INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

1-CO-1

EVIDENCE REFERENCE:

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]

QUESTION(S):

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.

RESPONSE(S):

a) The names of the Hydro Ottawa Holding Inc. Board of Directors and whether or not they are independent within the meaning of the *Affiliate Relationships Code for Electricity Distributors and Transmitters*, are listed in Table A - Hydro Ottawa Holding Inc. Board of Director Independence, below.

Table A - Hydro Ottawa Holding Inc. Board of Director Independence

Director Name	Independence
Bernie Ashe	Yes
Bryce Conrad	No
Catherine Clark	Yes
Matt Davies	Yes
Brian Doxtator	Yes
Laura Dudas	No
Jacqueline Gauthier	Yes
Allan Hubley	No
Melissa Kruyne	Yes
Paul McCarney	Yes
Madeleine Meilleur	Yes
Lynn Norton	Yes

b) The names of the Hydro Ottawa Limited Board of Directors and whether or not they are independent within the meaning of the *Affiliate Relationships Code for Electricity Distributors and Transmitters*, are listed in Table B - Hydro Ottawa Limited Board of Director Independence, below.

Table B - Hydro Ottawa Limited Board of Director Independence

Director Name	Independence
Bernie Ashe	Yes
Bryce Conrad	No
Laurie Heuff	No

c) Hydro Ottawa Holding Inc. is a wholly-owned holding corporation of the City of Ottawa. Hydro Ottawa Capital Corporation is a wholly-owned subsidiary of Hydro Ottawa Holding Inc. and Hydro Ottawa Limited is the local distribution company, a wholly-owned subsidiary of Hydro Ottawa Capital Corporation. See Figure 1 - Corporate Entities Relationship Chart of Schedule 1-6-1 - Corporate Structure and Governance.

d) The Hydro Ottawa Limited Board of Directors is primarily responsible for the direction of the business and affairs of Hydro Ottawa Limited, however the Hydro Ottawa Holding Inc. Board of Directors receive the materials provided to the Hydro Ottawa Limited Board of Directors and are kept informed of the business and affairs of Hydro Ottawa Limited, as its largest operating subsidiary.

e) The City of Ottawa provides direction to Hydro Ottawa Limited through the approval of City Council resolutions and within the confines of its authority under the Hydro Ottawa Holding Inc. Shareholder Declaration.

f) Hydro Ottawa has not received specific direction from the City of Ottawa on this matter, however see Hydro Ottawa's response to Interrogatory 1-PP-1(b) and (c) for a summary of how Hydro Ottawa is supporting City of Ottawa decarbonisation objectives.

g) The investment plan was approved by both the Hydro Ottawa Limited and the Hydro Ottawa Holding Inc. Board of Directors. The investment plan was not presented to or approved by the City of Ottawa.

h) On average, 87% of customers, across all rate classes, provided social permission to proceed with Hydro Ottawa's draft plan, evidence of which can be found on pages 4, 5, 15, and 16 of

Attachment 1-4-2(A) - Customer Engagement Report on Hydro Ottawa's 2026-2030 Rate Application, and on pages 4 and 5 and Table 2 of page 10 of Schedule 1-4-2 - Customer Engagement on the 2026-2030 Rate Application.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

1-CO-2

EVIDENCE REFERENCE:

QUESTION(S):

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

---

RESPONSE(S):

a) The utility is responsible for the connection of the Ottawa Hospital's New Civic Campus to its distribution system and for providing the New Civic Campus with safe and reliable power. Affiliate involvement in this project is an unregulated business activity which is not relevant to the issues in this proceeding.

b) This question is beyond the scope of this proceeding and relates to behind-the-meter activity which is not within the purview of the utility's rate-regulated business.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

1-CO-3

EVIDENCE REFERENCE:

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

QUESTION(S):

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.

RESPONSE(S):

Customer numbers are reported annually to the OEB as end of year values at December 31. To complete the requested tables, the total customers (start of year) is assumed to be the count on January 1, which matches to the total customer count value reported for RRRs of the prior year. Table 2 has been recreated as Table A for Historical Years and Table B with Bridge and Test Year values.

When preparing the Table, Hydro Ottawa discovered the value in Table 2 of Schedule 1-2-3 - Business Plan was inputted based on a preliminary year end value and has been updated below to match what was reported for RRRs.

Table A - 2016-2024 Yearly Increase in Customer Connections (with Total Customers)

Year	2016	2017	2018	2019	2020	2021	2022	2023	2024
New Customers	3,970	3,897	3,543	4,451	6,576	6,968	5,586	5,433	7,415
Total Customers (Start of the year)	323,910	327,880	331,777	335,320	339,771	346,347	353,315	358,901	364,334

Table B - 2025-2030 Yearly Increase in Customer Connections (with Total Customers)

Year	2025	2026	2027	2028	2029	2030
New Customers	3,891	3,669	3,630	3,735	3,820	3,860
Total Customers (Start of the year)	371,749	375,640[1]	379,309[2]	382,939[3]	386,674[4]	390,494[5]

[1] Values from revenue load and customer forecast, please see Schedule 3-1-1 - Revenue Load and Customer Forecast for further details
[2] Ibid.
[3] Ibid.
[4] Ibid.
[5] Ibid.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

1-CO-4

EVIDENCE REFERENCE:

Reference: CAFESOttawa_IR_AppendixA_HydroOttawaLetter_20250722

QUESTION(S):

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.

RESPONSE(S):

a) Hydro Ottawa is planning to support full electrification as its service territory moves in that direction, as described in Section 2.3.1 of Schedule 2-5-1 - Distribution System Plan Overview. As described in Section 2.1.4 of Schedule 2-5-1 - Distribution System Plan Overview, Hydro

Ottawa engaged Black & Veatch in 2023 to complete a study on the impacts of decarbonization on its grid. This Decarbonization Study was specifically undertaken to understand a variety of scenarios, including a full electrification scenario, aligning with the Energy Evolution Plan, ensuring Hydro Ottawa is prepared should the pace of electrification align with the 2050 decarbonization goals.

The study considered existing net-zero targets, existing legislation and policy focused on decarbonization, customer insights, as well as broader societal and market trends and adoption of technology such as EVs, heat pumps, etc. Five scenarios with varying assumptions of decarbonization initiatives were developed. These scenarios outlined the likely pace of decarbonization and electrification. The scenarios were reviewed by IESO's decarbonization sub-working group, and were presented to Enbridge and the City of Ottawa. Feedback from these groups was incorporated.

Based on these inputs and feedback, Hydro Ottawa determined that the Reference Scenario was the most likely scenario at this time. This scenario has informed medium and long term electrical demand forecasting.

However, this rate application only covers investment in the 2026-2030 period, and load forecasting is continuously reassessed. Investments outlined in this rate application will support continued electrical demand growth, from a variety of sources, including electrification, beyond 2030. Hydro Ottawa will monitor the pace of electrification and adjust load forecasting, and subsequent investment plans, accordingly.

b) Section 9.4.2 of Schedule 2-5-4 - Asset Management Process and Attachment 2-5-4(F) - Decarbonization Study outlines the five scenarios considered by Hydro Ottawa as part of the Decarbonization Study. Hydro Ottawa leveraged the Decarbonization Study's projections for the Reference Scenario to inform its medium to long-term forecast and this scenario does not limit customer electrification but rather enables it.

As explained in Section 9.4.2.1 of Schedule 2-5-4 - Asset Management Process, the Reference scenario is based on historical data and existing trends, and assumes increasing policy-driven decarbonization leading to electrification in the medium to long-term. This scenario was selected because in the Reference Scenario, the new electrification load forecast is characterized by a pace of decarbonization in the short-term which meets Canada's 2030 Emissions Reduction Plan and Canada's wider 2050 decarbonization goals.

c) Attachment 2-5-4(F) - Decarbonization Study outlines renewable energy resources that were taken into consideration for Hydro Ottawa's electrification scenarios. In addition, Section 9.2 of Schedule 2-5-4 - Asset Management Process details the steps being taken by Hydro Ottawa to assess non-wire solutions (NWS) such as Battery Energy Storage Solutions (BESS) to address system needs, and Section 9.3 of Schedule 2-5-4 - Asset Management Process details the system capability assessment for renewable energy and distributed energy resources (DERs). Hydro Ottawa will continue to monitor the trends and determine the feasibility of using these solutions to support electrification by 2050.

d) Please refer to part (a) of the response to interrogatory 2-Staff-42 for more details on Hydro Ottawa's forecasting methodology and the response to interrogatory 2.5-BOMA-2 for more details on Hydro Ottawa's methodology to develop the 2026 - 2030 capital expenditure plan. In essence, the investment plan was not determined directly by the scenarios detailed in the Decarbonization Study. Forecasted system capacity and the resulting capital expenditures were based on immediate system needs and committed load requirements. Investment decisions were further augmented by the IRRP Forecast (Based on the Reference Scenario), as Hydro Ottawa believes this to be the most likely scenario. Since the full electrification scenario (which Hydro Ottawa states as the "Policy-Guided Scenario" in Attachment 2-5-4(F) - Decarbonization Study) was not employed, its impact on capacity needs and associated capital expenditures cannot be assessed.

e) The City of Ottawa has not provided specific direction to Hydro Ottawa regarding the use of a scenario which supports a 76% electrification of space heating by 2050.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

1-CO-5

EVIDENCE REFERENCE:

QUESTION(S):

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.

RESPONSE(S):

As outlined in Schedule 6-3-4 - Other Operating Revenue, page 4, and Schedule 8-4-2 - Generation Charges, page 3, Hydro Ottawa stopped charging net metered customers the monthly net metering service charge, effective November 1, 2021, and is proposing to remove the monthly Net Metering service charge altogether to encourage net metering.

Net-metering is one rate option for owners of distributed energy resources (DERs) that are able to push generation back to the grid, such as solar panels. Hydro Ottawa actively engages and educates its customers on DERs and other clean energy solutions, including solar PV. Schedule 1-4-1 - Customer Engagement Ongoing outlines the comprehensive approach to customer engagement. Most relevant to the promotion of DERs include access to incentive programs, updates and in-depth blogs on Hydro Ottawa's website, articles in various newsletter (for residential, community, and commercial audiences), social media platforms, and thought leadership through industry and commercial magazines, industry events and conferences, and the ThinkEnergy podcast.

For additional information about activities Hydro Ottawa is undertaking to increase awareness and use of DERs, see the response to interrogatory 1-PP-7(e).

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

1-CO-6

EVIDENCE REFERENCE:

QUESTION(S):

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.

RESPONSE(S):

The bill impacts quoted for Toronto Hydro in the reference[1] above are the total bill impact for Residential of 2.4% and Small Commercial of 1.9%. The bill increases referenced for Hydro Ottawa are the distribution impact only. Hydro Ottawa's estimated average total bill for a residential customer is 3.23% while the small commercial total bill increase is estimated to be on average 2.32%.

However, to provide a stable comparison of the percentage increase solely due to change in distribution revenue requirements over the Custom IR term (distribution impact without temporary rate riders) please see Table A below.

[1] Ontario Energy Board, *Partial Decision and Order Toronto Hydro-Electric System-LTD Application for electricity distribution rates beginning January 1, 2025* (November 12, 2024) Page 1.

Table A - Average Residential Distribution Rate Increase Comparison

Over 5 Year Custom IR Term

		Average Five Year	
	Base Year Rate	$ Increase	% Increase
Hydro Ottawa	$34.26	$3.78	9.30%
Toronto Hydro	$45.30	$2.38	4.81%

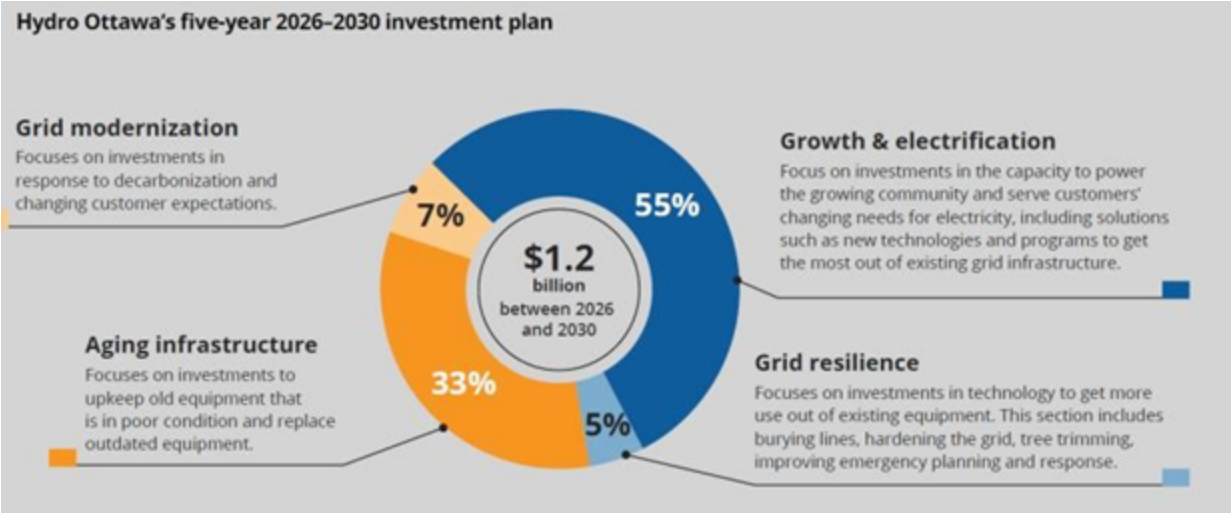
It is important to note, Toronto Hydro's Approved 2024 Residential fixed distribution rate was $45.30 compared Hydro Ottawa's 2025 Approved fixed distribution rate of $34.26. In addition, a similar dollar increase will compute a lower percentage increase when the historical rate is higher.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

1-CO-7

EVIDENCE REFERENCE:

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



QUESTION(S):

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.

RESPONSE(S):

a) Please refer to part a) of Hydro Ottawa's response to interrogatory 1-CO-4 for more details on Hydro Ottawa's plans to support full electrification as its service territory moves in that direction.

b) Please refer to Schedule 2-5-1 - Distribution Plan Overview Schedule 1 for updated Figure 2 - 2026-2030 Capital Expenditure by Investment Priority that slightly changed since the Customer Survey in September 2024. Table A below indicates the investments per year over the rate term proposed under each of the four categories.

Table A – Investment Under Plan Categories 2026-2030 ($'000 000s)

Primary Driver	Investment Category	Test Years									
		2026	%	2027	%	2028	%	2029	%	2030	%
	General Plant	$ 13,798	5%	$ 11,020	4%	$ 9,788	5%	$ 6,977	3%	$ 6,232	3%
	System Renewal	$ 67,510	26%	$ 69,592	26%	$ 65,807	30%	$ 70,889	30%	$ 81,613	37%
TOTAL AGING INFRASTRUCTURE		**$ 81,308**	**31%**	**$ 80,613**	**31%**	**$ 75,595**	**35%**	**$ 77,866**	**33%**	**$ 87,845**	**39%**
	General Plant	$ 1,093	0%	$ 886	0%	$ 1,043	0%	$ 638	0%	$ 637	0%
	System Renewal	$ 2,411	1%	$ 2,340	1%	$ 2,098	1%	$ 1,005	0%	$ 1,022	0%
	System Service	$ 9,894	4%	$ 13,962	5%	$ 13,958	6%	$ 16,387	7%	$ 9,982	4%
TOTAL GRID MODERNIZATION		**$ 13,397**	**5%**	**$ 17,189**	**7%**	**$ 17,099**	**8%**	**$ 18,030**	**8%**	**$ 11,641**	**5%**
TOTAL GRID RESILIENCE	System Service	**$ 11,905**	**5%**	**$ 13,649**	**5%**	**$ 12,366**	**6%**	**$ 12,289**	**5%**	**$ 12,189**	**5%**
	General Plant	$ 22,858	9%	$ 10,838	4%	$ 21,333	10%	$ 19,563	8%	$ 3,660	2%
	System Access	$ 42,202	16%	$ 35,656	13%	$ 28,977	13%	$ 35,476	15%	$ 30,917	14%
	System Renewal	$ 14,724	6%	$ 11,160	4%	$ 12,194	6%	$ 14,715	6%	$ 12,405	6%
	System Service	$ 76,140	29%	$ 95,078	36%	$ 49,353	23%	$ 57,246	24%	$ 64,741	29%
TOTAL GROWTH & ELECTRIFICATION		**$ 155,924**	**59%**	**$ 152,731**	**58%**	**$ 111,857**	**52%**	**$ 126,999**	**54%**	**$ 111,723**	**50%**
TOTAL ALL PRIMARY DRIVERS		**$ 262,534**	**100%**	**$ 264,182**	**100%**	**$ 216,916**	**100%**	**$ 235,185**	**100%**	**$ 223,398**	**100%**

c) Hydro Ottawa is committed to enabling the energy transition by modernizing the grid to facilitate customer participation, enable widespread electrification, and optimize the penetration and integration of DERs. While only 5% of the utility's capital investment plan is explicitly allocated to grid modernization, a significant portion of Hydro Ottawa's overall investments—across both capital and operational categories—contributes to this goal. These investments include capacity upgrades to increase capacity through various means, including Non Wire Solutions (NWS), grid technology programs, infrastructure and cyber security initiatives, metering renewal and digital customer engagement platforms. Expenditures under Grid Modernization are also in alignment with customer preferences as detailed in Schedule 1-4-2 - Customer Engagement on the 2026-2030 Application. Please refer to Section 3.4.2 of Schedule 2-5-4 - Asset Management Process for Hydro Ottawa's Grid Modernization Strategy.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

1-CO-8

EVIDENCE REFERENCE:

QUESTION(S):

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?

RESPONSE(S):

a) Given the highly dynamic and unpredictable nature of global trade policies and tariffs, conducting a specific forward-looking quantitative analysis with a high degree of precision would be subject to significant uncertainty and could be misleading. While Hydro Ottawa currently has not produced such a detailed analysis on the impact of tariffs on Capital and OM&A costs over the rate term, it did conduct a preliminary internal review to understand its potential exposure and support preparedness planning. This exercise focused on identifying categories of our expenditures most susceptible to tariff impacts. The analysis identified that approximately 80% of Hydro Ottawa's current material spend and 100% of automobile-related spend may be subject to tariffs. These findings, while based on a high-level review of existing procurement categories and tariff exposure risks, were sufficient to indicate a reasonable risk of a material financial impact related to tariffs. For this reason, Hydro Ottawa has requested a deferral account to address this risk, and we are actively engaging with vendors to get more granular data on their sourcing and costs.

b) Hydro Ottawa understands the importance of clearly distinguishing tariff impacts from other market fluctuations such as currency shifts, general inflation, and changes in supply/demand. Hydro Ottawa's primary mechanism for separating these factors, and thus ensuring the accuracy of the Tariff Impact Deferral Account, relies on itemized documentation from our suppliers. Vendors are actively being engaged to ensure that any costs directly attributable to imposed global tariffs are clearly identified as separate line items on their invoices or through specific contractual clauses.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

1-CO-9

EVIDENCE REFERENCE:

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]

QUESTION(S):

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

RESPONSE(S):

The 2023 result, which can be found in Table 18 on page 32 of Schedule 2-5-3 - Performance Measurement for Continuous Improvement was 0.63 and excludes loss of supply (from Hydro One) and Major event days. Including both Loss of Supply outages and Major Event Days the 2023 result was 1.48. As noted, Hydro Ottawa's System Average Interruption Frequency (SAIFI) results form the basis of the scorecard measure of the "Average Number of Times that Power to a Customer is Interrupted".

Attachment 1-4-1(E) - National Electricity Customer Satisfaction Report is a customer survey. The number referenced from this report shows the percentage of respondents who self-report that they encountered two or more outages in the past 12 months (the survey was completed from October 11 - December 12, 2023).

Table 4 on page 15 of Schedule 1-3-3 - Benchmarking shows whether Hydro Ottawa met the category target each year for the reported period and also presents the performance trend. The System Reliability measure “Average Number of Times that Power to a Customer is Interrupted” shows that Hydro Ottawa met that category target each year from 2019 - 2023, and improved its performance based on a five-year rolling trend. More details about Hydro Ottawa’s OEB Scorecard can be found in Section 5 of Schedule 1-3-3.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

1-CO-10

EVIDENCE REFERENCE:

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

QUESTION(S):

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.

RESPONSE(S):

a) Innovative Research describes their use of “Behind the Meter” throughout the survey, which was provided as Attachment F to Schedule 1-4-1 - Customer Engagement Ongoing. Specifically on page 2 it states, “The CEA’s Behind the Meter Survey is an exploration of Canadian attitudes toward new technologies that can help consumers better manage their energy use and enable an energy transition. The survey looked at remote-controlled devices, solar panels, storage and electric vehicles.” In addition, on page 12 a list of devices were included while acknowledging “we adjusted the wording slightly based on whether or not respondents are currently living in a home where they are able to install these types of technology”.

Hydro Ottawa notes that more generally, “Behind the Meter” is a colloquial term that refers to equipment or technologies, which are primarily customer owned and operated, located on the

customer's side of the utility electricity meter. Examples include EV chargers, roof-top solar PV systems, smart thermostats, etc.

b) Both solar and batteries were presented as separate technologies by the survey. A combined solar and battery system was not listed as an option in this survey. The survey was commissioned by the Canadian Electricity Association (now Electricity Canada). Hydro Ottawa did not provide input into specific options such as those referenced.

Please note that the survey was conducted from November 8 - December 20, 2021. At this time, the current eDSM programs did not exist, and there were no incentives for combined residential solar and battery storage systems.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

1-CO-11

EVIDENCE REFERENCE:

QUESTION(S):

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?

RESPONSE(S):

As described in Schedule 1-4-1 - Customer Engagement Ongoing, Hydro Ottawa engages with its customers in a variety of traditional and innovative ways. Promoting clean energy solutions, and the energy transition, is an important part of this engagement. Further, Attachment 1-4-1(B) - Customer Experience Strategy, outlines Hydro Ottawa's broader strategy to continue, as the opening sentence of that document states, "providing best-in-class customer service, including supporting shifting customer behaviours in a rapidly evolving energy landscape."

Two key aspects worth highlighting include:

Customer Education and Awareness:

Hydro Ottawa leverages its variety of engagement platforms to promote energy transition and clean energy information. This includes updates, in-depth blog posts, and articles in our newsletters (residential, community, and commercial audiences). Social media platforms are used to disseminate quick tips and news, and link to relevant content. Hydro Ottawa uses its ThinkEnergy

podcast to discuss leading, innovative aspects and solutions within the energy industry and energy transition, and features discussions with experts. Hydro Ottawa also created an interactive eco-home model, launched at the Ottawa International Airport in June 2024, and featured at the Ottawa Home and Garden show in March 2025. This physical model, along with its virtual tour and microsite[1] serve as a tangible example of energy-efficient technologies like solar panels, heat pumps, EV chargers, and battery storage, inspiring residents and offering practical insights into sustainable energy living. Hydro Ottawa also provides customers with tools, such as Green Button, and the MyAccount portal, to access their energy data to support decision making around energy efficiency and clean energy solutions. Hydro Ottawa plans to continue improving and expanding these tools, to provide additional energy insights, and also gain valuable analysis from customer meter data for its own forecasting and planning purposes.

Program Design and Delivery:

Hydro Ottawa actively seeks opportunities to develop and deliver customer focused programs designed to support customers in their own energy transitions. This includes Hydro Ottawa's key role in supporting the delivery of the Independent Electricity System Operator's eDSM incentive programing. For details of Hydro Ottawa's previous and ongoing role, please see Section 2.4.3 on page 38, and page 44 of Section 2.4.7 of Schedule 1-4-1 - Customer Engagement Ongoing. Examples of other programs include Hydro Ottawa's delivery of the NRCan funded Zero Emission Vehicle Infrastructure Program (ZEVIP), which supported the installation of 1,047 EV Charging ports across Hydro Ottawa's service territory. Additionally, Hydro Ottawa's ongoing delivery of the NRCan funded Deep Retrofit Accelerator Initiative program, locally titled the Ottawa Retrofit Accelerator, which supports commercial building with all phases of deep retrofits and energy efficiency upgrades aimed at decarbonization. For more details, see Schedule 1-4-1 - Customer Engagement Ongoing, Section 2.4.4, page 39.

Specific to the example provided in the question, Hydro Ottawa does not have direct charges for heat pumps or EV chargers that are installed behind the customer's meter. However, a customer may incur charges for service upgrades if the installation of these technologies necessitates an

[1] www.hydroottawa.com/ecohome

increase in the electrical service capacity to their property. Hydro Ottawa is committed to exploring cost-effective solutions for service upgrades and alternatives that help customers avoid or minimize these costs as they adopt clean energy solutions. This includes exploring the feasibility of emerging technologies like load sharing devices and modern, smart electrical panels. As these become more prevalent in the market, they have the potential to help customers manage peak demand and potentially avoid the need for cost based service and utility-side infrastructure upgrades. Further information on these technologies can be found in Hydro Ottawa's response to interrogatory 2-ED-13. Furthermore, as described in Schedule 6-3-5 - Other Income & Deductions page 3, Hydro Ottawa is proposing to offer Residential Electrical Isolations/Re-energizations for electrical work at no charge to the customer. This will help enable electrification and the adoption of distributed energy resources and back-up supply.

Hydro Ottawa also stopped charging net metered customers the monthly net metering service charge effective November 1, 2021 and is proposing to remove the net metering charge to encourage self generation in support of the grid. See schedule 6-3-4 - Other Operating Revenue, section 4.

Since 2019, Hydro Ottawa's design standards for new residential underground developments have been based on 200A service per household. While builders may still choose to install a 100A panel, Hydro Ottawa's design to this standard facilitates future customer electrification without cost based upgrades to Hydro Ottawa's existing distribution grid.

Further information about promoting net metering and DERs can be found in Hydro Ottawa's response to interrogatory 1-CO-5 and interrogatory 1-PP-7.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

1-CO-12

EVIDENCE REFERENCE:

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

QUESTION(S):

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.

RESPONSE(S):

a) The Ottawa Retrofit Accelerator is a program funded by Natural Resources Canada (NRCan)'s Deep Retrofit Accelerator Initiative, designed to help commercial, institution, and mid- to

high-rise residential buildings in Hydro Ottawa's service territory move forward with decarbonizing their buildings. Through the program, eligible participants can receive free guidance and support, participate in training opportunities, and receive subsidized Carbon Pathway Studies of their building to help identify energy and carbon reduction opportunities.

b) Please see Table A for information requested:

Table A - Ottawa Retrofit Accelerator Results

	2024 (April - Dec)[1]	2025 (Jan - June)
Number of Buildings Assessed through a Carbon Pathway Study	56	69
Energy Savings Identified (GJ/year)[2]	0[3]	121,986[3]
Energy Savings Achieved	This program is not permitted to fund implementation of measures	
Customer Incentives Provided[4]	$817,694.02	$732,019.95

c) The program is designed to encourage carbon focused deep retrofits, along with energy efficiency, in buildings, which align to the City of Ottawa's community decarbonization goals.

d) The contribution agreement with NRCan for program funding expires on March 31, 2027. Hydro Ottawa intends to spend the full program budget (funded by NRCan) within program timelines, and to meet its targets for building support. The Ottawa Retrofit Accelerator team is proactively engaging with building owners, and employing a marketing strategy to maximize outreach and interest in the program.

[1] Hydro Ottawa began its ORA program in April 2024.
[2] Combined gas and electricity savings. Note, these values are the sum of calculated potential net savings of all identified measures in funded studies. Implementation of these measures is up to building owners.
[3] While 56 Carbon Pathway Studies began in 2024, none had reached completion before Dec 31, 2024. Savings identified in completed studies that started in 2024 are included in the 2025 column.
[4] Funds approved and committed for carbon pathway studies.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

2-CO-13

EVIDENCE REFERENCE:

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

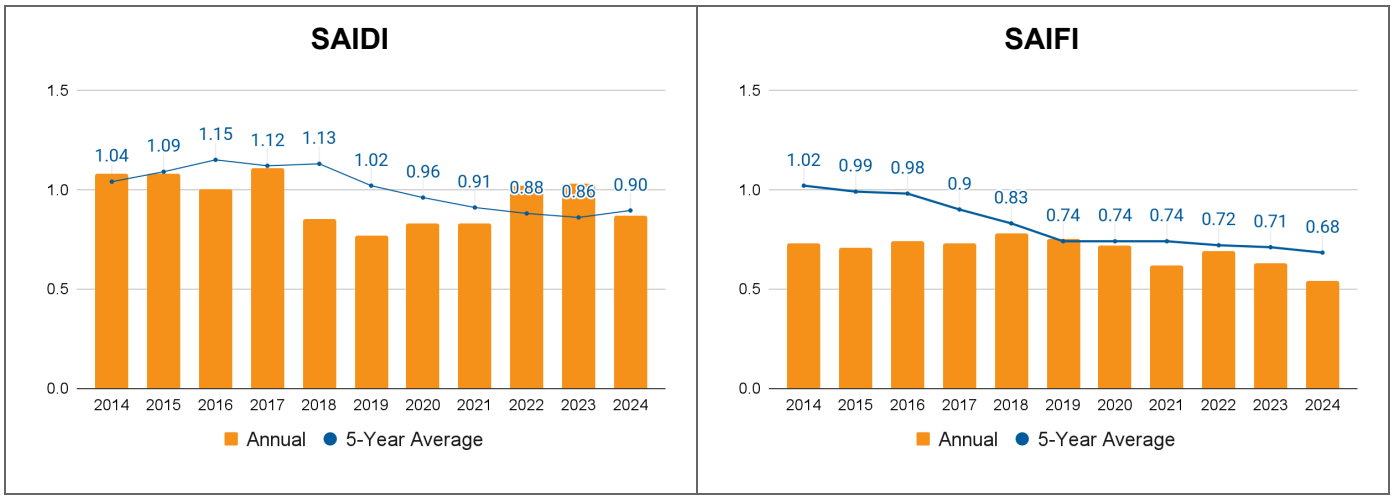
QUESTION(S):

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 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.

RESPONSE(S):

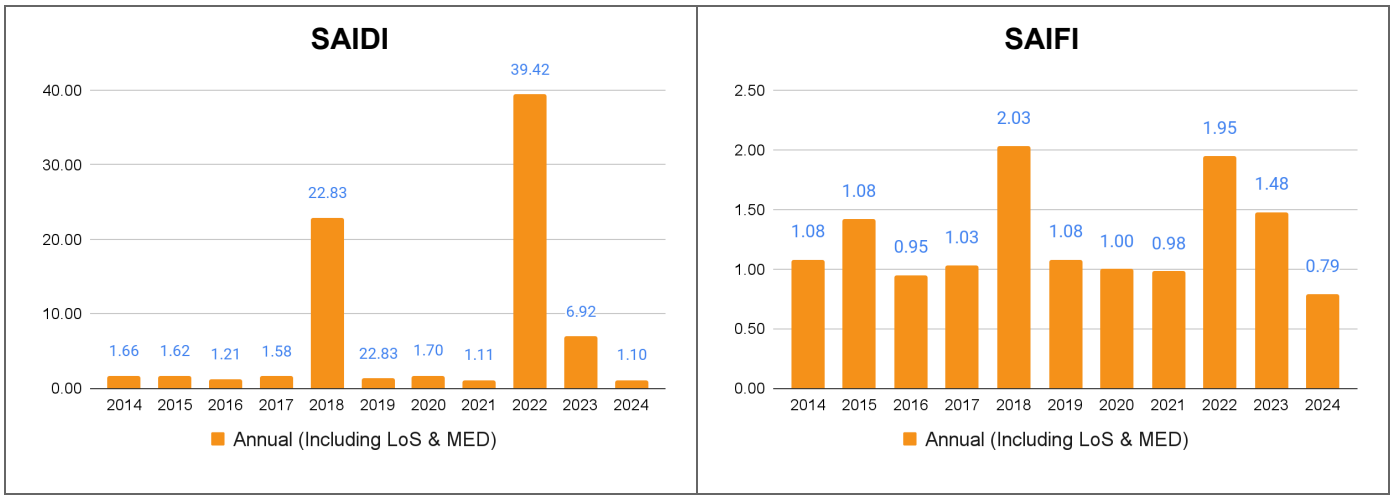
a) Please see Figure A - SAIDI & SAIFI - Annual and 5-Year Average (Excluding Loss of Supply and Major Event Days) below including 2024 Actuals.

Figure A - SAIDI & SAIFI - Annual and 5-Year Average (Excluding Loss of Supply and Major Event Days)



b) Figure B below shows Hydro Ottawa SAIDI & SAIFI graphs including Loss of Supply and Major Event Days.

Figure B - SAIDI & SAIFI - Annual (Including Loss of Supply and Major Event Days)



c) Hydro Ottawa defines Loss of Supply (LoS) as customer interruptions caused by issues on another distributor's system or the upstream transmission system, such as from its provider, Hydro One (Section 4.5 of Schedule 2-5-3 Performance Measurement for Continuous Improvement). A Major Event Day (MED) is identified using IEEE Standard 1366, with the

classification threshold determined annually from the previous five years of daily SAIDI values (Section 4.4 of Schedule 2-5-3 Performance Measurement for Continuous Improvement). Both definitions align with the Ontario Energy Board's (OEB) Reporting and Recordkeeping Requirements (RRRs), which are applied consistently across all utilities in Ontario.

d) In reference to Section 4.5 Performance by Cause Code of Schedule 2-5-3 - Performance Measurement for Continuous Improvement, Hydro Ottawa records all power interruptions in accordance with the primary cause definitions outlined in the OEB's RRRs. A detailed root cause analysis is performed on these interruptions, which allows for risk assessment and investment prioritization.

This analytical approach is crucial for accurately attributing outages to their specific causes, ensuring data is not improperly removed or added when an interruption happens close to a major event. The reliance on established standards, including IEEE 1366 and OEB's RRRs, provides clear methodologies for classifying and bounding major events versus other separate interruptions.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

2-CO-14

EVIDENCE REFERENCE:

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

QUESTION(S):

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.

RESPONSE(S):

a) Please refer to Schedule 2-5-4 - Asset Management Process. Within Section 3.1.2 of attachment 2-5-4(E) - Resilience Investment Business Case Report, it mentions the average major storm cost is approximately $7.6 million per storm in 2023 dollars. In contrast, Derecho's cost in 2023 dollars was $24.5 million. The amounts referenced include OM&A and capital costs, data from 2018 to 2023 was used for these purposes. Section 3.1 of that attachment

compares historical events impacting Hydro Ottawa customers reviewing high impact storms over the last 25 years. However, it should be noted that in May 2016 the Ontario Energy Board introduced Major Event reporting requirements and defined a major event. Therefore, data is only available from 2016 onward apart from the 1998 Ice Storm. Please refer to Section 4.4 Major Event Days in Schedule 2-5-3 - Performance Measurement for Continuous Improvements for a SAIDI comparison of Major Event Days from 2019 to 2023, an overview of Major Event Days from 2019-2023 and comparison to the 2022 Derecho. Please refer to Attachment 2-1-1(A) - May 2022 Derecho - After Storm Report for a detailed comparison between the Derecho and the 2018 Tornados.

b) For information on statistical analysis, please refer to the following included in the rate application submission:

- Schedule 2-5-4 - Asset Management Process, Attachment 2-5-4(B) - Addendum Report to Distribution System Climate Vulnerability Risk Assessment and Climate Change Adaptation Plan. Specifically, this information can be found in Section 2.1.4, Table 2. Appendix A of the same file has further information.

c) Hydro Ottawa has incorporated the financial impact and likelihood of severe weather events into its rate application through the following:

- Capital investments: As stated in Section 3.2 of Schedule 2-5-1 - Distribution System Plan Overview, the growing frequency and intensity of severe weather events necessitate sustained and strategic investment in infrastructure resilience. This imperative is reflected in the 2026-2030 forecasted capital investment program. Section 2.1.3 of the aforementioned Schedule lists the multi-faceted resilience measures that will be taken.
- OM&A: As stated in Section 2.1.1 of Schedule 9-1-3 - Group Accounts, Hydro Ottawa has not budgeted costs related to significant weather damages in USoA 4362, as such costs are unpredictable. However, Hydro Ottawa requires incremental OM&A funding to both prepare for and respond to severe weather events. Refer to Section 3.3 of Schedule 4-1-1 - Operations, Maintenance, and Administration for details. This includes (but is not limited to) vegetation management, information management and technology, engineering & design, system operations and 24/7 maintenance.

- Mechanisms for tracking unforeseen costs: This is included in Section 2.1 of Schedule 9-1-3 - Group 2 Accounts.

d) Hydro Ottawa purchases property insurance for its distribution infrastructure, administration buildings, and operations centres to provide financial protection against unexpected losses and damages. Hydro Ottawa's substations, administration buildings, and operations centres did not sustain damage during the May 2022 Derecho, and consequently, Hydro Ottawa did not make a claim against its property insurance policies.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

2-CO-15

EVIDENCE REFERENCE:

QUESTION(S):

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.

RESPONSE(S):

a) Hydro Ottawa employs a multi-layered approach to receive and address reliability and system outage customer complaints escalated through the City of Ottawa, including Councillors and the Mayor's office, ensuring these matters receive prompt attention. The process is managed by Hydro Ottawa's Chief Customer Officer division.

Hydro Ottawa's Government Relations and Communications and Public Affairs teams are responsible for sharing critical updates on major outages, key infrastructure projects and other relevant matters directly with the Mayor's office and City Councillors via regular updates and scheduled meetings to ensure municipal officials are well-informed to disseminate information to their constituents.

A dedicated email address also exists to help manage Councillors' and Mayor's office inquiries into Hydro Ottawa. Upon receipt, each inquiry is logged in a case management system. Key information is recorded, as well as steps taken to resolve the inquiry until completion.

The Key Accounts team manages relationships with Hydro Ottawa's largest customers, which notably includes the City of Ottawa itself. They serve as a direct point of contact for the City of Ottawa (as a customer) to discuss operational needs and address potential impacts of extreme weather events and outages on municipal operations (e.g. water treatment plants). See Schedule 1-4-1 - Customer Engagement Ongoing, Section 2.3 for further details of the Key Accounts team's role.

This structured process ensures that concerns escalated by the City of Ottawa are handled with priority, investigated by the correct subject matter experts, and responded to in a clear, accountable, and timely manner.

b) Hydro Ottawa received a total of 72 customer complaints through the City of Ottawa (i.e. Councillors' and Mayor's offices). A complaint is defined as an instance where a customer expresses dissatisfaction or registers an issue.

To categorize the nature of power-related concerns, Hydro Ottawa utilizes specific complaint categories: 'Power Interruption - Planned' for scheduled outages, 'Power Interruption - Unplanned' for unexpected disruptions. 'Power Quality' for issues like voltage fluctuations or surges, and 'Power Reliability' for broader concerns about electricity supply consistency and dependability. Please see Table A below for a breakdown of the number of complaints by year and complaint category.

Table A - Reliability and System Outage Customer Complaints Received From City of Ottawa

Category	2021	2022	2023	2024	TOTAL
Power Interruption - Planned	5	2	6	6	**19**
Power Interruption - Unplanned	5	8	5	6	**18**
Power Quality	1	0	1	1	**3**
Power Reliability	1	4	21	6	**32**
TOTAL	**12**	**14**	**33**	**13**	**72**

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

2-CO-16

EVIDENCE REFERENCE:

QUESTION(S):

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.

RESPONSE(S):

a) All infrastructure, including critical infrastructure, maintains N-1 redundancy, as detailed in section 5.2.2.2 of Schedule 2-5-4 - Asset Management Process, ensuring reliability of power supply even if one asset fails (e.g. feeder, station transformer). While multiple asset failure redundancy isn't guaranteed, customers can request and fund additional redundancy. Refer to Section 2.4.1 of Hydro Ottawa's Conditions of Service for more information.

b) Hydro Ottawa does not specifically track multi-story dwellings with vulnerable residents dependent on elevators for mobility or electricity for medical purposes. Hydro Ottawa does maintain a list of customers who self identify as Critical Care customers, which allows for a longer notice period when facing disconnection for non-payment. It does not impact response during emergency situations, including unplanned outages. More details can be found in Section 1.6 of Hydro Ottawa's Conditions of Service.

Hydro Ottawa maintains relationships with many large property management companies who maintain multi-unit residential buildings, through its Key Accounts team. Coordination and information-sharing during outages is a function of the Key Accounts team.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

2-CO-17

EVIDENCE REFERENCE:

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]

QUESTION(S):

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.

RESPONSE(S):

a) Hydro Ottawa commissioned a comprehensive Decarbonization Study that evaluated the potential impacts of societal electrification trends on Hydro Ottawa's distribution system, projecting outcomes through 2050 using five different scenarios that include projections for electric vehicles, electrified heating, and transit electrification. Section 2.1.4 of Schedule 2-5-1 - Distribution System Plan Overview outlines the decarbonization study that Hydro Ottawa undertook to support medium to long-term forecasting. Hydro Ottawa utilized the

Decarbonization Study's Reference Scenario forecast to inform the IESO's Integrated Regional Resource Plan (IRRP) forecast. The Reference Scenario represents a moderate pace of decarbonization that still meets Canada's 2030 Emissions Reduction Plan and wider 2050 decarbonization goals, but with a more tempered approach in the short term compared to the Policy-Guided Scenario which assumes 100% electrification. These comprehensive inputs ensure that our regional planning is robust and directly contributes to the City of Ottawa's ambitious decarbonization targets.

b) Please see Section 4 of Schedule 2-5-2 - Coordinated Planning with Third Parties, and more specifically Section 4.3.1, for details on Hydro Ottawa's coordination with the City of Ottawa through the IRRP and IESO Decarbonization Sub-Working Group.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

2-CO-18

EVIDENCE REFERENCE:

QUESTION(S):

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?

RESPONSE(S):

Please refer to the response to part a) of interrogatory 2-Staff-108, as well as the response to interrogatory 2-PP-16.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

2-CO-19

EVIDENCE REFERENCE:

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

QUESTION(S):

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.

RESPONSE(S):

a) Hydro Ottawa does not currently have utility-owned Battery Energy Storage Systems (BESS) in service for peak load management. However, the utility is proposing a new BESS program for the 2026-2030 period.

BESS offer a flexible and responsive solution to increase capacity and manage peak demand. They work by storing surplus energy during off-peak hours and discharging it back into the grid during periods of high demand. This effectively "shaves" demand peaks, allowing Hydro Ottawa to optimize existing grid assets, enhance overall system efficiency, and improve resilience.

For more details on the proposed uses of BESS, refer to Section 9.2.2.2.1 of Schedule 2-5-4 - Asset Management Process.

For an overview of how the proposed BESS have reduced the need for incremental traditional capital solutions, refer to part (e)(iii) of the response to interrogatory 2-Staff-111.

b) The basis of the statement “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” is not clear. Hydro Ottawa has proposed the inclusion of BESS solutions, as described in Section 9.2 of Schedule 2-5-4 - Asset Management Process, where there is a clearly articulated system need that can be effectively addressed through BESS, as outlined in response to part (a) above.

c) Hydro Ottawa does not accept the premise of the question, as Hydro Ottawa's position is that there is no conflict with the current approach to DERs, predicated on the intended use of these assets. Hydro Ottawa intends to utilize the BESS (as noted in the response to part (a) above) for specific, non-competitive distribution services - i.e. providing capacity to the distribution grid, voltage support and reliability enhancement. Hydro Ottawa will adhere to OEB guidance and directives on utility ownership of DERs, and respond accordingly should the principals change.

Hydro Ottawa's approach to DER ownership models and the potential for conflicts of interest, can be understood by considering the distinctions outlined in the DNV Consultant Report - Considerations For Establishing DSO Capabilities in Ontario, Final Report, Ontario Energy

Board, dated May 12, 2025.[1] The core of the perceived conflict of interest, as highlighted in the DNV report (Section 3.1.2, Page 19), arises when a utility-owned DER participates in "DSO flexibility markets alongside 'independent' DERs." In such scenarios, concerns emerge that the utility might prioritize its own assets, leverage its financial position for preferential terms, or engage in "double-dipping" by recovering costs through regulated rates while also earning revenue from market participation. The DNV report further clarifies that if a utility uses its BESS in a capacity auction, this would constitute a conflict. However, if the BESS is used for a distribution service (e.g., providing capacity to the distribution grid), then it does not present a conflict.

d) Hydro Ottawa is committed to the successful implementation of the proposed Non-Wires Customers Solutions Program. The individual programs identified within the portfolio were chosen for several reasons, including a relatively low barrier to market entry in addition to the collaborative opportunities that are available with the IESO, building on previous collaborative work (refer to Section 2.4.3 of Schedule 1-4-1 - Asset Management Process). Additional rationale informing the selections is available in part (b) of the response to interrogatory 2-Staff-55. Please also refer to interrogatory 2-Staff-67.

The estimated contributions from the proposed NWS are outlined in Table A. Note that the BESS contribution is allocated to the proposed year of energization (see part (c) of the response to interrogatory 2-Staff-111) and the Non-Wires Customer Solutions are aimed to achieve a total by the end of 2030, within the target regions and because of several external factors, including the pursuit of collaboration with the IESO, the advancement of DER technologies, and customer adoption rates. There are no year-over-year estimates at this time. The estimated contribution from the NWS in Table 4 of Schedule 2-5-8 - System Service Investments can also be found in Table 33 and Table 36 of Schedule 2-5-4 - Asset Management Process.

For the estimated utility costs associated with the BESS projects please refer to part (c)(iii) of the response to interrogatory 2-Staff-111.

[1] https://www.rds.oeb.ca/CMWebDrawer/Record/898403/File/document

Table A - MW Contribution from NWS

Solution	2026	2027	2028	2029	2030
BESS Total			**7.5MW**	**14.5MW**	**24.5MW**
West 28kV			2.5MW		
Bells Corners / Bayshore 8kV				7MW	
Casselman 8kV			5MW		
Core 13kV, West 13kV					10MW
Non-Wires Customer Solutions Total	**20-30MW**				
West 28kV	10-15MW				
Core 13kV, West 13kV	10-15MW				

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

2-CO-20

EVIDENCE REFERENCE:

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]

QUESTION(S):

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.

RESPONSE(S):

a) The 2026-2030 Capital plan does not envisage investment in gas or diesel RECIPs to address potential sub-station overloads.

b) No, Hydro Ottawa has not evaluated the business case nor completed financial modelling for joint ownership models where third parties, including community investors, invest in NWSs. Hydro Ottawa is still in the early stages of exploring third-party services and is continuously learning about the different models and programs that could provide value within the service territory. Hydro Ottawa has not yet determined the potential value of entering into joint ownership models with third parties as there are many aspects to evaluate, such as cost-sharing responsibilities, obligations, risks and potential conflicts of interest (please see part (c) of the response to interrogatory 2-CO-19 for further detail). Hydro Ottawa will continue to evaluate all potential arrangements as the opportunities arise to meet grid needs.

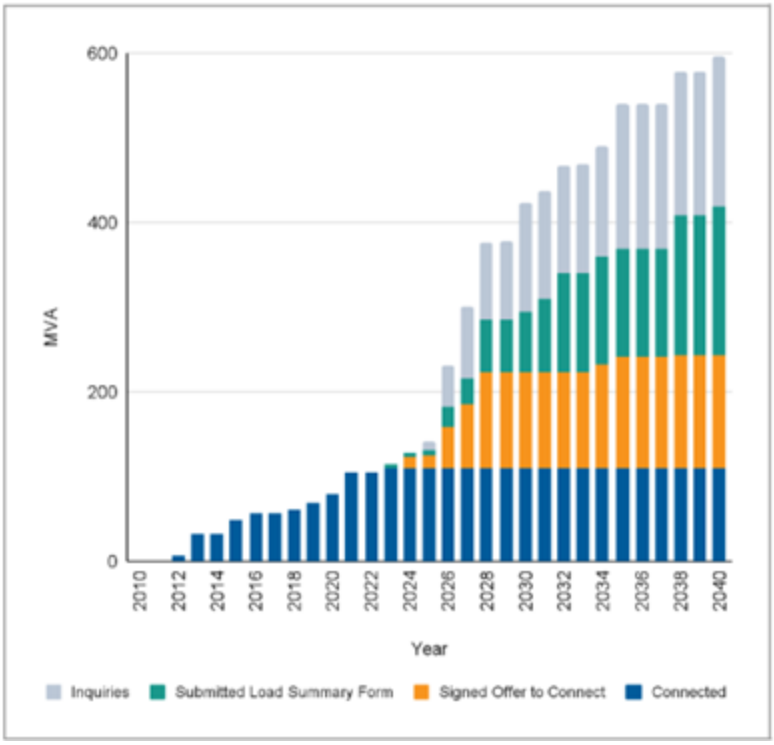
INTERROGATORY RESPONSES TO ONTARIO ENERGY BOARD STAFF

2-CO-21

EVIDENCE REFERENCE:

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

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



QUESTION(S):

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.

RESPONSE(S):

a) Please see below the definition of each category in Figure 4 of Schedule 2-5-1 - Distribution System Plan Overview.

- **Inquiries** refers to the initial stage where a potential customer contacts Hydro Ottawa to discuss connecting a large load. These are discussions without any firm commitment.
- **Submitted Load Summary Form** refers to the stage where a formal evaluation of the customer's intended load for connection to the grid is performed based on the load requirements submitted by the customer. In Figure 4, this category represents a more defined, though still non-binding, stage compared to inquiries, showing a growing MVA over time.
- **Signed Offer to Connect** is the point at which the customer makes a binding commitment to connect their load to Hydro Ottawa's grid. As depicted in Figure 4, this category indicates a more solidified commitment with increasing MVA over time.

- **Connected** refers to the final stage where the customer's site is formally energized, and the connection process is complete. In Figure 4, this category represents the realized and active large load connections.

b) Please see Table A below for the summary by years of types of Large Load customers. Highlighted in yellow is Data Center requests.

Table A – Large Load breakdown *(cumulative demand MVA)*

Stage	TYPE	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040
Inquiries	Commercial	0	0	0	0	0	0	14	14	14	14	14	14	14	14	14	14	20
	Data Centre	0	5.6	11.2	45.5	51.1	51.1	51.1	51.1	51.1	51.1	51.1	61.1	61.1	61.1	61.1	61.1	61.1
	Education Campus	0	0	15.6	15.6	15.6	15.6	15.6	15.6	15.6	15.6	15.6	15.6	15.6	15.6	15.6	15.6	15.6
	Hospital	0	0	0	0	0	0	8	8	8	8	8	8	8	8	8	8	8
	Mixed Use	0	0	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14
	Residential	0	4.5	6.7	11.2	11.2	11.2	15.6	15.6	15.6	15.6	17.8	17.8	17.8	17.8	17.8	17.8	17.8
	Transportation Electrification	0	0	0	0	0	0	10	10	10	10	10	40	40	40	40	40	40
Signed Offer to Connect	Commercial	5.6	5.6	5.6	11.2	11.2	11.2	11.2	11.2	11.2	11.2	11.2	11.2	11.2	11.2	11.2	11.2	11.2
	Government Facility	2.9	3.7	3.7	25.7	31.3	31.3	31.3	31.3	31.3	31.3	39.5	39.5	39.5	39.5	39.5	39.5	39.5
	Hospital	0	0	0	0	32.1	32.1	32.1	32.1	32.1	32.1	32.1	32.1	32.1	32.1	33.9	33.9	33.9
	Transportation Electrification	4.6	4.6	38.6	38.6	38.6	38.6	38.6	38.6	38.6	38.6	38.6	48	48	48	48	48	48
Submitted Load Summary Form	Commercial	0	0	10.6	10.6	10.6	10.6	10.6	10.6	10.6	10.6	10.6	10.6	10.6	10.6	10.6	10.6	10.6
	Education Campus	0	0	0	0	0	0	6.7	20	33.3	33.3	33.3	33.3	33.3	33.3	33.3	33.3	33.3
	Government Facility	0	0	0	2.2	32.1	32.1	32.1	32.1	46.5	46.5	53.5	53.5	53.5	53.5	90.3	90.3	90.3
	Hospital	5	7	11	12	12	12	12	12	12	12	13	13	13	13	13	13	24
	Residential	0	0	3.3	4.4	6.6	7.7	9.9	11	13.2	14.3	16.5	17.6	17.6	17.6	17.6	17.6	17.6
Grand Total		**18.1**	**31**	**120.3**	**191**	**266.4**	**267.5**	**312.8**	**327.2**	**357.1**	**358.2**	**378.8**	**429.3**	**429.3**	**429.3**	**467.9**	**467.9**	**484.9**
% related to Data Centres		0%	18%	9%	24%	19%	19%	16%	16%	14%	14%	13%	14%	14%	14%	13%	13%	13%

c) In terms of probability analysis, Hydro Ottawa has incorporated large loads into its planning forecast based on two key stages that demonstrate a higher level of commitment:

- Signed Offer to Connect: These represent large loads for which the customer has made a binding commitment to connect to Hydro Ottawa's grid. The existence of a signed offer signifies a high probability of materialization, as it is a formal agreement.
- Submitted Load Summary Form: These are large loads for which customers have submitted a formal evaluation of the load they intend to connect. While not yet a binding commitment, the submission of this form indicates a serious intent and a significant step in the connection process, thereby assigning a higher probability of these loads coming to fruition compared to initial inquiries.

Inquiries, on the other hand, are treated distinctly. As detailed in Section 9.1.4 of Schedule 2-5-4 - Asset Management Process, these initial customer outreaches are trended separately. This separate trend serves to provide Hydro Ottawa with an understanding of the overall "pipeline" of potential future large loads and their possible addition to the long-term forecast. However, due to their preliminary nature and lack of formal commitment, these inquiries have not yet been formally added to the current planning forecast. This approach allows Hydro Ottawa to monitor nascent interest and potential future growth without prematurely committing resources based on less certain prospects.

d) Hydro Ottawa allocates costs based on three primary categories: transmission needs, station needs, and distribution needs.

For transmission needs, cost apportionment is based on the Transmission System Code. Hydro One runs a Discounted Cash Flow (DCF) mechanism for Hydro Ottawa and the large load customer separately, based on load forecasts, to determine the large load customer's contribution to the transmission upgrade.

For station needs, a percentage of the station's cost is apportioned to the customer as per Section 3 of the Distribution System Code. This percentage is directly proportional to the

customer's load requirements relative to the total capacity of the station. This ensures that customers contribute to the station infrastructure in accordance with their utilization.

For distribution expansions as per Section 3 of the Distribution System Code and Hydro Ottawa's Conditions of Service, the cost apportionment varies depending on the specific requirements as explained below:

- If dedicated feeders are required to serve the large load customer, then 100% of the cost for these dedicated feeders is borne by the customer. This is because these assets are solely for the customer's benefit.
- However, if there are incremental costs for overbuilds, such as constructing a standard underground duct system where not all ducts will be immediately utilized by the specific customer, or installing a higher-foot pole to accommodate additional circuits based on overall system needs rather than solely the customer's immediate demand, then these incremental costs are borne by Hydro Ottawa. This approach recognizes that such infrastructure enhancements benefit the broader system and future growth, not just the individual customer.
- When an existing distributor-owned asset needs to be replaced to connect a customer before its end of life, Hydro Ottawa runs advancement cost calculations to charge the remaining net book value plus the advancement cost.

Finally, all these calculated cost apportionments for the customer are then subjected to an economic evaluation based on the methodology described in Appendix B of the Distribution System Code. This evaluation determines the ultimate customer's capital contribution, ensuring a fair and economically sound allocation of costs.

e) Yes, the loads noted above were assumed to be concurrent peak loads.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

2-CO-22

EVIDENCE REFERENCE:

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.

QUESTION(S):

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?

RESPONSE(S):

a) Hydro Ottawa interprets the question to read as “Has Hydro Ottawa assessed opportunities for the development of renewable energy generation, in-front-of-meter within its service area?”.

Through participation in the IESO’s Regional Planning Process, as described in Section 4 of Schedule 2-5-2 - Coordinated Planning with Third Parties, local DER/NWS solutions, including

in-front-meter renewable generation were considered. The IESO published IRRP report,[1] issued on July 31st, 2025 takes both wires and non-wires into consideration.

Hydro Ottawa's NWS assessment considered various solutions to address system capacity needs. The assessment criteria for NWS and the different scenarios identified where NWSs would have the greatest potential in supporting capacity needs are described in Section 9.2.1 of Schedule 2-5-4 - Asset Management Process. The assessment concluded that Battery Energy Storage Systems (BESS) provide the most robust and reliable support for Hydro Ottawa's operational needs. Given the immediate requirement for firm, reliable capacity during system peaks and contingencies, and the inability of intermittent sources like solar to meet this need without additional storage for dispatching, no further assessment was conducted on solar or other intermittent sources.

The Decarbonization Study, submitted in Hydro Ottawa's application as Attachment 2-5-4(F) - Decarbonization Study, and further outlined in Section 9.4.2.1 of Schedule 2-5-4 - Asset Management Process, provides an assessment of the impact of decarbonization initiatives on Hydro Ottawa's distribution system through 2050. The assessment considered viable options for supporting the projected load growth, including non-wires solutions (see page 57 of Attachment 2-5-4(F) - Decarbonization Study). In the evaluation solar was ruled out as a viable option due to the large amount of land per MW required and its reduced effectiveness during winter with the observed shift in peak.

b) Please see the response a) above. Renewable in-front-of-the-meter energy generation was not a viable option in Hydro Ottawa's evaluation of the solutions to meet the identified needs (see Section 9 of Schedule 2-5-4 - Asset Management Process). Hydro Ottawa has not currently planned for the implementation of these types of facilities or programs, including subscription-based community solar. Existing regulation in Ontario permitting community net metering projects is currently limited in scope and restricted to one prescribed demonstration

[1] https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/Greater-Ottawa/Ottawa-Area-20250731-IRRP.pdf

project.[2] It is important to note that Hydro Ottawa has historically supported advocacy for community net metering projects, with examples of this being found in Hydro Ottawa's letter to Ministry in October 2022,[3] as well as its submission to the Ministry's proposed changes to support Community-Based Energy Systems in November 2020.[4] Hydro Ottawa will continue to monitor needs and evaluate all viable solutions, and will also continue to engage in discussions regarding regulatory frameworks. Hydro Ottawa welcomes the opportunity for continued coordination between the IESO, the OEB, and distributors in engagements such as the Local Generation Program (LGP) and the OEB's work on DSO capabilities consultation, given the unique opportunity these present to unlock greater system value by enabling resources to participate in programs that benefit both the bulk system and the local distribution system.

[2] As per Schedule 1 of O. Reg. 679/21, currently the only prescribed project is the West Five project located in London, Ontario.
[3] https://www.orec.ca/post/letter-to-minister-of-energy-requesting-permission-for-community-net-metering-2022.
[4] ERO #019-2531 - Hydro Ottawa submission (November 22, 2020): https://prod-environmental-registry.s3.amazonaws.com/public_uploads/2020-11/Hydro%20Ottawa%20Comments%20-%20Community%20Net%20Metering%20Proposal%20.pdf

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

2-CO-23

EVIDENCE REFERENCE:

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.

QUESTION(S):

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 many ULOTOU customers also have:
   - Solar net-metering,
   - EV's,
   - Heat Pump's,
   - Home batteries

RESPONSE(S):

a) Hydro Ottawa currently has 2,077 customers enrolled in the Ultra-Low-Overnight (ULO) rate plan as at June 30th 2025.

b) Hydro Ottawa has 54 net-metered customers on the ULO rate plan as at June 30th 2025. Based on information provided by customers, the total combined generation capacity of these net-metered solar PV systems is approximately 530kW.

c) Since the current 54 ULO rate and net metering customers are spread across the city without any noticeable patterns, there is no immediate impact on Hydro Ottawa's feeder lines. However, a significant increase in participation in the new ULO Time-of-Use rates could potentially affect Hydro Ottawa's local feeder lines and the wider electricity grid.

Hydro Ottawa recognizes that ULO rates are a tool designed to optimize the use of the existing grid and influence customer behavior in a way that ultimately supports grid efficiency. While it aims to reduce overall peak strain, Hydro Ottawa will continuously monitor and adapt its local feeder line infrastructure to accommodate the evolving load patterns on the feeders driven by these new rates and/or the broader trend of electrification.

d) The 54 ULO rate and net metering customers are geographically dispersed throughout the city, with no discernible concentration pattern.

e) Although some public data is available for penetration of EVs, as described in Hydro Ottawa's response to part (a) of interrogatory 2-ED-25, Hydro Ottawa does not have visibility at the account level into other behind-the-meter devices such as heat-pumps, EVs, or batteries, and so is unable to identify how many customers on the ULO rate plan have these devices.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

2-CO-24

EVIDENCE REFERENCE:

QUESTION(S):

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.

RESPONSE(S):

a) Hydro Ottawa has not declined any requests for Distributed Energy Resources (DERs) during the current 2021-2025 term. In instances where a DER connection was sought on a restricted feeder or station, Hydro Ottawa collaborated with the proponent to identify and implement acceptable alternatives.

b) Hydro Ottawa adheres to all Ontario Energy Board (OEB) mandated timelines for connecting DERs. The typical timeframe for a DER project, from the initial request submission to final commissioning, is approximately 10 to 12 months. This duration is subject to the complexity of the individual project and notably excludes periods where responses are pending from the DER proponent.

INTERROGATORY RESPONSES TO COMMUNITY ACTION FOR ENVIRONMENTAL SUSTAINABILITY

2-CO-25

EVIDENCE REFERENCE:

QUESTION(S):

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.

RESPONSE(S):

a) Hydro Ottawa has considered three data center requests. Please refer to part b) of the response to interrogatory 2-CO-21 for the demand forecast for this category.

b) At this point eDSM or other demand management measures have not been applied to the data center demand forecast. This is because new data centres often incorporate energy efficiency into their load requirements when requesting service upgrades from Hydro Ottawa for additional needs. Hydro Ottawa continues to work with customers to understand their load requirements and how to best serve their needs. Furthermore, Hydro Ottawa's Demand Side Management team is actively engaging with a wide range of customers, including customers looking to bring on new data centre loads and looking to retrofit or expand their existing data centres to identify specific incentives and pathways for data centres to participate in provincial eDSM programs. Hydro Ottawa is also advancing non-wires solutions that benefit customers through local

programs, specifically the Non-Wires Customer Solutions Program (please refer to Section 9.2.2.1 of Schedule 2-5-4 - Asset Management Process) and will continue to investigate new opportunities for customer-facing programs as demand on the system continues to grow. For more details on these engagement activities, refer to Section 2.4 Conservation and Demand Management of Schedule 1-4-1 - Customer Engagement Ongoing.