



Via RESS

August 18, 2025

Mr. Ritchie Murray, Acting Registrar
Ontario Energy Board
PO Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Mr. Murray:

**Subject: Hydro Ottawa Limited (Hydro Ottawa)
Custom Incentive Rate-Setting (Custom IR) Application for 2026-2030
Electricity Distribution Rates and Charges - Interrogatory Responses
OEB File: EB-2024-0115**

Pursuant to Procedural Order No. 1 as issued on June 3, 2025, and correspondence issued by the OEB on August 12th and 15th, Hydro Ottawa submitted interrogatory responses to all intervenors over the course of August 12-14, 2025 except OEB Staff, which was filed on August 18, 2025.

Hydro Ottawa received 577 interrogatories, not including subsections, from 10 parties:

- OEB Staff ("Staff")
- Building Owners and Managers Association ("BOMA")
- Community Action for Environmental Sustainability ("CO")
- Consumers Council of Canada ("CCC")
- Distributed Resource Coalition ("DRC")
- Environmental Defence ("ED")
- Energy Probe Research Foundation ("EP")
- Pollution Probe ("PP")
- School Energy Coalition ("SEC")
- Vulnerable Energy Consumers Coalition ("VECC")

Pursuant to the OEB's Practice Direction on Confidential Filings, Hydro Ottawa, under separate cover letter, has requested confidentiality for certain information and to redact certain information from the public record which is not relevant to the proceeding.

During the preparation of its interrogatory responses, Hydro Ottawa identified certain items in its Original Filing that require correction. Accordingly, a table of revisions has been included as Appendix A of this cover letter.

Should you have any questions, please do not hesitate to contact me.



Sincerely,

Signed by:

April Barrie

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April Barrie

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APPENDIX A**Table of Revisions (Filed August 18, 2025)**

Original Evidence Reference	Related Interrogatory Response(s)	Description	As Originally Submitted ¹	As Revised ²
Exhibit 1 - ADMINISTRATION				
1-2-3 - Business Plan	1-CO-3	Hydro Ottawa discovered the value in Table 2 of was inputted based on a preliminary year-end value and has been updated to match RRR reporting for total customer count value.	New Customers 2023: 5,496.	New Customers 2023: 5,433;
Attachment 1-3-3(D) - Supplemental Industry Benchmarking Analysis	1-SEC-21	An error was identified in the calculation of the industry averages for long-term debt for the years 2020 and 2021, where one utility was mistakenly left out of the calculation of the industry average.	Attachment 1-3-3 (D) Table 15 - Hydro Ottawa vs. Industry and Peer Group Weighted Average Cost Of Debt, page 22. Industry Average 2020: 4.16% Industry Average 2021: 3.34%	1-SEC-21 Table B - page 2. Industry Average 2020: 4.35% Industry Average 2021: 3.39%

¹ References the evidence as originally filed, unless otherwise noted.

² Details of the revision can be found in the Interrogatory Response listed, unless otherwise noted.

Original Evidence Reference	Related Interrogatory Response(s)	Description	As Originally Submitted ¹	As Revised ²
1-3-4 - Facilitating Innovation and Continuous Improvement	1-SEC-24	Updated productivity benefits for 2021-2025 & 2026-2030 are based on revisions to: 3.1.1 - Distribution Capital Program Delivery Optimization: 1-SEC-26, 3.1.5 - Major Projects Consulting Procurement: 1-SEC-25 & 3.2.2 - Online Billing Enhancements 1-SEC-27. Please see below for details.	<p>Table 1 - Summary of Productivity Benefits of 2021-2025 and 2026-2020 Initiatives, page 1.</p> <p>2021-2025: Capital Expense: \$23.2M Capital Depreciation: \$1.1M OM&A: \$14.5M Services to Third Parties:\$0.9M</p> <p>2026-2030: Capital Expense: \$35.1M Capital Depreciation: \$3.0M OM&A: \$27.2M Services to Third Parties: \$1.9M</p>	<p>Table A - Summary of Updated Productivity Benefits of 2021-2025 and 2026-2020 Initiatives, page 1.</p> <p>2021-2025: Capital Expense: \$22.8M Capital Depreciation: \$0.8M OM&A: \$14.7M Services to Third Parties: \$0.9M</p> <p>2026-2030: Capital Expense: \$33.9M Capital Depreciation:\$2.5M OM&A: \$27.3M Services to Third Parties: \$1.9M</p>

Original Evidence Reference	Related Interrogatory Response(s)	Description	As Originally Submitted ¹	As Revised ²
1-3-4 - Facilitating Innovation and Continuous Improvement (cont'd)	1-SEC-25	Hydro Ottawa noticed that the depreciation for productivity benefits for 3.1.5 - Major Projects Consulting Procurement and 3.1.6 - Vendor and Supplier Engagement depreciation were overstated, Hydro Ottawa recalculated the productivity savings. This also reflects a revision to 3.1.1 - Distribution Capital Program Delivery Optimization per 1-SEC-25.	<p>Table 2 - Labour and Supply Chain Optimization Initiatives (Quantifiable)</p> <p>3.1.1 - Distribution Capital Program Delivery Optimization</p> <p>Regular Time - Capital Expense 2021-2025: \$12,936k 2026-2030: \$20,337k</p> <p>Regular Time - Capital Depreciation 2021-2025: \$431k 2026-2030: \$678k</p> <p>Overtime - Capital Expense 2021-2025: \$3,982k 2026-2030: \$4,146k</p> <p>Overtime - Capital Depreciation 2021-2025: \$133k 2026-2030: \$138k</p> <p>3.1.5 - Capital Depreciation 2026-2030: \$295K</p> <p>3.1.6 - Capital Depreciation 2021-2025: \$436k 2026-2030: \$436k</p>	<p>Labour and Supply Chain Optimization Initiatives (Quantifiable)</p> <p>Table A - 2021-2025 Table B - 2026-2030</p> <p>3.1.1 - Distribution Capital Program Delivery Optimization</p> <p>Regular Time - Capital Expense 2021-2025: \$12,620k 2026-2030: \$19,321k</p> <p>Regular Time - Capital Depreciation 2021-2025: \$421k 2026-2030: \$644k</p> <p>Overtime - Capital Expense 2021-2025: \$3,883k 2026-2030: \$4,023k</p> <p>Overtime - Capital Depreciation 2021-2025: \$129k 2026-2030: \$134k</p> <p>3.1.5 - Capital Depreciation 2026-2030: \$278k</p> <p>3.1.6 - Capital Depreciation 2021-2025: \$87k 2026-2030: \$0</p>

Original Evidence Reference	Related Interrogatory Response(s)	Description	As Originally Submitted ¹	As Revised ²
	1-SEC-26	Table 3 - Distribution Capital Program Labour Efficiency 2021-2030. Projects under System Expansion and Residential Subdivision in the System Access investment category were erroneously included in the analysis.	Table 3 - Distribution Capital Program Labour Efficiency 2021-2030.	Table J - Revised Internal Labour Savings.
		Correction of an understatement of Account Overdue Notice (AON) savings.	Table 4 - Innovation and Digital Transformation Initiatives (Quantifiable) 2021-2025 = \$6,274 2026-2030 = \$5,375	Table A & B- Innovation and Digital Transformation Initiatives (Quantifiable). 2021-2025 = \$6,394 2026-2030 = \$5,495
1-3-4 - Facilitating Innovation and Continuous Improvement (cont'd)	1-SEC-27 (a)	Correction of an understatement of AON savings. Also in SEC-27: "After submitting the 2026-2030 Rate Application, it was noticed that 3.2.2 Online Billing Enhancements excluded \$24k per year in savings. Hydro Ottawa has recalculated the productivity savings and these changes are reflected in the amounts below.	Table 5 - Breakdown of Productivity Benefits for Online Billing and Account Overdue Notices page 26. AON 2021-2025 = \$0.5 2026-2030 = \$1.2 2021-2025 = \$6.3 2026-2030 = \$5.4	Table C - Breakdown of Productivity Benefits for Online Billing and Account Overdue Notices and Table D - Breakdown of Productivity Benefits for Online Billing and Account Overdue Notices, page 6. AON 2021-2025 = \$0.6 2026-2030 = \$1.3 2021-2025 = \$6.4 2026-2030 = \$5.5
Exhibit 2 - RATE BASE				
Schedule 2-5-1 - Distribution System Plan Overview, p. 53, line 7	2-EP-1	Correction of a typographical error.	Feedback was obtained from 21,839 customers during this phase.	21,839 customers

Original Evidence Reference	Related Interrogatory Response(s)	Description	As Originally Submitted ¹	As Revised ²
Schedule 2-5-2 - Coordinated Planning with Third Parties	2-SEC-36	Hydro Ottawa acknowledges a discrepancy between the energization date and the actual capital expenditure and in-service additions forecast for the Cyrville station project. In Table 19 of Schedule 2-1-1, Cyrville station was not included as a project as part of significant in-service additions and was inadvertently excluded from rate base as a result.	Page 15	As noted in the response to interrogatory 1-Staff-1, given the timing of discovering this error Hydro Ottawa has not adjusted the revenue requirement and bill impacts for this error and will do so at a later stage in the application.
Schedule 2-5-4 - Asset Management Process, p. 187	2-Staff-64	The original evidence introduced the term “power surge” which does not by itself introduce unforeseen disruptions or abnormal system states and should not have been included in the referenced sentence	Primarily, it significantly reduces the system's flexibility to effectively manage both planned maintenance and operational activities, as well as respond to unforeseen disruptions or abnormal system states, such as equipment failures, power surges , or extreme weather events.	Primarily, it significantly reduces the system's flexibility to effectively manage both planned maintenance and operational activities, as well as respond to unforeseen disruptions or abnormal system states, such as equipment failures or extreme weather events.
Schedule 2-5-5 - Capital Expenditure Plan, Table 26, pages 79-80	2-Staff-75 (e)	Hydro Ottawa identified a correction for the description of the Distribution System Resiliency Budget Program, with the primary resiliency driver.	This initiative will reduce outage times and improve system reliability using new assets that provide real-time condition data, loading data, and fault-finding capabilities.	Enhancements to the distribution system's resilience, enabling it to better withstand and rapidly recover from extreme weather or unexpected events. This includes undergrounding of overhead lines, hardening existing overhead lines, relocating lines, and reconfiguring feeders.
Schedule 2-5-7 - System Renewal	2-Staff-90, 2-SEC-49	There was an error in the number of units in the Station Switchgear (Replacement) row	Table 4 2029 - 14	Table 4 2029 - 0

Original Evidence Reference	Related Interrogatory Response(s)	Description	As Originally Submitted ¹	As Revised ²
Investments		of Table 4 - Detailed Unit Replacement and Removal (through EOL voltage conversion) Overview per Station Asset Class on page 29	2030 - 14	2030 - 0
	2-CCC-25 (d) 2-Staff-94	There was an error in the Incremental Resilience Investments row, Alternative 3 column of Table 11 - Summary of Program Investments of Alternatives Considered.	\$1.6M/year	\$1.8M/year
	2-CCC-28	Hydro Ottawa notes an error on Page 163, line 6 of Schedule 2-5-7, regarding the number of UG transformers planned for replacement under emergency renewal.	The critical renewal budget considers the replacement of 75 poles each year and 10 UG transformers, while the emergency renewal budget accounts for the replacement of 25 poles and 40 UG transformers.	The critical renewal budget considers the replacement of 75 poles each year and 10 UG transformers, while the emergency renewal budget accounts for the replacement of 25 poles and 65 UG transformers.
Schedule 2-5-8 -System Service Investments, p. 35, 38, and 41	2-Staff-111 (c) (iv)	Hydro Ottawa notes an error on energization dates on three proposed BESS systems.	West 28kv: 2030 Energization Bells Corners / Bayshore 8kv: 2030 Energization Casseknan 8kv: 2030 Energization	West 28kv: 2028 Energization Bells Corners / Bayshore 8kv: 2029 Energization Casseknan 8kv: 2028 Energization Refer to Table B in the referenced IR for a Breakdown of BESS Major Activities.
Schedule 3-1-1 - Revenue Load and Customer Forecast	3-DRC-10	The Battery Electric and Total LDEV row in Table 10 - New LDEV Registrations in Ontario, page 16 of Schedule 3-1-1 double counted Plug-In Hybrid Electric (PHEV) for 2019-2023 also resulting in % New LDEV	% New LDEV: 2019: 1.63% 2020: 2.14% 2021: 3.94% 2022: 7.49%	% New LDEV: 2019: 1.23% 2020: 1.75% 2021: 3.14% 2022: 6.50%

Original Evidence Reference	Related Interrogatory Response(s)	Description	As Originally Submitted ¹	As Revised ²
		being incorrect in the Table	2023: 9.10%	2023: 7.40%
	3.0-VECC-28 (b)	Correction of a typographical error on the average annual growth trend of LDEV.	The 2021-2023 average annual growth trend of 0.8% was used to estimate the total LDEV for 2024-2030.	The 2021-2023 average annual growth trend of 1.8% was used to estimate the total LDEV for 2024-2030.
Attachment 3-1-1 (B) -Hydro Ottawa Long-Term Electric Energy and Demand Forecast	3-CCC-34 (b)	The Heat Pump Saturation percentages were incorrect in Attachment 3-1-1(B) - Figure 3.5 - Residential Heat Pump Saturations, page 22, as well as on Table 9 - Residential Heat Pump Saturation, page 11 of Schedule 3-1-1 Revenue Load and Customer Forecast	Table 9 - Residential Heat Pump Saturation percentages: 2024: 7.6% 2025: 7.7% 2026: 7.9% 2027: 8.0% 2028: 8.2% 2029: 8.4% 2030: 8.5%	Table C - Heat Pump Saturation Percentages 2024: 4.4% 2025: 4.6% 2026: 4.7% 2027: 4.9% 2028: 5.0% 2029: 5.2% 2030: 5.3%
Schedule 4-1-2 - Operations, Maintenance and Administration Program Costs, page 21.	4-Staff-139	To correct wording from implementation to use of Overstory, Hydro Ottawa confirms that the solution was implemented in 2023 after a pilot test in 2022	"The implementation of the Overstory solution will facilitate precise risk assessment"	"The use of the Overstory solution will facilitate precise risk assessment"
	4-Staff-143	Revised description for variance explanation of 2022 vs 2023, on page 37, in Section 3.7 - System Operations & 24/7 Maintenance.	"Costs from 2022 to 2023 decreased by \$1.3M as a result of \$2.4M less spent on reactive maintenance for in-year storm damage, with an offset of \$1.1M increased costs associated with the 2023 strike."	"The costs from 2022 to 2023 decreased by \$1.3M, primarily driven by a reduction in reactive maintenance expenditures."
Attachment 4-1-3(B) - Workforce Planning Strategy	n/a	Certain percentages in Figure 9 - New Positions by Workforce Segment, 2024, on page 21 were corrected due to error in	Certified & Skilled Trades - 24.0% Designated & Technical Professionals - 52.0%	Certified & Skilled Trades - 48.0% Designated & Technical Professionals - 32.0%

Original Evidence Reference	Related Interrogatory Response(s)	Description	As Originally Submitted ¹	As Revised ²
		classification of some of the net new positions. No change to Operational Support & Administration, and Senior Management segments.	Front Line Leadership - 8.0%	Front Line Leadership - 4.0%
	n/a	Percentages in <i>Figure 10 - New Positions by Workforce Segment, 2024-2030, page 22</i> were corrected due to error regarding classification of net new positions.	Certified & Skilled Trades - 32.8% Designated & Technical Professionals - 49.7% Front Line Leadership - 6.8% Operational Support & Administration - 5.7% Senior Management - 5.1%	Certified & Skilled Trades - 35.9% Designated & Technical Professionals - 45.20% Front Line Leadership - 7.34% Operational Support & Administration - 7.91% Senior Management - 3.95%
Attachment 4-1-3(C) - Workforce Growth	n/a	Percentages in <i>Figure 1 - New Positions by Workforce Segment, 2024-2030</i> , corrected due to error regarding classification of net new positions. Figure is also provided as Figure 10 in 4-1-3(B).	Certified & Skilled Trades - 32.8% Designated & Technical Professionals - 49.7% Front Line Leadership - 6.8% Operational Support & Administration - 5.7% Senior Management - 5.1%	Certified & Skilled Trades - 35.9% Designated & Technical Professionals - 45.20% Front Line Leadership - 7.34% Operational Support & Administration - 7.91% Senior Management - 3.95%
	n/a	Certain Percentages in Table 3 - Operations New Positions by Workforce Segment, on page 5 were corrected for 2024.	Certified & Skilled Trades: 12 Designated & Technical Professionals: 23 Front Line Leadership: 3	Certified & Skilled Trades: 24 Designated & Technical Professionals: 13 Front Line Leadership: 1
	n/a	Percentages in Table 3 - Operations New Positions by Workforce Segment, on page 5 were corrected for 2026.	Certified & Skilled Trades: 28 Designated & Technical Professionals: 28 Front Line Leadership: 5 Senior Management: 2 Operational Support & Administration: 5	Certified & Skilled Trades: 21 Designated & Technical Professionals: 30 Front Line Leadership: 8 Senior Management: 0 Operational Support & Administration: 9

Original Evidence Reference	Related Interrogatory Response(s)	Description	As Originally Submitted ¹	As Revised ²
	4-CCC-54	Figures 5 & 6 were incorrectly titled.	Figure 5 - 2021-2025 Gross Operations Expenditures by Object page 13	Table A - 2021-2025 Gross Operations Expenditures by Distribution Programs , page 2
			Figure 6 - 2026-2030 Gross Operations Expenditures by Object page 14	Table B - 2026-2030 Gross Operations Expenditures by Distribution Programs , page 2
4-2-1 (A) - OEB Appendix 2-N - Shared Services and Corporate Cost Allocation	4-CCC-57 1-Staff-1(A) - 2-N - Corp Cost Allocation	Appendix 2-N in 2024 the Corporate Cost Allocation percentages were incorrect.	Legal: 14% Board of Directors: 45%	Legal: 40% Board of Directors: 70%
Attachments 7-1-1(A) - OEB Workform - 2026 Cost Allocation Model to (E) OEB Workform - 2023 Cost Allocation Model	1-Staff-1	Hydro Ottawa discovered a computational error in the development of demand profile data input to Tab I8 Demand Data of the models.	7-1-1 (A) OEB Workform - 2026 Cost Allocation Model - Tab I8 Demand Data to 7-1-1 (E) OEB Workform - 2030 Cost Allocation Model - Tab I8 Demand Data	Attachment 1-Staff-1 (H) 2026 Cost Allocation Model, Tab I8 Demand Data to Attachment 1-Staff-1 (L) 2030 Cost Allocation Model, Tab I8 Demand Data

Original Evidence Reference	Related Interrogatory Response(s)	Description	As Originally Submitted ¹	As Revised ²
Attachments 7-1-1 (A) OEB Workform - 2026 Cost Allocation Model to (E) OEB Workform - 2030 Cost Allocation Model: Schedule 7-1-1 - Cost Allocation, Sections 4.1.2 Billing and Collection and 4.3 17.2 Meter Reading	7.0-VECC-52	Hydro Ottawa discovered an error in the identification of vendor costs in the calculation of billing and collecting and meter reading weighting factors.	7-1-1 (A) OEB Workform - 2026 Cost Allocation Model - Tab I5.2 Weighting Factors and Tab I7.2 Meter reading to 7-1-1 (E) OEB Workform - 2030 Cost Allocation Model - Tab I5.2 Weighting Factors and Tab I7.2 Meter reading	Attachment 1-Staff-1 (H) 2026 Cost Allocation Model, Tab I5.2 Weighting Factors and Tab I7.2 Meter reading to Attachment 1-Staff-1 (L) 2030 Cost Allocation Model, Tab I5.2 Weighting Factors and Tab I7.2 Meter reading
Schedule 7-1-3 - Standby Service Charge, Section 3.1, Example 3, (p.3, line 19)	7-Staff-196 (b), 7.0-VECC-61	Hydro Ottawa notes Schedule 7-1-3 - Standby Service Charge, Section 3.1 in the original evidence there was an error in Example 3 Generation ON and OFF during a bill period (No Backup Overruns) page 3.	"In this example the Billed Backup Demand would be 550 kW"	The billed backup demand should be 350 kW . The error has been corrected in the bill impact calculations in Table B of interrogatory 7-Staff-196, which details the 2026 proposed structure and rates.
Schedule 7-1-3 - Standby Service Charge	7.0-VECC-61	Hydro Ottawa notes that a statement on page 5 (lines 24-25) of Schedule 7-1-3 - Standby Service Charge, Section 4.2 - Backup Overrun Adjustment, was included in error and should be disregarded.	"minus the lower of Metered Peak generator ON or 500 kW."	Removal of sentence included in error.
Schedule 9-1-3 - Group 2 Accounts, Lines 16-17, p. 42	9-Staff-202 (a) (ii)	Hydro Ottawa notes that a sentence on page 42 (lines 16-17) of Schedule 9-1-3 - Group 2 Accounts, was included in error and should be disregarded.	"Hydro Ottawa is proposing a new deferral account for incremental cloud computing costs, as detailed in Schedule 9-2-1 - New Deferral and Variance Accounts."	Removal of sentence included in error.

Original Evidence Reference	Related Interrogatory Response(s)	Description	As Originally Submitted ¹	As Revised ²
Schedule 9-1-4 - Account 1592 PILS and Tax Variance, Table 1 and April 28 - Attachment 9-1-4(A) - 2020 Accelerated CCA for CCRA.	9-Staff-212 (c), (d), Attachments 9-Staff-212 (A-C).	In the original Table 1 in Schedule 9-1-4 - Account 1592 PILS and Tax Variance and the related CCA calculations, Hydro Ottawa included in error \$910K as an addition in 2020 for the regular CCA calculation. Hydro Ottawa also included in error \$520K as an addition in 2020 for the accelerated CCA calculation.	Table 1 – Impact of Prior “Regular” CCA Rules vs. Accelerated CCA Rules on CCRA for 2020, page 3 and April 28 - Attachment 9-1-4(A) - 2020 Accelerated CCA for CCRA	Table A – UPDATED Impact of Prior “Regular” CCA Rules vs. Accelerated CCA Rules on CCRA for 2020, page 3 and Attachments 9-Staff-212 (A-C).
Attachment 9-1-5(A) - OEB LRAMVA Workform	9-Staff-219 1-Staff-1 Attachment 1-Staff-1 (R) - OEB LRAMVA Workform	Hydro Ottawa has updated the LRAMVA Workform to reflect a duplication error found in persistence at the program level. Please refer to Table AN - Variance Reconciliation Between Attachment 1-Staff-1 (R) - OEB LRAMVA Workform & Attachment 9-1-5(A) OEB LRAMVA Workform for details in 1-Staff-1.	Attachment 9-1-5(A) - OEB LRAMVA Workform	Attachment 1-Staff-1 (R) - OEB LRAMVA Workform Attachment 9-Staff-219(A) - HOL CDM&eDSM