



Ontario  
Energy  
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de l'énergie  
de l'Ontario

**BY EMAIL**

October 31, 2025

Ms. Ritchie Murray  
Acting Registrar  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4  
[Registrar@oeb.ca](mailto:Registrar@oeb.ca)

Dear Mr. Murray:

**Re: Ontario Energy Board (OEB) Staff  
Interrogatories to Hydro One Networks Inc.  
Application for a Service Area Amendment to Schedule 1 Electricity  
Distribution Licence  
OEB File Number: EB-2025-0254**

Please find attached OEB staff interrogatories in the above referenced proceeding, pursuant to Procedural Order No. 2.

Please note that Hydro One Networks Inc. is responsible for ensuring that all documents filed with the OEB, including responses to OEB staff questions and any other supporting documentation, do not include personal information (as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*), unless filed in accordance with rule 9A of the OEB's *Rules of Practice and Procedure*.

Yours truly,

*Natasha Gocool*

Natasha Gocool  
Advisor, Transmission Policy & Compliance

Cc: All Parties in EB-2025-0254

**Hydro One Networks Inc.  
EB-2025-0254**

Please note, Hydro One Networks Inc. (Hydro One) is responsible for ensuring that all documents it files with the OEB, including responses to OEB staff questions and any other supporting documentation, do not include personal information (as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*), unless filed in accordance with rule 9A of the OEB's *Rules of Practice and Procedure*.

**OEB Staff-1**

**Ref 2.: WDI [Service Area Amendment Application](#), August 19, 2025**

WDI states (ref. 2, section 1, p. 3 of 27) that “at that time, the parcel was an active farm supplied by WDI through a load transfer. Since then, the farm operation has ceased, the property has changed ownership, and HONI has removed the permanent electrical service. The lands are now vacant except for a temporary connection serving a sales office.”

1. Please confirm if Hydro One “removed the permanent electrical service” on the subject area.
2. Please provide details about the type of electrical service that was removed, including when it was removed and the reason for its removal.

**OEB Staff-2**

**Ref 1: Hydro One [Supplementary Evidence](#), October 17, 2025**

Hydro One states (ref. 1, section 2.1.1, p. 6 of 18) that “the WDI SAA raises unnecessary potential risk regarding long term planning as well as system safety and reliability responding to local system outages or a major catastrophic failure. Similarly, it inserts pressures to ensure effective network system coordination.”

1. Please explain this statement and the impact that may occur if WDI provided service to the subject area.
2. Have there been any discussions between Hydro One and WDI regarding long-term planning of upstream distribution assets and ways to mitigate any pressures on the network system? If yes, please explain when the discussions have occurred and outcomes of the discussions.
3. Please provide references to any regional planning reports or documents that describe these discussions, such as an Integrated Regional Resource Plan.
4. Please describe Hydro One’s long-term planning for the subject area that accounts for system safety and reliability to meet the load requirements to service the subject area.

5. Please describe Hydro One's plan to minimize system failure on the subject area.

**OEB Staff-3**

**Ref 1: Hydro One [Supplementary Evidence](#), October 17, 2025**

**Ref. 3: [Ontario Energy Board – Distribution System Code, Definitions](#), September 16, 2025**

Hydro One states (ref. 1, section 2.1.1, p. 6 of 18) that this “unnecessary risk and pressure will not materialize provided that Hydro One, in its role as both the existing host distributor and the existing physical and geographic distributor of the Subject Area, continues to serve the Subject Area.”

The DSC definition of a *physical distributor* (ref 3) states that a: “physical distributor”, with respect to a load transfer, means the distributor that provides physical delivery of electricity to a load transfer customer, but is not responsible for connecting and billing the load transfer customer directly.

The DSC definition of a geographic distributor (ref 3) states that a: “geographic distributor,” with respect to a load transfer, means the distributor that is licensed to service a load transfer customer and is responsible for connecting and billing the load transfer customer.

1. As the geographic and physical distributor, if Hydro One is approved to provide service to the subject land, does Hydro One anticipate any new retail points of supply will be created? If yes, please describe what the new retail points of supply will be and the impact on ratepayers.
2. Please explain the statement “...unnecessary risk and pressure will not materialize should Hydro One...continue to serve the subject area.”

**OEB Staff-4**

**Ref 1: Hydro One [Supplementary Evidence](#), October 17, 2025**

**Ref 2.: WDI [Service Area Amendment Application](#), August 19, 2025**

In (ref. 2, section 1, p. 4 of 27), WDI states “HONI has no proximate infrastructure to the Subject Lands and would need to upgrade approximately 4.95 km of existing line and construct an additional 350 m of new line to make the connection. This approach would duplicate facilities already in place, introduce unnecessary cost, and create avoidable community disruption. It would also require WDI to abandon and lose its existing right-of-way along the site's access corridor - incurring real costs and permanently reducing WDI's flexibility for future system planning in the area.”

Hydro One (ref. 1, section 2.1.2, p. 7 of 18) states that “in WDI SAA, Hydro One’s proposed connection has been misrepresented and therefore, Hydro One is correcting the record of this proceeding to reflect the specifics of Hydro One’s actual proposed connection of the Developers at the Subject Area. Hydro One’s proposed connection consists of only upgrading approximately 250 meters of existing line and 350 meters of expansion.”

1. Please identify the actual costs and impacts on ratepayers if Hydro One upgrades approximately 250 meters of existing line and expands 350 meters on the subject area.
2. WDI states (ref 2) Hydro One’s upgrades would result in duplicate facilities serving the subject area. Please address this statement and explain whether Hydro One’s expansion and upgrades on the subject area would result in duplicate facilities.
3. Please identify if (and if so, for whom) the duplicate facilities will have potential cost implications and community disruptions.

**OEB Staff-5**

**Ref 1: Hydro One [Supplementary Evidence](#), October 17, 2025**

Hydro One states (ref. 1, section 2.1.2.4, p. 14 of 18) “in accordance with the “beneficiary pays” principle, the incremental cost of these premium solutions are the cost responsibility of the requestor, typically the municipality or developer, rather than being socialized through distribution rates.”

1. Please confirm if Hydro One has communicated the beneficiary pays principle to both developers: Primont (Wasaga 2) Inc. and Sterling Group of Companies and has informed the developers of the total amount due by the developer, should Hydro One serve the subject area.

**OEB Staff-6**

**Ref 1: Hydro One [Supplementary Evidence](#), October 17, 2025**

Hydro One states (ref. 1, section 3.0, p. 15 of 18) “WDI is also a fully embedded distributor in Hydro One. Any continued expansion of WDI assets into Hydro One service territory, most notably to service the Subject Area, is inefficient.”

1. Please explain this statement and its impact on Hydro One ratepayers in the subject area.

**OEB Staff-7**

**Ref 1: Hydro One [Supplementary Evidence](#), October 17, 2025**

Hydro One states (ref. 1, section 3.0, p. 15 of 18) the “WDI proposed SAA does not optimize the use of existing system configurations and unnecessarily duplicates existing distribution asset.”

1. Please explain this statement and the impact of duplication on existing distribution assets in the subject area.

**OEB Staff-8**

**Ref 1: Hydro One [Supplementary Evidence](#), October 17, 2025**

Hydro One states (ref. 1, section 3.0, p. 15 of 18) that it “has the capability to switch load to a different circuit, in the event of an issue with the 8kV system.”

1. Please identify the feeder and the location of the feeder, that Hydro One can use to switch the load to a different circuit, in the event of an issue with the 8kV system.
2. Does this feeder provide service to other customers in Hydro One’s distribution service territory?
3. Does this feeder have the capacity to provide service to both the subject area and the existing customers without any system reliability issues?

**OEB Staff-9**

**Ref 1: Hydro One [Supplementary Evidence](#), October 17, 2025**

Hydro One confirms (ref. 1, section 3.0, p. 15 of 18) that “capacity is available to accommodate the load of the Subject Area from Sunnidale Corners DS F2 that also has an existing tie point with capacity available from Duntroon DS F2 to accommodate the development.”

1. If Hydro One were to provide service to the subject area, would the existing feeders have sufficient capacity to serve the subject area?
2. Would Hydro One be required to upgrade the feeders to accommodate the load growth after the residential development is completed? If yes, please describe the cost implications for upgrading the feeders and its impact on Hydro One’s ratepayers.
3. Would the existing feeders be used to serve other additional customers in Hydro One’s existing distribution service territory? Please explain how much capacity would be available on the Sunnidale Corners DS F2 and the Duntroon DS F2 to serve additional customers.