmetrically, please further describe and explain the methodology whereby amounts would only be recorded in the account until the actual cumulative net capital additions for 2021-2025 catch-up to the forecasted cumulative net capital additions. For each year in the 2021-2023 period, is Hydro Ottawa comparing actual annual net capital additions to approved annual net capital additions or does that comparison stop after a certain point?

b) (PP. 20, 22, 24) Please provide the evidence from the 2021-2025 application and settlement agreement showing the relevant approved net capital additions underpinning each of Table 12, 13 and 14 (for the 2021-2023 period). Please also provide a comparison of the relevant OEB-approved net capital additions for each year during the 2021-2023 period relative to the actual additions for the same period.

c) (P. 26) Please provide a table that compares the proposed net in-service additions value for the 2026-2030 period separated between the various CVA accounts/sub-accounts listed on page 26 (i.e., System Access & System Service - Symmetrical, System Access - Asymmetrical, System Renewal / System Service – Asymmetrical, and General Plant - Asymmetrical): (i) using the 2021-2025 approved version of the Capital Related Variance Account; and (ii) using the proposed 2026-2030 version of the Capital Related Variance Account (with the change to the treatment of commercial expansions and capacity upgrades).

9-CCC-72
Ref: Exhibit 9, Tab 1, Schedule 3, p. 31

Preamble:

Hydro Ottawa is seeking to clear $486,987.09 regarding the OEB Cost Assessment Variance Account.

Question(s):

Please provide a detailed calculation as to how this amount was derived.

9-CCC-73
Ref: Exhibit 9, Tab 1, Schedule 4, p. 9
Exhibit 6, Tab 1, Schedule 1, p. 4

Question(s):

a) Please explain the difference between the 2026 and 2027 PILs contributions shown in Table 4 (Exhibit 9, Tab 1, Schedule 4, p. 9) and the PILs contributions for the same years shown in Table 2 (Exhibit 6, Tab 1, Schedule 1, p. 4).

b) With respect to the treatment of the 2021 Immediate Expensing measure, please confirm that instead of treating the impact of this measure as a capital contribution, the $0.476M amount could be disposed of to ratepayers through the PILs and Tax Variance account.

9-CCC-74
Ref: Exhibit 9, Tab 3, Schedule 1, p. 4

Question(s):

a) For the Group 2 DVAs that have been previously disposed, please confirm that there has been no change to the allocation methodology (i.e., balances were allocated based on distribution revenues).

b) Please explain how locate costs reflected in rates were allocated to customer classes during the 2021-2025 CIR term.