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October 31, 2025

Ritchie Murray  
Acting Registrar  
Ontario Energy Board  
27-2300 Yonge Street  
P.O. Box 2319  
Toronto, ON M4P 1E4

**Re: Wasaga Distribution Inc. – EB-2025-0254  
Service Area Amendment Application  
Interrogatories for Hydro One Networks Inc.**

Dear Mr. Murray,

In accordance with Procedural Order No. 2, please find attached Wasaga Distribution Inc.'s (WDI) interrogatories for Hydro One Networks Inc. (HONI) in the above noted proceeding. HONI and all intervenors have been copied on this filing.

Should the Board require additional information, please do not hesitate to contact the undersigned.

Respectfully Submitted,

*A. Karamatic*

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Wasaga Distribution Inc.

**Wasaga Distribution Inc. Interrogatories to Hydro One Networks Inc.  
Wasaga Distribution Inc. Service Area Amendment Application  
EB-2025-0254  
October 31, 2025**

**WDI-01**

[Ref: HONI Evidence, p. 3, Section 2.1, and RP-2003-0044 Decision with Reasons, March 1, 2004, par. 63]

HONI includes that the Board states it must ‘consider the protection of the interests of other consumers in the proposed amendment area... over a time period that includes more than the short-term implications of any given action.’ Please provide HONI’s stance on whether or not this includes future homeowners who will eventually reside in the area and consume electricity? Explain the reasoning behind the answer.

**WDI-02**

[Ref: HONI Evidence, p. 3, Section 2.1]

Provide data or analysis comparing the customer density of the proposed development to adjacent areas currently served by HONI, and would HONI agree that consistency in customer density supports economies of scale and contiguity, as defined by the Board’s principles of economic efficiency, and explain your response?

**WDI-03**

[Ref: HONI Evidence, p. 6, Section 2.1.1]

Describe HONI’s methodology for assessing “risk” when adding load to an embedded distributor’s area. What specific metrics or thresholds are used?

**WDI-04**

[Ref: HONI Evidence, p. 6, Section 2.1.1]

Given that HONI would be drawing load from the same M class feeder that WDI is connected to, can you explain—specifically and technically—how those risks would not materialize under HONI’s service, but would under WDI’s?

**WDI-05**

[Ref: HONI Evidence, p. 6, Section 2.1.1]

Provide the most recent Regional Infrastructure Plan assumptions for Wasaga Beach, including projected load growth, customer additions, and whether these projections incorporate embedded distributor expansion.

**WDI-06**

[Ref: HONI Evidence, p. 6, Section 2.1.1]

Provide HONI’s long-term distribution planning assumptions for the South Georgian Bay–Muskoka region, specifically regarding the expected role of embedded distributors in meeting future load growth.

**WDI-07**

[Ref: HONI Evidence, p. 6, Section 2.1.1]

Provide HONI's average response time for outage restoration for Sunnidale DS related outages over the past three years, compared to its provincial average. Include the source of this data. Please isolate the March 2025 Ice Storm data.

**WDI-08**

[Ref: HONI Evidence, p. 6, Section 2.1.1]

Confirm whether HONI has local crews stationed in Wasaga Beach or if service is dispatched from other locations. Identify the nearest depot and typical travel time to the Subject Area.

**WDI-09**

[Ref: HONI Evidence, p. 5-6, Section 2.1.1]

Does HONI have mutual assistance agreements with embedded distributors? Describe HONI's process for requesting and coordinating mutual assistance with embedded distributors during local outages or major catastrophic failures.

**WDI-10**

[Ref: HONI Evidence, p. 5-6, Section 2.1.1]

Confirm whether HONI considers these mutual assistance arrangements effective in mitigating system safety and reliability risks. Please provide examples or internal evaluations supporting this view.

**WDI-11**

[Ref: HONI Evidence, p. 6, Section 2.1.1]

Provide any studies or internal reports HONI relies on to substantiate claims of system safety and reliability risks for the proposed subdivision.

**WDI-12**

[Ref: HONI Evidence, p. 6, Section 2.1.1]

Has HONI quantified the potential risk associated with adding 2.1 MW of load to Wasaga Distribution Inc.'s embedded area? If quantified, provide the methodology, assumptions, and results. If not, explain why quantification was deemed unnecessary or impractical.

**WDI-13**

[Ref: HONI Evidence, p. 4-5, Section 2.1.1]

Identify all service area amendment applications HONI has opposed in the past five years where the applicant was an embedded distributor. For each, provide HONI's stated reasons for opposition.

**WDI-14**

[Ref: HONI Evidence, p. 12, Section 2.1.2.]

Provide HONI's methodology used to develop its cost estimates for the Subject Area, including all assumptions, inputs, and calculation steps.

**WDI-15**

[Ref: HONI Evidence, p. 12, Section 2.1.2.4]

Provide HONI's copies of any internal guidelines, templates, or standard practices HONI applies when preparing cost estimates for subdivision projects.

**WDI-16**

[Ref: HONI Evidence, p. 10, Section 2.1.2.3]

Provide examples of at least three other connection projects which are not contested where HONI applied this methodology, including supporting documentation that shows the detailed cost breakdown for each project.

**WDI-17**

[Ref: HONI Evidence, p. 6, Section 2.1.2]

Provide HONI's definition of "incremental cost of connection" and explain how it distinguishes between incremental and non-incremental costs.

**WDI-18**

[Ref: HONI Evidence, p. 9, Section 2.1.2.2]

Does HONI agree that the removal of the original connection invalidates the rationale used in the EB-2016-02073 application? Explain the reasoning behind the answer.

**WDI-19**

[Ref: HONI Evidence, p. 15, Section 3.0]

Provide the metrics HONI uses to measure efficiency in distribution planning and service area determinations, and explain how these metrics account for embedded distributors.

**WDI-20**

[Ref: HONI Evidence, p. 15, Section 3.0]

HONI has stated that it can accommodate the load of the subject lands using capacity from Sunnidale Corners DS F2, with an existing tie point to Duntroon DS F2, and that this configuration provides redundancy. Can you clarify how this redundancy would function in practice for the subject lands, given that the proposed connection is via a radial line? Specifically, how long is the radial portion of the tie, and how does HONI ensure fault tolerance and rapid restoration for customers at the end of that radial segment?

**WDI-21**

[Ref: HONI Evidence, p. 15, Section 3.0]

HONI has identified Sunnidale Corners DS F2 and Duntroon DS F2 as sources of capacity for serving the subject lands. Can you confirm whether HONI has real-time operational visibility and remote control capabilities at these stations? Specifically, are these stations equipped with SCADA, and if not, how does HONI monitor and respond to faults or switching requirements in a timely manner?

**WDI-22**

[Ref: HONI Evidence, p. 16, Section 4.0]

Explain HONI's process for coordinating subdivision projects and municipal road works. Provide examples of coordination in Wasaga Beach in the last five years.

**WDI-23**

[Ref: HONI Evidence, p. 16, Section 4.0]

Confirm whether HONI has engaged with the Town of Wasaga Beach regarding this development beyond standard generic circulation notice responses. If so, provide meeting minutes, correspondence, or summaries of discussions.

**WDI-24**

[Ref: HONI Evidence, p. 16, Section 4.0]

Describe HONI's full connection process from initial customer contact to final connection for residential and small business low-voltage customers, and identify the typical timelines for each stage (such as layout package finalization), including any areas where delays commonly occur?

**WDI-25**

[Ref: HONI Evidence]

HONI repeatedly frames its position around "public interest" and "economic efficiency," which are statutory objectives under section 1 of the Ontario Energy Board Act. Provide HONI's interpretation of the OEB's objectives under section 1 of the Ontario Energy Board Act as they relate to embedded distributors. Does HONI consider embedded distribution arrangements to be consistent with those objectives?

**WDI-26**

[Ref: HONI Evidence]

Is HONI suggesting that maintaining its current service territory should take precedence over the interests of electricity consumers who may receive more reliable and cost-effective service from Wasaga Distribution Inc.? Please explain how this position aligns with the Ontario Energy Board's statutory mandate to protect consumers.