

BY EMAIL AND RESS

October 31, 2025

Mr. Ritchie Murray
Acting Registrar
Ontario Energy Board
Suite 2700, 2300 Yonge Street
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Mr. Murray,

EB-2025-0254 – Wasaga Distribution Inc. Application for a Service Area Amendment – Hydro One Interrogatories Submission

In accordance with Procedural Order No. 2, please find enclosed Hydro One Networks Inc.'s ("Hydro One") interrogatories on the Wasaga Distribution Inc. Application for a Service Area Amendment to serve 400 45th Street South in Wasaga Beach, Ontario.

In order to assist the review process specific to the relief sought in this proceeding constructively and efficiently, Hydro One highlights for the Applicant and the OEB that Hydro One has not posed any interrogatory questions related to the section of the Applicant's Supplementary Evidence entitled "Exploration of Supply Lines, Distribution Station Ownership and Connected Customers" beginning on page 8. By the Applicant's own admission, the evidence advanced in this section of the Supplementary Evidence is out of scope of this proceeding, and thus irrelevant to the relief sought in this proceeding. Hydro One's disregard of the out-of-scope evidence is not a form of acceptance and is fundamentally based on OEB jurisprudence that review of an asset divestiture must be based on the assessment of a proposed transaction. A proposed transaction would be between a willing buyer and willing seller. By the Applicant's own admission, the evidence advanced is not a completed transaction nor a definitive proposal. Further discovery into this Supplementary Evidence section would generate unnecessary duplication and procedural inefficiency. Therefore, Hydro One respectfully requests that the OEB omit and not consider that section of the WDI Supplementary Evidence in consideration of the service area amendment relief sought.

A copy of these interrogatories has been submitted using the OEB's Regulatory Electronic Submission System.

Sincerely,



Pasquale Catalano

1 **WASAGA DISTRIBUTION INC.**
2 **Application for Service Area Amendment**

3
4 **Hydro One Networks Inc. Interrogatories**
5 **October 31, 2025**
6

7 **HONI-1:**

8 **References:**

- 9 1. "The developers have expressed a clear preference for WDI to serve the subdivision" – p. 4
10 of 27 of the WDI SAA Application
11
- 12 2. "The developers have indicated a preference for WDI to provide service to the Subject Lands.
13 One developer has formalized this preference in writing, with a letter included in this
14 application, demonstrating alignment with the OEB's principle that customer preference is a
15 relevant factor in service area amendments" – p. 9 of 27 of the WDI SAA Application
16
- 17 3. "The developers have expressed support for the proposed amendment, with written consent
18 provided by one party." – p. 20 of 27 of the WDI SAA Application
19
- 20 4. "The developers have expressed a clear preference for WDI to provide electrical service to
21 the Subject Lands. Written confirmation of support has been provided by one developer and
22 is included as part of this application. Their preference is based on alignment with the Town's
23 approval processes, proximity to WDI's existing facilities, and anticipated efficiencies in
24 servicing the development" – p. 20 of 27 of the WDI SAA Application
25
- 26 5. "The sole current affected customer is the developer of the Subject Lands, who has expressed
27 a preference to be served by WDI. The decision on this application will also impact future
28 residential customers who will purchase and occupy homes within the development." – p. 17
29 of 27 of the WDI SAA Application
30
- 31 6. Sterling Group of Companies Letter dated Jan 30, 2024 - Schedule C, of the WDI SAA
32 Application

1 7. "While the Economic Evaluation (or Discounted Cash Flow Analysis) is generally the most
2 accurate reflection of future ratepayers' interests, its reliability diminishes in the context of
3 relationships between host and embedded distributors. In such cases, reliance on this
4 methodology can result in an inefficient and costlier build out of a distribution system". – p. 6
5 of 11 of WDI Supplementary Evidence

6
7 8. "With respect to 400 45th Street - The OEB must decide: 100% of developer costs, paid for
8 as described by HONI, based on the principles defined in this proceeding is in the best interest
9 of public interest. In fact, utilities should always have paid 100% of this infrastructure
10 (excluding upstream), because at the end of the day – utilities, like WDI need to replace it and
11 some of the challenges we face today are from decisions made in the past, without the
12 appropriate foresight". – p. 6 to 7 of 11 of WDI Supplementary Evidence

13
14 **Interrogatory:**

15 a) Please confirm that the letter dated January 30, 2024, as detailed at Reference 2 and 6, is the
16 most current letter provided by the Developer, the Sterling Group of Companies.

17
18 b) Please confirm the letter noted in question a), above, remains the position of the endorsing
19 Developer and when WDI last confirmed this position with the Developer.

20
21 c) Please clarify when WDI was first made aware of the potential development of the Subject
22 Area. If WDI became aware in writing, provide a copy of the communication.

23
24 d) Please provide any documentation or information sent by WDI to the Developer (in Reference
25 6) prior to January 30, 2024, regarding this connection and the dates those details were
26 shared. If the documentation or information was shared in meetings (prior to January 30,
27 2024), please include the meeting dates.

28
29 e) With respect to the other Developer in Reference 2, Primont, that has now formalized their
30 preference in writing through their registered intervenor request, please provide any
31 documentation or information sent by WDI to this Developer regarding this connection and
32 the dates those details were shared.

- 1 f) Please confirm what cost documentation was provided to the Sterling Group of Companies to
2 secure the letter provided at Reference 6. Please provide what the cost estimate was
3 predicated on.
4
- 5 g) At Reference 7, please confirm what cost responsibility WDI conveyed to each Developer for
6 civil works and whether the developers were shown cost alternatives.
7
- 8 h) With respect to Reference 7, please detail how WDI being an embedded utility has any
9 bearing on conveying to the Developer how much of the connection they will be cost
10 responsible for versus how much of the connection cost will be the responsibility of existing
11 WDI ratepayers?
12
- 13 i) At Reference 8, please identify the specific infrastructure that ‘utilities should always have
14 paid 100% of this infrastructure (excluding upstream)’. Please explain the reason upstream
15 investment is excluded and WDI’s understanding of who is cost responsible for those
16 upstream investments?
17
- 18 j) Please confirm, at Reference 8, whom the term “utilities” is intended to refer to when
19 describing who should bear responsibility for the cost of “this infrastructure”? Specifically, does
20 WDI contend that the cost of “this infrastructure” should be the cost responsibility of the utility,
21 i.e., reducing WDI’s net income, or conversely the cost responsibility of the existing rate
22 payers of the utility, i.e., all other WDI ratepayers?
23
- 24 k) Have the Developers, or any affiliate of the Developers, completed any other underground
25 infrastructure projects in the WDI service territory? If so, have the Developers been cost
26 responsible for civil works for those connections? If not cost responsible for civil works,
27 provide reasoning for not having Developers be cost responsible?
28
- 29 l) Please confirm that the letter at Reference 6 is the only evidence relied on by WDI to support
30 Reference 1 and 4, for WDI to serve the Subject Lands. If not confirmed, what other evidence
31 is being relied upon to evidence the Developers’ “clear preference”.

1 **HONI-2:**

2 **References:**

- 3 1. "The timing of this application is critical. The subdivision is progressing through municipal
4 planning approvals, including detailed servicing design and Composite Utility Plan preparation,
5 where the serving utility must be identified to resolve alignment and space conflicts. A decision
6 now will avoid costly redesigns, ensure civil works are coordinated with permanent electrical
7 servicing, and prevent conflicts between utilities during construction." – p. 4 of 27 of the WDI
8 SAA Application
- 9
- 10 2. "Early certainty as to which utility will serve the Subject Lands is essential to avoiding delays,
11 minimizing redesigns, and ensuring infrastructure investments are efficient and aligned.
12 Addressing the service territory designation now will support coordinated development,
13 protect WDI's existing rights-of-way, and avoid unnecessary duplication of infrastructure" - p.
14 12 of 27 of the WDI SAA Application
- 15
- 16 3. "...the project has not yet reached the Offer to Connect (OTC) stage..." – p. 4 of 27 of the
17 WDI SAA Application
- 18
- 19 4. "Since the detailed design of electrical distribution connections depends on these finalized
20 plans, it is not possible at this time to accurately allocate connection costs. A fully allocated
21 connection cost model requires confirmed development details to determine the extent of
22 required electrical infrastructure, such as transformers, feeders, and underground cabling.
23 Until these details are finalized, any cost estimates would be preliminary and subject to
24 change." – p. 14 of 27 of the WDI SAA Application
- 25
- 26 5. "For the same reasons outlined in Section 3.2, capital contributions cannot be determined at
27 this time. Without finalized development plans, it is not possible to accurately assess the
28 electrical infrastructure requirements or associated capital costs." – p. 14 of 27 of the WDI
29 SAA Application
- 30
- 31 6. Sterling Group of Companies Letter dated Jan 30, 2024 – Schedule C, of the WDI SAA
32 Application

1 **Interrogatory:**

- 2 a) Please provide a copy of the WDI designs for the Subject Lands and all available utility service
3 layouts for the development.
4
- 5 b) Please confirm that WDI has not provided the Developers an Offer to Connect in accordance
6 with the OEB's 'Additional Informational Requirements for Contested Applications' of the Filing
7 Requirements for Service Area Amendment Applications, dated March 12, 2007, section 7.5.2.
8
- 9 c) Please specifically detail what information is unavailable to WDI to provide a preliminary Offer
10 to Connect to the Developers.
11
- 12 d) Based on the information as it is known today by WDI, please provide an example of the Offer
13 to Connect WDI would provide the Developers, and what efforts WDI has made to obtain this
14 information?
15
- 16 e) With respect to Reference 1, please provide any information WDI has received with respect
17 to the forecast timing of municipal and planning approvals for the subdivision.
18
- 19 f) Please reconcile the apparent conflict between the following statements: (i) the necessity of
20 an SAA determination at this stage of municipal planning approvals, including detailed
21 servicing design and Composite Utility Plan preparation, during which the serving utility must
22 be identified to resolve alignment and space conflicts (References 1 & 2); (ii) the fact that,
23 according to References 4 & 5, there is currently insufficient detailed design to define the
24 required electrical infrastructure for accurately allocating connection costs or determining
25 capital contributions; and, (iii) the timing of this application is now characterized as critical
26 against the fact that WDI waited 1.5 years from the signed Developer letter to file its proposed
27 SAA (Reference 1 & 6).
28
- 29 g) Please isolate the a) design costs and b) inspection costs accounted for within WDI's
30 estimates in its Offer to Connect related to the Subject Area of the proposed SAA? Please
31 confirm whether these costs are being allocated directly to the Developers.

1 h) Are there any costs in addition to the costs that will be presented in the Offer to Connect that
2 the Developer would, or has the potential to receive, from WDI if WDI served the Subject
3 Area?
4

5 **HONI-3:**

6 **References:**

- 7 1. "Generally, the applicant should be able to demonstrate that it can provide the lowest cost
8 connection, and that the proposed connection is consistent with existing networks, avoiding
9 duplication" - Board's Decision with Reasons, RP-2003-0044, par. 85
10
- 11 2. "HONI has no proximate infrastructure to the Subject Lands and would need to upgrade
12 approximately 4.95 km of existing line and construct an additional 350 m of new line to make
13 the connection. This approach would duplicate facilities already in place, introduce
14 unnecessary cost, and create avoidable community disruption" – p. 4 of 27 of WDI SAA
15 Application
16
- 17 3. "In the WDI SAA, Hydro One's proposed connection has been misrepresented and therefore,
18 Hydro One is correcting the record of this proceeding to reflect the specifics of Hydro One's
19 actual proposed connection of the Developers at the Subject Area. Hydro One's proposed
20 connection consists of only upgrading approximately 250 meters of existing line and 350
21 meters of expansion. This is confirmed in Hydro One's Multi-Service Connection Cost
22 Agreement, included in Attachment 5, which contains two service connection options for
23 consideration by the Developers." – p. 6 of 18 of HONI Intervenor Evidence
24
- 25 4. "The WDI proposed SAA does not optimize the use of existing system configurations and
26 unnecessarily duplicates existing distribution assets. Hydro One has upstream capacity
27 available to facilitate the new development. In addition, Hydro One has the capability to switch
28 load to a different circuit, in the event of an issue with the 8kV system. Hydro One confirms
29 capacity is available to accommodate the load of the Subject Area from Sunnidale Corners
30 DS F2 that also has an existing tie point with capacity available from Duntroon DS F2 to
31 accommodate the development." – p. 15 of 18 of HONI Intervenor Evidence

1 **Interrogatory:**

- 2 a) Identify any Hydro One asset whose purpose or function would duplicate WDI assets if the
3 SAA was not approved. In addressing this question, please consider Hydro One's actual
4 design and connection proposal as detailed at Reference 3 and 4 and not the details
5 represented by WDI at Reference 2, which are incorrect.
6
- 7 b) Considering Reference 3 and 4, please confirm whether WDI can still substantiate that Hydro
8 One servicing the Subject Area will still duplicate facilities already in place. If yes, please
9 provide a detailed explanation why WDI continues to take this position.
10

11 **HONI-4:**

12 **Reference:**

- 13 1. "This system, designed and built to accommodate future load growth in the area, has sufficient
14 capacity to serve the projected 2.1 MW load without upstream investment, ensuring that the
15 connection can be made with minimal incremental cost and maximum use of existing assets"
16 – p. 4 of 27 of WDI SAA Application
17
- 18 2. "Any concerns that HONI may have regarding the proposed 2.1 MW has the potential to pale
19 in comparison to the potential impacts of additional 65 MW of load". – p. 8 of 11 of WDI
20 Supplementary Evidence
21
- 22 3. "The Subject Lands are directly adjacent to recently upgraded WDI infrastructure along
23 Morgan Road, extending from Club Court to Middleton Drive (see Figure 2), part of a purpose-
24 built section of WDI's network designed to accommodate growth within the Town of Wasaga
25 Beach. This infrastructure was specifically planned and constructed to support residential
26 development and provide redundancy in this area and is currently serving surrounding
27 subdivisions." p. 13 of 27 of WDI SAA Application Evidence.

1 4. "HONI has provided evidence to question WDI's use of the words "purpose built" and seems
2 to suggest that WDI has done so, specifically for this development. Again, WDI always
3 understood 400 45th Street to fall within its licensed service territory. That interpretation was
4 ultimately correct or not, WDI's actions were based on its genuine and reasonable
5 understanding of its service area and licence obligations. WDI would therefore strongly object
6 to any suggestion or interpretation that it has purpose-built assets in this area specifically for
7 this development, or any other misrepresentation HONI might try and convey." – p. 3 of 11 of
8 WDI Supplementary Evidence.

9
10 **Interrogatory**

- 11 a) At Reference 1 and 2, please provide all studies, reports, data, and calculations with dates
12 and assumptions (e.g. load profiles) that WDI relied on to conclude that its existing
13 infrastructure can accommodate the projected 2.1 MW load without any upstream investments
14
- 15 b) At Reference 1, define the term "this system" as used in the Reference, and identify each
16 component involved (e.g. substation, transformer, feeder lines).
- 17 i. For each component, provide its design capacity (e.g. MW), current peak load or utilization,
18 and available spare capacity.
- 19 ii. If any of these components identified in (i.) were upgraded or reinforced (collectively,
20 Upgrades) since 2020 to support future growth, provide the details and dates of those
21 Upgrades.
- 22 iii. Please provide all alternatives considered for any of the Upgrades.
- 23
- 24 c) At Reference 1, please confirm the majority of the load growth in this area targeted by "this
25 system" would materialize within Hydro One service territory.
- 26
- 27 d) At Reference 2, provide examples of past connections of similar size to 2MW in WDI's service
28 area, including the capacity of the host feeder at the time, any system upgrades required, and
29 the final costs of those projects. Please also detail the cost borne by developers or customers
30 for each project.

- 1 e) At Reference 4, WDI provides supplementary evidence that suggests that Hydro One has
2 misinterpreted WDI's prefiled evidence with respect to how facilities have been purpose built
3 to accommodate future growth as detailed at Reference 1 and 3. Please clarify how Hydro
4 One has misrepresented the prefiled evidence provided by WDI on the upstream facilities
5 being purpose built to address future load growth. In so doing, please clarify what is meant by
6 WDI by the following statements in each respective reference:
- 7 i. Reference 1: "This system, designed and built to accommodate future load growth in the
8 area..."
- 9 ii. Reference 3: "The Subject Lands are directly adjacent to recently upgraded WDI
10 infrastructure along Morgan Road, extending from Club Court to Middleton Drive (see
11 Figure 2), part of a purpose-built section of WDI's network designed to accommodate
12 growth within the Town of Wasaga Beach. This infrastructure was specifically planned
13 and constructed to support residential development and provide redundancy in this area
14 and is currently serving surrounding subdivisions."

15
16 **HONI-5:**

17 **References:**

- 18 1. "WDI presented a total project estimate of \$3.69 million, which included \$1.52 million in civil
19 works such as trenching, duct banks, vaults, and road crossings. In contrast, HONI's estimate
20 of approximately \$2.4 million excluded key components such as civil works and inspection
21 service." – p. 22 of 27 of WDI SAA Application
- 22
- 23 2. "The OEB Bulletin, dated September 29, 2022, states,
24 The OEB believes that, where such a premium solution is desired, the incremental cost of the
25 investment should be funded through other means, rather than through distribution rates (e.g.,
26 by the municipal shareholder through municipal property taxes similar to the approach
27 recently used in Ottawa). This approach is consistent with the optimal infrastructure solution
28 principle discussed above, as the 'premium' solution would not be the 'optimal' solution
29 identified in the regional infrastructure plan." – p. 13 of 18 of HONI Intervenor Evidence
- 30
- 31 3. Table 1 One-Time Connection Costs – p. 7 of 18 of HONI Intervenor Evidence

1 **Interrogatory:**

- 2 a) Please provide WDI's costs in the table format provided in Reference 3, Table 1 'One-Time
3 Connection Costs'.
- 4
- 5 b) Please confirm that a premium solution in Reference 2 would refer to an underground supply
6 solution versus an overhead lines solution.
- 7
- 8 c) Please provide WDI's definition for a premium solution, if different from question b, above and
9 the rationale for that.
- 10
- 11 d) Please confirm whether civil works such as trenching, duct banks, vaults or road crossings
12 are shared or have the potential to be shared by other utilities (i.e. telecom, gas, water etc.)?
- 13
- 14 e) Does WDI intend to recover any portion of the civil works costs associated with providing an
15 underground (premium) connection solution from its existing distribution ratepayers? If so,
16 please identify the specific cost components, the basis for inclusion, and any anticipated
17 treatment within WDI's next Cost of Service application. If WDI does not intend to recover
18 these civil works costs from ratepayers, please describe the mechanism and methodology
19 used to identify, track, and segregate such costs to ensure they are not included in rate base
20 or recovered through rates in its next Cost of Service application. In your response, explain
21 how WDI ensures transparency and auditability of this cost treatment, and whether any
22 affiliate, developer, or third party is contributing to or reimbursing these costs.
- 23

24 **HONI-6:**

25 **References:**

- 26 1. 2023 Reliability Metrics Comparison – p. 15 of 27 of the WDI SAA Application
- 27
- 28 2. "Unlike WDI's looped and recently upgraded system, HONI's design introduces a single point
29 of failure, reduces overall reliability, and entails a higher-cost, less efficient build that
30 duplicates existing infrastructure without adding value." – p. 16 of 27 of the WDI SAA
31 Application
- 32
- 33 3. "WDI consistently outperforms HONI in reliability metrics (SAIFI and SAIDI), offering fewer

1 and shorter outages and a more resilient system with built-in redundancy” – p. 9 of 27 of WDI
2 SAA Application

3
4 4. “Importantly, WDI operates well below the OEB’s established reliability targets, demonstrating
5 a highly reliable system, whereas HONI exceeds its targets, indicating comparatively lower
6 reliability. These performance benchmarks underscore that WDI’s network is inherently more
7 reliable.” – p. 15 of 27 of WDI SAA Application

8
9 5. “WDI is a fully embedded distributor of Hydro One and is surrounded by Hydro One service
10 area.” – p. 4 of 18 of HONI Intervenor Evidence

11
12 **Interrogatory:**

13 a) Please explain the SAIDI and SAIFI results year over year from 2018 to 2023 with
14 explanations for the annual variances in performance, following the LTLT SAA Decision.

15
16 b) Given References 2 through 4, please detail the rationale for upgrading the infrastructure
17 along Morgan Road to create a loop feed for existing connections for further redundancy
18 purposes.

19
20 c) With respect to Reference 2, please provide the SAIDI and SAIFI data for the affected feeders
21 in the area for the five years prior to the in-servicing of WDI’s looped and recently upgraded
22 system. Please provide the same reliability data post-in-servicing this upgraded infrastructure.

23
24 d) Please provide the number of unplanned outages in this area in the five years prior to the
25 recently upgraded infrastructure detailed at Reference 2. Please detail the cause and duration
26 of each unplanned outage.

27
28 e) Please confirm if the loop redundancy for the new subdivision connection is included in the
29 cost estimate or is there additional cost required to complete the loop?

30
31 f) Please detail the depth of consultation undertaken by WDI with Hydro One in advance of filing
32 the WDI Distribution System Plan (EB-2023-0055) as an embedded distributor of Hydro One
33 and neighboring distributor, as noted at Reference 5.

1 **HONI-7:**

2 **Reference:**

- 3 1. "The Subject Lands are directly adjacent to recently upgraded WDI infrastructure along
4 Morgan Road, extending from Club Court to Middleton Drive (see Figure 2), part of a purpose-
5 built section of WDI's network designed to accommodate growth within the Town of Wasaga
6 Beach. This infrastructure was specifically planned and constructed to support residential
7 development and provide redundancy in this area and is currently serving surrounding
8 subdivisions." – p. 13 of 27 of WDI SAA Application
9
- 10 2. "The WDI annual capital plans have been included as Attachments 2, 3 and 4 of this intervenor
11 evidence, respectively. Therein, WDI articulates plans to undertake the following:
12 1) MS#6 Sunnidale Road Substation – 2022 Capital Budget Report, Attachment 3,
13 p. 32.
14 2) Morgan Road (new stn backup) Overhead – 2022 Capital Budget Report,
15 Attachment 3, p. 33.
16 3) Morgan Road –2023 Capital Budget Report, Attachment 4, p. 29.
17 Cumulatively, these investments equate to a minimum of a new substation and the expansion
18 of over 3km of primary conductor at a forecast capital cost exceeding \$4 million." – p. 11 of
19 18 of HONI Intervenor Evidence
20
- 21 3. [EB-2023-0055 - Appendix K of 2-VECC- 3 – WDI approved budget plans for the 2021 through](#)
22 [2023 capital expenditures – Filed February 2, 2024](#) – HONI Intervenor Evidence Attachments
23 2, 3, 4
24
- 25 4. "WDI has approximately 470 meters of existing pole line along Morgan Road; however, this
26 infrastructure was not originally built to serve the subject development and will require
27 upgrading to accommodate permanent service. Granting the amendment will enable WDI to
28 utilize and upgrade this existing infrastructure efficiently." – p. 18 of 27 of WDI SAA Application

- 1 5. “The proposed infrastructure will enable cost-efficient expansion within the Subject Lands.
2 WDI already maintains upgraded infrastructure along Morgan Road, supported by existing
3 capacity on Feeder 1 from Municipal Station #6, with Feeder 4 from Municipal Station #3
4 available as a backup. The projected 2.1 MW load of the proposed subdivision can be
5 accommodated with minimal upstream investment.” – p. 16 of 27 of WDI SAA Application
6
- 7 6. [EB-2023-0055 -Exhibit 2, Table 16 Municipal Station Summary — WDI Distribution System](#)
8 [Plan – Filed October 20, 2023](#)
9
- 10 7. “As part of the connection, WDI will upgrade a short section - approximately five poles - along
11 the remaining segment of the Morgan Road corridor. This work will complete the
12 reinforcement of the corridor, enhance local reliability, and ensure that the infrastructure is
13 ready for additional connections should future development occur. By proactively upgrading
14 this strategic section, WDI maximizes the value of existing assets and minimizes the need for
15 reactive or piecemeal infrastructure upgrades. The result is a more resilient and future-ready
16 network that benefits both the Subject Lands and the broader area, all while controlling long-
17 term costs and avoiding unnecessary duplication of ratepayer-funded infrastructure” – p. 16
18 of 27 of WDI SAA Application
19
- 20 8. EB-2006-0327, Filing Requirements for SAA Applications, March 12, 2007.
21
- 22 9. “Ultimately, this project will have the benefits of redundancy, increased load distribution
23 capabilities, and greater load capabilities” – 2023 Capital Budget Report, Attachment 4, p.29
24

25 **Interrogatory:**

- 26 a) Please confirm that the recently upgraded WDI infrastructure along Morgan Road, extending
27 from Club Court to Middleton Drive detailed at Reference 1, 2, 3, are those planned in the
28 2023 Capital Budget, detailed at Slide 29, with a forecast capital cost of \$547,631.
- 29 i. If so, please fully describe what was intended by WDI with respect to “greater load
30 capabilities” in the sentence in Reference 9, and
31 ii. Please identify from WDI’s DSP the need for the upgrade undertaken to the infrastructure
32 along Morgan Road

- 1 b) Please clarify whether WDI ratepayers or the Developer will be the beneficiaries that pay for
2 the work detailed at Reference 4.
3
- 4 c) With respect to References 3, 5, 6, and 7, please confirm that it is WDI's position that any
5 costs associated with the previously incurred upstream investments that have been placed in
6 service in the last three years to address anticipated forecast growth in the area should not
7 be included in the comparison of costs between utilities? If so, please provide WDI's rationale
8 for this position.
9
- 10 d) At Reference 7, please detail why WDI believes the Morgan Road upgrade is a "strategic
11 section".
12
- 13 e) At Reference 7, WDI highlights that approving the SAA would avoid unnecessary duplication
14 of ratepayer funded investments that have been recently completed. Please provide both the
15 total cost of the following investments as well as the proportionate share of those costs that
16 existing WDI ratepayers have funded for the below:
- 17 i. WDI's Municipal Station 6
 - 18 ii. The work identified as Morgan Road in the 2023 Capital Plan including replacing the three-
19 phase riser pole on Sunnidale Rd. S., installing ducts and conductors through the golf
20 course to Club Court where the existing sectionalizing cabinet will be replaced with a new
21 pad mounted switchgear unit as well as new conductors installed in existing ducts between
22 the new switchgear unit and the existing pole line at Wedgewood Drive to complete the
23 circuit.
 - 24 iii. The work identified as Morgan Road (new stn backup) – Overhead in the 2022 Capital
25 Plan that included a 3 phase 8 kV pole line along Morgan Road between Middleton
26 Boulevard and Club Court.
27
- 28 f) If any of the assets in-service identified in Reference 2 were not purely funded by existing
29 WDI ratepayers and contributions in aid of construction (CIAC) were made, please provide
30 the amounts and timing of the capital contributions provided.

1 **HONI-8:**

2 **Preamble:**

3 On October 23, 2025, WDI sought the OEB's approval to submit additional evidence resulting in
4 the issuance of Procedural Order 2. As part of this request, WDI submitted additional evidence
5 on October 21, 2025, including its Load Growth Analysis Report dated October 11, 2023, filed in
6 its Cost of Service application (EB-2023-0055), Exhibit 2, Appendix D.

7
8 In WDI's supplementary evidence, WDI states:

9 "WDI submits the following evidence and requests that any publicly available information
10 from the OEB's website be considered relevant to this proceeding". – p. 1 of 11 of WDI
11 Supplementary Evidence

12
13 **Reference:**

14 1. "The WDI annual capital plans have been included as Attachments 2, 3 and 4 of this intervenor
15 evidence, respectively. Therein, WDI articulates plans to undertake the following:

- 16 1) MS#6 Sunnidale Road Substation – 2022 Capital Budget Report, Attachment 3, p. 32.
17 2) Morgan Road (new stn backup) Overhead – 2022 Capital Budget Report, Attachment
18 3, p. 33.
19 3) Morgan Road –2023 Capital Budget Report, Attachment 4, p. 29.

20 Cumulatively, these investments equate to a minimum of a new substation and the expansion
21 of over 3km of primary conductor at a forecast capital cost exceeding \$4 million." – p. 11 of
22 18 of HONI Intervenor Evidence

23
24 2. [EB-2023-0055 - Appendix K of 2-VECC- 3 – WDI approved budget plans for the 2021 through](#)
25 [2023 capital expenditures – Filed February 2, 2024](#) – HONI Intervenor Evidence Attachments
26 2, 3, 4

27
28 3. EB-2006-0327, Filing Requirements for SAA Applications, March 12, 2007.

29
30 4. "Ultimately, this project will have the benefits of redundancy, increased load distribution
31 capabilities, and greater load capabilities" – 2023 Capital Budget Report, Attachment 4, p. 29.

- 1 5. "In EB-2023-0055 (WDI Cost of Service), WDI submitted independent evidence of anticipated
2 load growth within its service area of potentially seeing up to 103.6 MW by 2033. Any concerns
3 that HONI may have regarding the proposed 2.1 MW has the potential to pale in comparison
4 to the potential impacts of additional 65 MW of load." – p. 8 of 11 of WDI Supplementary
5 Evidence
6
- 7 6. EB-2023-0055, WDI Cost of Service Application, October 20, 2023, Exhibit 2 Rate Base and
8 Capital, Appendix 2 (C) 2024-2028 Wasaga Distribution Inc. Distribution System Plan,
9 Appendix D: Load Growth Analysis Report – p. 2 of 11 of WDI Supplementary Evidence
10
- 11 7. EB-2023-0055, WDI Interrogatory Responses, dated February 2, 2024, 2-Staff-25, Load
12 Growth Analysis Report.
13

14 **Interrogatory:**

- 15 a) Please provide a table of WDI's annual customer count by rate class for the last 5 years.
16
- 17 b) At Reference 1, 2 and 4, please detail how many incremental customers relative to 2020 have
18 been connected annually for: 1) Morgan Road – 2023 and 2) Morgan Road – new stn backup
19 and capture the information by adding two additional columns to the table created in response
20 to question a), above.
- 21 1) Morgan Road: The work identified as Morgan Road in the 2023 Capital Plan included
22 replacing the three-phase riser pole on Sunnidale Rd. S., installing ducts and
23 conductors through the golf course to Club Court where the existing sectionalizing
24 cabinet will be replaced with a new pad mounted switchgear unit. New conductors will
25 be installed in existing ducts between the new switchgear unit and the existing pole line
26 at Wedgewood Drive to complete the circuit.
- 27 2) Morgan Road (new stn backup) Overhead: The work identified as Morgan Road (new
28 stn backup) Overhead in the 2022 Capital Plan that included a 3 phase 8 kV pole line
29 along Morgan Road between Middleton Boulevard and Club Court.

- 1 c) Pursuant to s.7.1.6 of Reference 3, please provide a description of WDI's plans, known to
2 date, for similar expansions in lands adjacent to the Subject Area. Provide a map or diagram
3 showing the lands where expansions are planned in relation to the Subject Area with the
4 timing contemplated for these expansions.
5
- 6 d) At Reference 1, please detail for each investment 1) MS#6 Sunnidale Road Substation; 2)
7 Morgan Road (new stn backup) Overhead; and 3) Morgan Road, if they are defined as
8 planned growth or potential load growth within the Load Growth Analysis Report based on
9 WDI's definition outlined in Reference 7, 2-Staff-25, a).
10
- 11 e) Provide the corresponding references for the investments identified in Reference 1 to WDI's
12 Load Growth Analysis Report at Reference 6.
13
- 14 f) Please provide the source for the 65 MW of load cited in Reference 5 and the location of this
15 load for future development.
16
- 17 g) Reference 7 details that planned growth in Reference 6 is derived from projects in the Town
18 that are either in the final stages of planning approvals or currently under construction.
19 Assumptions for the potential growth rely on preliminary submissions from the Town Pre-
20 Consultation process and strategic growth areas outlined by the municipality's planning.
21 These two sources of growth loads have been utilized to forecast the capacity needs of WDI.
22 Given this detail, please confirm whether:
- 23 i. Reference 6 contemplated the development of the Subject Area.
24 ii. Any of the other preliminary submissions from the Town pre-consultation process and
25 strategic growth areas outlined by the municipality's planning are currently in HONI's
26 service territory.

1 **HONI-9:**

2 **References:**

- 3 1. “The Subject Lands are directly adjacent to recently upgraded WDI infrastructure along
4 Morgan Road, extending from Club Court to Middleton Drive (see Figure 2), part of a purpose-
5 built section of WDI’s network designed to accommodate growth within the Town of Wasaga
6 Beach. This infrastructure was specifically planned and constructed to support residential
7 development and provide redundancy in this area and is currently serving surrounding
8 subdivisions.” – p. 13 of 27 of WDI SAA Application
9
- 10 2. “HONI has provided evidence to question WDI’s use of the words “purpose built” and seems
11 to suggest that WDI has done so, specifically for this development.
12 Again, WDI always understood 400 45th Street to fall within its licensed service territory. That
13 interpretation was ultimately correct or not, WDI’s actions were based on its genuine and
14 reasonable understanding of its service area and licence obligations. WDI would therefore
15 strongly object to any suggestion or interpretation that it has purpose-built assets in this area
16 specifically for this development, or any other misrepresentation HONI might try and convey.”
17 – p. 3 of 11 of WDI Supplementary Evidence
18
- 19 3. “Cumulatively, these investments equate to a minimum of a new substation and the expansion
20 of over 3km of primary conductor at a forecast capital cost exceeding \$4 million. These
21 investments (and any others Hydro One has not been able to identify thus far) have been
22 purpose-built by WDI to expand the WDI distribution system to supply the Subject Area and
23 other future developments. This is confirmed by WDI’s proposed SAA¹ and in the description
24 of the investments in the Capital Budget Reports.² Even if these investments were completed
25 at the forecast costs provided, none of these expansion costs have been considered in the
26 cost comparison advanced by WDI in this SAA. These costs, irrespective of whether they are
27 directly or indirectly attributable to the connection of the Subject Area, should be considered
28 in the capital cost comparison as outlined by the OEB’s Combined Distribution SAA
29 Proceeding Decision.” – p. 11 of 18 of HONI Intervenor Evidence

¹ WDI SAA Application, August 19, 2025, page 13.

² For example, Morgan Road, 2023 Capital Budget Report within Attachment 4, states, “Ultimately, this project will have the benefits of redundancy, increased load distribution capabilities, **and greater load capabilities**” (emphasis added).

- 1 4. “WDI operates as an Embedded Distributor and HONI takes every opportunity to favour its
2 own commercial interests over those of WDI, despite the fact that WDI is HONI’s customer as
3 an Embedded Distributor”. – p. 1 of 11 of WDI Supplementary Evidence
4
- 5 5. “While HONI, on the other hand, may claim that it is acting the in best interest of its roughly
6 one million customers, the reality is that the customers directly impacted on these developed
7 lands, and WDI itself - an embedded distributor and a customer - has effectively been
8 sidelined”. – p. 3 of 11 of WDI Supplementary Evidence
9
- 10 6. Chapter 7 of the OEB’s Filing Requirements for Transmission and Distribution Applications –
11 Issued March 12, 2007
12
- 13 7. “The timing of this application is critical. The subdivision is progressing through municipal
14 planning approvals, including detailed servicing design and Composite Utility Plan preparation,
15 where the serving utility must be identified to resolve alignment and space conflicts. A decision
16 now will avoid costly redesigns, ensure civil works are coordinated with permanent electrical
17 servicing, and prevent conflicts between utilities during construction” – p. 4 of 27 of WDI SAA
18 Application
19

20 **Interrogatory:**

- 21 a) At Reference 1, state whether WDI describes the Morgan Road infrastructure, extending from
22 Club Court to Middleton Drive, as ‘purpose-built’. If yes, please provide WDI’s definition of
23 “purpose-built” as used in this context.
24
- 25 b) At Reference 1 and 2, define the beneficiary by geographical location for the ‘recent upgraded
26 WDI infrastructure’.
27
- 28 c) Provide the evidence that underpinned WDI’s investment decision for this ‘purpose-built
29 section of WDI’s network’ identified in Reference 1.
30
- 31 d) Identify how the investment need was assessed and what WDI considered in its determination
32 to have its ratepayers fund the ‘purpose-built’ section of WDI’s network, designed to
33 accommodate growth’ pertaining to Hydro One’s service territory.

- 1 e) Please identify any investments, not yet identified by Reference 3, that are ‘purpose-built by
2 WDI to expand WDI distribution system to supply the Subject Area’ and/or future
3 developments that are currently within HONI’s service territory. For each investment, please
4 provide the reference in WDI’s Capital Budget Reports (EB-2023-0055) with the capital costs
5 and detail whether those costs are forecast or actual.
6
- 7 f) Please provide how WDI’s actions in Reference 1 and 2 aligns with the beneficiary-pays
8 principle.
9
- 10 g) How does WDI recommend that the OEB and parties to this proceeding assess the cost
11 burden imposed on the developers and existing WDI ratepayers, respectively, absent an offer
12 to connect? Please clarify why WDI believes that section 7.5 of the OEB’s minimum filing
13 requirements for contested service area amendments does not apply in this proceeding,
14 including the mandatory requirement for information and documentation to be filed flowing
15 from the Offer to Connect (OTC)?
16
- 17 h) In response to the question above, if WDI relies on its position in Reference 7, please explain
18 how this connection is materially different than any other connection across the province that
19 has preceded it and have complied with the OEB’s service area amendment mandatory filing
20 requirements?
21
- 22 i) Please provide a table of the variance between WDI versus Hydro One’s Customer
23 Satisfaction Survey Scorecard results annually from 2019 to 2024.

1 **HONI-10:**

2 **References:**

3 “The proposed development consists of a 660-unit residential subdivision, including 329 single-
4 detached dwellings, 139 townhouses, and 192 back-to-back townhouses.” – p. 10 of 27 of WDI
5 SAA Application

6
7 **Interrogatory:**

8 a) Please quantify the forecast number of new residential customers associated with the Subject
9 Area and express this as a percentage of WDI’s current residential customer base in its 2024
10 OEB Scorecard results.

11
12 **HONI-11:**

13 **Reference:**

14 “Denial of the amendment would strand WDI’s existing infrastructure along Morgan Road and
15 undermine long-standing occupation rights within the utility corridor, contrary to the OEB’s
16 principle of efficient use of resources” – p. 8 of 27 of WDI SAA Application.

17
18 **Interrogatory:**

19 a) Identify all assets WDI considers “existing infrastructure along Morgan Road” and identify
20 whose service territory they reside within.

21
22 b) For each asset, provide: asset type, voltage, precise location (GPS or civic), function
23 (distribution metering, switching), in-service date, original installed cost, accumulated
24 depreciation, and current net book value (NBV).

25
26 c) Confirm whether each asset is currently energized and serving load and identify the current
27 numbers of customers served by each asset.

28
29 d) Describe all mitigation options available if the SAA is denied (e.g., reconfiguration,
30 redeployment) and the expected utilization of each affected asset under those options. Identify
31 any incremental costs or savings from mitigation versus declaring assets stranded.

- 1 e) Please provide more information regarding WDI's "long-standing occupation rights" in this
2 utility corridor. Specifically, please provide:
- 3 i. The type of legal rights granted to WDI or relied upon by WDI, for occupation of the utility
4 corridor.
 - 5 ii. Copies of all real estate rights identified in e), i) above, including any easement rights.
 - 6 iii. A map with sufficient detail outlining the utility corridor and its boundaries.
 - 7 iv. Details on how determination to deny the SAA, will undermine the specific rights
8 described in section i), above.
 - 9 v. The gross book value and net book value of the referenced real estate rights.
- 10

11 **HONI-12:**

12 **References:**

- 13 1. "The Applicants state that no assets will be stranded if the application is approved." – Joint
14 LTLT Decision (EB-2016-0207), p. 2
- 15
- 16 2. "Denial of the amendment would strand WDI's existing infrastructure along Morgan Road..."
17 – p. 8 of 27 of WDI SAA Application
- 18

19 **Interrogatory:**

- 20 a) Please reconcile WDI's statements between the Joint LTLT Application (Reference 1) and
21 WDI's current position that denial of the proposed SAA would strand infrastructure along
22 Morgan Road (Reference 2).
- 23
- 24 b) Provide a chronology of all Morgan Road infrastructure additions, relocations, or upgrades
25 from January 1, 2015 to present (asset name, approval date of investment need decision,
26 asset in-service date, book value cost, and stated need) to provide the details for Reference
27 2.
- 28
- 29 c) Identify which of these assets WDI now characterizes as: i) at risk of stranding, and ii) whether
30 those asset investments were undertaken with knowledge that the Subject Area lands are
31 within Hydro One's License (ED-2003-0043).

1 **HONI-13:**

2 **Reference:**

3 “In considering whether assets are stranded, the Board will have regard to the extent to which an
4 asset thought to be stranded is genuinely referable and connected or connectable to the project
5 site, and part of the necessary infrastructure to serve that specific location. Where upstream
6 customers have made significant contributions in aid of construction with a reasonable
7 expectation that future connections will provide contributions in turn as they become connected,
8 the Board may consider some portion of the original contribution to be stranded” – Board’s
9 Decision with Reasons, RP-2003-0044, par. 292

10
11 **Interrogatory:**

- 12 a) Explain, asset-by-asset, how each is “genuinely referable and connected or connectable to
13 the project site,” and forms part of the necessary infrastructure to serve that specific location.
14
- 15 b) Identify any assets on Morgan Road that are not referable and connected or connectable to
16 the Subject Area and explain why WDI considers they will be stranded assets.
17
- 18 c) Provide WDI’s methodology for attributing stranded value to each asset in accordance with
19 Reference 1.
20

21 **HONI-14:**

22 **References:**

- 23 1. “Faster service connection timelines: Because WDI already has upgraded facilities and
24 distribution assets in place near the Subject Lands, it can complete the connection using
25 standard construction methods within a significantly shorter timeline than would be required
26 for HONI to design, permit, and upgrade a 4.95 km pole line upgrade and construct 350 m
27 pole line expansion. This supports timely project development and reduces delays related to
28 utility servicing.” – p. 17 of 27 of WDI SAA Application
29
- 30 2. “The Town of Wasaga Beach, as the local municipality, also supports WDI as the logical and
31 efficient service provider.” – p. 4 of 27 of WDI SAA Application

- 1 3. "One advantage is that WDI will allow us to complete the design, and HONI will complete it
2 in-house, so with WDI, the design process and utility coordination aspect will be streamlined.
3 " – Primont Intervention Request, October 9, 2025
4
- 5 4. "The Town of Wasaga Beach - WDI's shareholder - would be the only confirmed permanent
6 connection to be serviced on these developed lands and the developer's interests on the
7 matter has been disregarded by HONI. Their approach cannot reasonably be said to be
8 serving the public interest." – p. 3 of 11 of WDI Supplementary Evidence
9
- 10 5. "HONI is a publicly traded entity; WDI Holds no ownership stake in HONI. WDI's preference
11 has always been to work collaboratively with HONI toward solutions that would serve the best
12 interests of all stakeholders. Unfortunately, despite those efforts on behalf of WDI, this
13 proceeding has become necessary." – p. 2 of 11 of WDI Supplementary Evidence
14

15 **Interrogatory:**

- 16 a) For Reference 1 and 3, provide WDI's detailed schedule for completing the connection and
17 identifying all assumptions (e.g., municipal approvals, design, and construction).
18
- 19 b) Provide any internal or external benchmarking studies WDI relied upon to support its claim of
20 'faster service connection timelines' in Reference 1.
21
- 22 c) Provide documentation to substantiate Reference 2 and 4, specifically that the Town of
23 Wasaga Beach supports WDI as the service provider for the Subject Area.
24
- 25 d) With respect to Reference 2, is WDI relying on any OEB Decisions or filing requirements to
26 support how municipal preference should be considered in an SAA.
27
- 28 e) With respect to Reference 4, is WDI relying on any OEB Decisions or filing requirements to
29 support how shareholder preference should be considered in an SAA.
30
- 31 f) With respect to Reference 4 and 5, please reconcile how shareholder ownership is a relevant
32 consideration based on OEB Decisions or filing requirements that should be considered in
33 this SAA.

- 1 g) With respect to Reference 4, has the Town of Wasaga Beach requested connection in the
2 Subject Area from WDI? If not, please clarify how WDI asserts the Town of Wasaga Beach
3 would be the only confirmed permanent connection to be serviced on these developed lands.
4

5 **HONI-15:**

6 **References:**

- 7 1. "Some parties argued that aligning the service areas with municipal boundaries advances
8 distribution system planning. The Board does not regard such alignment to be inherently
9 beneficial. It is apparent that the decoupling of the electrical utilities from municipal
10 government, which is one of the signal reforms in the recent development of the electricity
11 market, will continue to evolve. It is not unlikely that the pursuit of efficiencies will lead to the
12 continuing consolidation of the distribution industry in Ontario, and any alignment of service
13 areas to specific municipalities will be increasingly irrelevant. - Board's Decision with Reasons,
14 RP-2003-0044, par. 241
15
- 16 2. "In accordance with WDI's licence, these lands fall within the Town of Wasaga Beach
17 boundaries and therefore should properly be determined to be within WDI's licensed service
18 territory." – p. 3 of 11 of WDI Supplementary Evidence
19
- 20 3. "Again, WDI always understood 400 45th Street to fall within its licensed service territory. That
21 interpretation was ultimately correct or not, WDI's actions were based on its genuine and
22 reasonable understanding of its service area and licence obligations. WDI would therefore
23 strongly object to any suggestion or interpretation that it has purpose-built assets in this area
24 specifically for this development, or any other misrepresentation HONI might try and convey."
25 – p. 3 of 11 of WDI Supplementary Evidence
26
- 27 4. ED-2002-0544, Schedule 1, Section 4, more specifically the following language: "4. With the
28 exclusion of the customers located at the following premise addresses within the Township of
29 Wasaga Beach: 1800 Sideroad 12/13 North Sunnidale, Stayner, ON, L0M 1S0; 1815
30 Sideroad 12/13 North Sunnidale, Stayner, ON, L0M 1S0; 1925 Sideroad 12/13 North
31 Sunnidale, Stayner, ON, L0M 1S0; and 400 45th St S, Stayner, ON, L0M 1S0."

1 5. "One advantage is that WDI will allow us to complete the design, and HONI will complete it
2 in-house, so with WDI, the design process and utility coordination aspect will be streamlined.
3 " – Primont Intervention Request, October 9, 2025
4

5 **Interrogatory:**

6 a) At Reference 1, the Board determined alignment of service areas with municipal boundaries
7 is not inherently beneficial for distribution system planning and may become increasingly
8 irrelevant as consolidation and efficiency objectives advance. Please confirm whether WDI
9 accepts this guidance, and if not, provide the basis for its disagreement.
10

11 b) At Reference 2, WDI has stated that the lands at '400 45th Street fall within its licensed service
12 territory because it is within the Town of Wasaga Beach, and at Reference 3, WDI states again
13 that it has always understood this property to be part of its service area. Please reconcile the
14 WDI statements at Reference 2 and 3 with the current effective OEB-approved WDI
15 distribution licence, noted at Reference 4, that explicitly outlines that 400 45th Street is not
16 within the service territory of WDI.
17

18 c) Please confirm whether WDI acknowledges that its reliance on municipal boundaries and its
19 own interpretation of its License is not aligned with the Board's guidance in Reference 1 and
20 that customer interests are best served through efficiency and consolidation rather than
21 municipal alignment. In your response, please explain how WDI's position from Reference 2
22 and 3 aligns with the OEB's statutory objectives.
23

24 d) At Reference 5, please provide any documentation shared by WDI with Primont exchanged
25 prior to the submission of Primont's evidence.

1 **HONI-16:**

2 **References:**

- 3 1. "WDI has been very clear - and has communicated this directly to HONI on multiple occasions
4 - that it has always understood 400 45th Street would revert back to WDI's licensed service
5 territory if it was ever developed." – p. 3 of 11 of WDI Supplementary Evidence
6
- 7 2. "WDI remains committed to full transparency and, while mistakes can occur, WDI acts with
8 honesty and with integrity in all its operations." – p. 3 of 11 of WDI Supplementary Evidence
9

10 **Interrogatory:**

- 11 a) At Reference 2, with respect to the above statement is the "mistake" that WDI always
12 understood 400 45th Street would revert back to WDI's licensed service territory if it was ever
13 developed? If not, provide details of what is meant by "while mistakes can occur".
14

15 **HONI-17:**

16 **References:**

- 17 1. "This development is anticipated to be phased. Should the first phase be on the south-east
18 corner, WDI's existing assets are in place and multiple options are available to ensure that it
19 works with the developer for a cost effective - purpose built and designed system – something
20 HONI simply cannot do." – p. 4 of 11 of WDI Supplementary Evidence
21
- 22 2. "I believe WDI has an advantage because they can switch the load for the entire area to a
23 different circuit." - Primont's Intervenor Evidence as submitted on p. 5 to 6 of 11 of WDI
24 Supplementary Evidence
25
- 26 3. "The WDI proposed SAA does not optimize the use of existing system configurations and
27 unnecessarily duplicates existing distribution assets. Hydro One has upstream capacity
28 available to facilitate the new development. In addition, Hydro One has the capability to switch
29 load to a different circuit, in the event of an issue with the 8kV system. Hydro One confirms
30 capacity is available to accommodate the load of the Subject Area from Sunnidale Corners
31 DS F2 that also has an existing tie point with capacity available from Duntroon DS F2 to
32 accommodate the development." – p.15 of 18 HONI Intervenor Evidence

1 **Interrogatory:**

2 a) At Reference 1, please confirm whether WDI believes phasing the Subject Area is necessary
3 for the purpose of electric servicing and installation of distribution system assets. If WDI does
4 confirm, provide all documents, communications, and other information WDI relied on or
5 received that support the following:

6 i. The assertion that the first phase will be on the south-east corner, and the earliest date
7 WDI first learned of that proposal.

8 ii. The reasons WDI believes electrical servicing cannot be completed in a single phase.
9

10 b) At Reference 2, please confirm Primont's Intervenor Evidence was submitted to the OEB on
11 October 8th, prior receiving the benefit of HONI's Intervenor Evidence that was filed on October
12 17th, at Reference 3.
13

14 c) At Reference 2, please confirm Primont's submission is premised on the understanding that
15 HONI cannot switch the load from the subject area to another circuit, which premise is
16 incorrect, as per Reference 3.