



Hydro One Networks Inc.

483 Bay Street
7th Floor South Tower
Toronto, Ontario M5G 2P5
HydroOne.com

Kathleen Burke

VP, Regulatory Affairs
T 416-770-0592
Kathleen.Burke@HydroOne.com

BY EMAIL AND RESS

October 31, 2025

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

Dear Mr. Murray,

EB-2025-0030 – Hydro One Networks Inc. – Application for 2026 Distribution Revenue Requirement – Interrogatory Responses

In accordance with the Ontario Energy Board’s (OEB) Procedural Order No.1 issued October 8, 2025, please find interrogatory responses provided by Hydro One Networks Inc.

Interrogatory responses have been assigned Exhibit I and have been addressed in the following order:

Exhibit	Tab	Intervenor
I	1	OEB Staff
I	2	Consumers Council of Canada
I	3	Ontario Federation of Agriculture
I	4	School Energy Coalition
I	5	Vulnerable Energy Consumers Coalition

Please note that interrogatories were not received from the Ontario Federation of Agriculture.

Pursuant to the OEB’s Rules of Practice and Procedure and the Practice Direction on Confidential Filings dated December 17, 2021 (the Practice Direction), Hydro One will be filing a confidential request for information contained in Interrogatories I-01-11 (OEB Staff IR #11), I-02-08 (CCC IR #8), I-05-13 (VECC #13), and related attachments, under separate cover.

An electronic copy of the Interrogatory Responses has been submitted using the OEB’s Regulatory Electronic Submission System.

Sincerely,

Kathleen Burke

1 **OEB STAFF INTERROGATORY - 01**

2
3 **Reference:**

4 Exhibit A-6-1, Page 16 of 36

5
6 **Preamble:**

7 Hydro One states asset removal costs typically cover labour and equipment for
8 dismantling or demolition, transportation and disposal of materials.

9
10 **Interrogatory:**

- 11 a) Please provide a detailed breakdown detail of Asset Removal Costs by rate zones,
12 categorized into labour, labour (overtime), trucks, materials, etc.
- 13
- 14 b) Please confirm whether Asset Removal Costs include any internal labour costs.
- 15
- 16 c) Please clarify whether Hydro One paid any premium amounts to its third-party
17 contractors.

18
19 **Response:**

- 20 a) and b) Asset Removal Costs are the costs to retire and remove utility assets from
21 service, either at the end of their useful life or when replacements are required due to
22 service upgrade or damage (such as in response to a weather event). These costs
23 include labour, equipment, and other expenditures associated with dismantling,
24 disconnecting and disposing of the asset, as well as site restoration where applicable.

25
26 Hydro One calculates asset removal costs as a fixed percentage of the asset costs,
27 based on the asset type and the type of work completed, and does not have a further
28 categorization of these costs. The fixed percentage approach is used in lieu of tracking
29 specific asset removal costs for each individual asset, which would be administratively
30 burdensome and inefficient given the number and dispersion of assets in the
31 distribution system. The fixed-percentage method to determine asset removal costs
32 is also used within Hydro One's planning assumptions to ensure removal costs are
33 applied consistently across capital assets. Hydro One's treatment of Asset Removal
34 Costs is consistent with USGAAP accounting and reporting standards.

35
36 The Z-factor related Asset Removal Costs included are provided by Rate Zone in
37 Exhibit A-06-01, Table 13.

Filed: 2025-10-31

EB-2025-0030

Exhibit I

Tab 1

Schedule 1

Page 2 of 2

- 1 c) Hydro One confirms that the third-party contractor costs included in the Z-Factor claim
- 2 amount were based on prices as outlined in agreements with third-party contractors,
- 3 and that no discretionary premiums were paid to the contractors.

OEB STAFF INTERROGATORY - 02

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Reference:

Exhibit A-6-1, Page 21 of 36, Table 10

Preamble:

Hydro One indicates that the major storm resulted in total costs of approximately \$223.0M, including \$196.2M Net Capital Expenditures.

Interrogatory:

a) In the reference above, Hydro One provided the total capital expenditures by asset classes. Please provide details of \$196.2M by filling out the table below, for each rate zone.

Asset/Equipment	Quantity	Repaired or Replaced	Estimated Net Asset Value	Useful Life
Poles, Towers & Equipment				
Overhead Conductors and Devices				
Line Transformers				
Total				

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b) Please discuss in detail whether the total capital amount of \$196.2M includes costs in addition to asset repairment/replacement.

c) Please confirm whether any assets were already scheduled for replacement or repair before the storm. If yes, please indicate the amount.

Response:

a)

Table 1 - Hydro One Distribution Rate Zone

Asset/Equipment	Quantity	Repaired or Replaced	Estimated Net Asset Value	Useful Life / Depreciation Rate
Poles, Towers & Equipment ¹	6,159 units	Replaced	\$87.0M	58.5 Years / 1.71%
Overhead Conductors and Devices ²	401,358 meters	Replaced	\$54.9M	62.9 Years / 1.59%
Line Transformers	758 units	Replaced	\$45.1M	44.2 years / 2.26%
Total			\$187.0M	

Table 2 - Hydro One Peterborough Rate Zone

Asset/Equipment	Quantity	Repaired or Replaced	Estimated Net Asset Value	Depreciation Rate
Poles, Towers & Equipment ¹	419 units	Replaced	\$4.3M	58.5 Years / 1.71%
Overhead Conductors and Devices ²	28,199 meters	Replaced	\$3.1M	62.9 Years / 1.59%
Line Transformers	1 unit	Replaced	\$0.02M	44.2 years / 2.26%
Total			\$7.4M	

Table 3 - Hydro One Orillia Rate Zone

Asset/Equipment	Quantity	Repaired or Replaced	Estimated Net Asset Value	Depreciation Rate
Poles, Towers & Equipment ¹	37 units	Replaced	\$1.0M	58.5 Years / 1.71%
Overhead Conductors and Devices	1,448 meters	Replaced	\$0.8M	62.9 Years / 1.59%
Line Transformers ²	0 units	N/A	\$0.0M	44.2 years / 2.26%
Total			\$1.8M	

b) The total capital amount of \$196.2M is directly attributable to the asset replacement and storm restoration effort for the Z-Factor event, and does not include costs in addition to asset replacement/restoration.

¹ This category includes both poles and crossarms. Crossarms are not tracked at the Operation Center level and have been allocated to the Peterborough and Orillia Rate Zones based on the crossarm to pole ratio for the respective operations centers. 239 crossarms are allocated to the Peterborough Rate Zone and 19 crossarms are allocated to the Orillia Rate Zone.

² Meters of overhead conductors are not tracked at the Operation Center level and have been allocated to the Peterborough and Orillia Rate Zones based on the crossarm to pole ratio for the respective operations centers. 1,448 and 28,199 meters of overhead conductors are allocated to Orillia and Peterborough Rate Zones respectively.

1 c) In Hydro One’s Custom IR rate application (EB-2021-0110), Hydro One proposed a
2 pole replacement program that would address a subset of poor condition poles. The
3 subset focused on poles that impacted the highest number of customers. Based on
4 that plan, of the 3,088 poles replaced during the Z-factor event, 27 poles were planned
5 for refurbishment and 88 were planned for replacement over the 2023 to 2027 rate
6 period. Two of them were scheduled for refurbishment or replacement in 2025 but had
7 not yet been addressed at the time of the Z-factor event.

8
9 Similarly, of the 3,527 crossarms replaced during the Z-factor event, 18 were planned
10 for replacement over the 2023 to 2027 period but had not yet been scheduled, and
11 two transformers with PCB content were planned to be replaced prior to the end of
12 2025 but had not yet been scheduled.

13
14 **Table 1 - Assets Replaced During the Z-Factor Event Previously Planned for**
15 **Replacement by Rate Zone**

	Hydro One Distribution	Peterborough	Orillia	Total
Poles	112	2	1	115
Cross Arms	18			18
Transformers	2			2

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OEB STAFF INTERROGATORY - 03

Reference:

Exhibit A-6-1, Page 1 of 36

Interrogatory:

- a) Please submit engineering reports such as damage assessments related to the Z-factor event.
- b) Please confirm whether Hydro One claimed insurance for any portion of the restoration costs.
- c) Please confirm all cost categories have been audited. If not, please indicate which costs have not been audited, and when they are targeted to be audited. (Author:
- d) Please confirm if there are changes expected to Hydro One's future investment plans as a result of replacing damaged assets caused by the Z-factor event. If yes, please explain the changes. If no, please explain why not.
- e) Please confirm that Hydro One has removed the damaged assets from its book.

Response:

- a) During a major storm event, and in particular those under a declared state of emergency such as this Z-Factor event, Hydro One's first priority is to restore power safely and as quickly as possible. Operational activities are focused on assessing damage, prioritizing restoration efforts, and coordinating crew and materials to return customers to service.

Damage assessment was conducted throughout the response using the approach specified in the Damage Assessment Procedure – see Attachment 1.

Given the magnitude of this unprecedented storm, hundreds of damage assessment forms were completed by field staff and contractors. These forms, when possible to complete them, were used operationally to direct and prioritize restoration activities in real time. Collecting, organizing, and producing all these forms would be impractical and overly burdensome within the timelines for responding to interrogatories.

In addition, it is important to note that real-time response needs and infrastructure availability constraints impacting cellular and internet connectivity at the height of the storm, in many cases limited the ability of field staff to transmit information

1 electronically or upload data onto centralized systems. Where these operational
2 challenges were encountered, information on damage assessments was relayed
3 verbally through radio, or informally through text or handwritten notes to facilitate timely
4 responses.

5
6 b) Hydro One did not make any insurance claims for any portion of the restoration costs
7 sought for recovery. Consistent with standard industry practice, transmission and
8 distribution assets (towers, poles, and wires) located outside transmission and
9 distribution stations are not covered by insurance.

10
11 c) All the costs sought for recovery in this application have been thoroughly validated by
12 internal staff as part of the efforts in preparing the application.

13
14 Hydro One has a comprehensive and transparent system to track and report storm-
15 related costs, ensuring that only eligible restoration expenses are captured while
16 excluding costs that would have incurred under normal operation conditions.

17
18 Hydro One creates a dedicated set of storm work orders for each emergency event,
19 such as the Z-Factor Event, organized by regional Operation Centres and acquired
20 Local Distribution Companies. These work orders serve as the foundation for
21 categorizing all storm-related expenses, including labour, fleet, materials, contractors,
22 and third-party services. Costs associated with Joint Use Partners are also tracked
23 and invoiced separately to prevent any burden on ratepayers. Routine maintenance
24 and unrelated capital work are managed through separate work orders to maintain
25 cost integrity. A multi-layered review process ensures accuracy, compliance, and
26 alignment with regulatory standards. This structured approach reinforces Hydro One's
27 commitment to financial accountability and provides assurance that storm restoration
28 costs are accurate, prudent and supported by appropriate documentation.

29
30 After the close of the 2025 fiscal year, Hydro One's 2025 financial statements and
31 regulatory account balances will be audited in the normal course as part of the
32 company's standard year-end financial review process.

33
34 d) Hydro One is managing its capital and OM&A expenditures for the 2023-2027 period
35 to the overall funding envelope approved in EB-2021-0110. As noted in Exhibit A-06-
36 01 Pages 18-19 of the Z-factor claim, Hydro One has experienced higher than planned
37 expenditures driven by demand related work and input cost pressures over the current
38 rate period. As a result, Hydro One has already begun reprioritizing elements of its
39 capital work program and expects to continue over the remainder of the rate term in
40 order to manage the overall capital portfolio within the approved funding envelope.
41 Further reprioritization to absorb the capital impacts of the Z-Factor event within

1 existing rate-funded capital envelopes would increase risks to system performance,
2 reliability, and customer outcomes.

3

4 If Hydro One were required to absorb the nearly \$200M in incremental storm
5 restoration costs within its existing approved capital funding envelope, the company
6 would be forced to evaluate deferring urgent and necessary capital work. Such
7 deferrals would risk impairing system performance and delay investments needed to
8 serve growth and public commitments across the province. For these reasons, Hydro
9 One has sought incremental funding for the Z-Factor expenditures rather than
10 reprioritizing or reducing other critical work at this time.

11

12 e) Confirmed.

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[HODS](#)

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Purpose and Scope

This section shall include:

- **Purpose:** To outline roles and responsibilities of a Damage Assessor to safely perform Damage Assessment duties during storm restoration efforts
- **Scope:** This document applies to all staff assigned to Damage Assessment responsibilities, regardless of Line of Business.

Safety Absolutes – Select all which apply									
<input checked="" type="checkbox"/> Designated Work Area 	<input type="checkbox"/> Working at Heights 	<input type="checkbox"/> Cranes & Hoists 	<input type="checkbox"/> Energy Isolation 	<input type="checkbox"/> Grounding & Bonding 	<input checked="" type="checkbox"/> Personal Protective Equipment 	<input type="checkbox"/> Equipment Safeguards & Protective Measures 	<input checked="" type="checkbox"/> Mobile Equipment & Light Vehicles 		
High Energy Hazards – Select all which could apply									
<input checked="" type="checkbox"/> Gravity 	<input checked="" type="checkbox"/> Electrical 	<input type="checkbox"/> Mechanical 	<input checked="" type="checkbox"/> Motion 	<input type="checkbox"/> Pressure 	<input checked="" type="checkbox"/> Temperature 	<input type="checkbox"/> Chemical 	<input type="checkbox"/> Sound 	<input type="checkbox"/> Biological 	<input type="checkbox"/> Radiation 

Revision History

Version	Brief Description of Revisions
R2	Updated Section 2.3: Working Alone
R1	Updated Section 3: Qualifications
R0	This is a new document

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9.0 Definitions / Acronyms

1.0 Introduction

This document outlines the necessary documents, training, tools and equipment required to safely and effectively damage assess and perform designated roles in storm applications. Design Services is the accountable Line of Business for Damage Assessment.

Employees (SDT, ADET, MTech, MRDC, SFT, AFT) are called in/transferred to a LACC (Local Area Command Centre) via their Supervisor/Manager and report to the Local Damage Assessment Coordinator (DAC). Damage Assessors (DA) are identified by their local Supervisor/Manager as “DA qualified” or trainee. If staff are not deemed qualified, they must be paired with a qualified DA to complete damage assessment patrols, or assigned other duties.

2.0 Safety

As with all work, Hydro One Safety Rules and approved work practices must be followed. Staff must have reviewed and understand the following:

2.1 Job Planning

Job plans are required for all Damage assessment activities in accordance with [SP2251](#).

Following the storm event the Damage Assessor is to submit all Job Plans to their home supervisor to be reviewed and stored, regardless of the location of storm.

Job plans should be revisited and updated frequently during storm due to changing conditions, special attention should be given to changing weather, road conditions and dusk/dawn activities.

2.2 Public Safety Hazards

When hazardous conditions are found in the field on either private or public property that could pose a serious risk to other staff or members of the public, the Damage Assessor is to call in to notify the Damage Assessment Coordinator in the LACC immediately and remain on-site to guard against injury until the condition has been made safe by competent personnel.

The [Public Safety Link](#) provides information that can be supplied to customers to prepare for storm and actions to take during a storm event.

2.3 Working Alone

Damage Assessment can be completed as individuals or pairs, so long as qualifications are met (see section 3.0 below). Where situations warrant DA's will be paired.

Safety Rule 214 to item 2 in the [Hydro One Safety Rule Book 2024](#) applies when working alone on Storm.

 [SP2443 Working Alone](#) must be followed during Storm, specifically  [Appendix DxL \(Design Services\) - Design Services Working ALone Plan](#).

Contact is to be made every 4 hours, and last check-in is to be documented on the Electronic Whiteboard by the DA Coordinator or delegate.

2.4 Fit for Duty Procedure

All employees are expected to adhere to the Fit for Duty policy as outlined in [SP0886](#) during all times at work.

2.5 Personal Protective Equipment

When fulfilling any role in storm, employees are expected to utilize all PPE in accordance with [PPE – SP1148](#).

2.6 Safe Limits of approach

Until UWPC is established all lines are to be considered live and a safe distance in accordance with the [Limits of Approach](#) must be maintained at all times.

2.7 Weather Conditions

Damage Assessment is necessitated by past or current extreme weather events. Guidelines for extreme weather conditions below should be considered, understood and communicated.

2.7.1 Hot and Cold Weather Planning

Staff travelling to assist with storm should plan ahead as outlined in [SP1536 – Hot and Cold Weather planning](#). Storms assignments can last for multiple days of work in adverse weather conditions.

2.7.2 Extreme weather conditions

The Damage Assessment Coordinator, in communication with the Tech FLM/COM, must monitor weather conditions as outlined in [SP1954](#) and may pause Damage Assessment due to weather conditions

2.8 Wildlife and Vegetation

Hazardous Vegetation and Wildlife as outlined in [Outdoor Natural Hazards – SP1731](#) can vary across different geographic regions and seasons.

Damage Assessors should be aware of the area where they are working and use appropriate PPE/preventative measures.

3.0 Qualifications

3.1 L1 Trainee Damage Assessor

Damage Assessors must meet a minimum criteria to assist in storm restoration outside of their home operation centre. Section 1 of the [Damage Assessment Qualifications Checklist](#) must be completed and signed off by their local Supervisor/Manager.

Once employees meet the criteria of Section 1, a training record should be submitted and the course code “STRMTA” will be added to their training profile in HOLMS.

3.2 Qualified Damage Assessor

Damage Assessors are deemed “Qualified DA’s” once items of Section 2 in the [Damage Assessment Qualifications Checklist](#) are met **and** their Supervisor/Manager has signed-off.

Exceptions will occur where employees have past experience, these employees can be signed off at the discretion on the local Manager on Section 3 of the Damage Assessment Qualifications Checklist.

Once employees meet the criteria of Section 2 or 3 a training record will be submitted and the course code “STRMDA” will be added to their training profile in HOLMS.

3.3 Qualifications in the Crew Transfer Application

When completing a crew Transfer in [Power Apps \(Crew Transfer and Activate and Surrender\)](#) for Damage Assessors, indicate qualifications (L1 – Trainee or L2 – DA Qualified)

The screenshot shows a web application interface for crew transfer. At the top, there are navigation buttons: 'Set Res Availability', 'Transfer/Assign to Op Ctr' (highlighted), 'Add Resource', 'Edit / View Resource', 'Edit / View Assignment', 'Assign to Work Crews', and 'Log Orientation'. Below this is the 'Assign / Transfer to:' section with dropdown menus for Region, Op Center, Role (set to 'DA'), and Transfer / Release. To the right are fields for Transfer Crew Lead, Qualifications (with a dropdown menu showing 'L1 - Trainee' and 'L2 - DA Qualified'), Tablet, and Accommodation Request. Further right are time-based fields for Expected Arrival, Expected Available to work, and Actual Release from Assignment, each with a calendar icon. On the far right, there are fields for Transferred By (Name, Position, Office Phone, Cell Phone, Assigned Date) and Report to (Name, Position, Phone, Cell, Address). A 'Clear' button is at the bottom right.

4.0 Orientation

All staff transferred to an area to assist with Damage Assessment will receive a LACC orientation package containing information specific to the local Operation Center. The LACC orientation will be sent electronically by the receiving operations center.

4.1 Orientation package contents

- Introduction
- LACC Contacts
- Hospitals
- Extras (Area specific information and orientation)
- Fueling locations

- Hotels
- Restaurants
- Staging Areas
- Boat launches
- Maps and local voltage

5.0 Duties

5.1 Damage Assessment

Damage Assessors may be assigned individual incidents or feeder patrols by the Damage Assessment coordinator. Damage Assessors are required to be familiar with the [Damage Assessment Training Fall 2022](#) and submit a damage assessment form for each individual damage location in the method described in the most current version of the [Damage Assessment Work Instruction](#).

5.2 Flagging

At the request of Lines, DA staff may be requested to assist as Traffic Control Personnel (flagging) as part of [Requirements for Traffic Control Plans SP0143](#).

VETRC2 is an instructor-lead, mandatory training requirement before performing any duties related to traffic control.

5.3 Locates

5.3.1 Hydro One Locates

Hydro One does not complete underground locates for external requestors, with the exception of Zone 7 and Moosonee in Zone 6 who follow [WI - Cable Locates in Zone 7 and Moosonee](#). For internal crews requiring locates, the crew completes their own Hydro One locates.

5.3.2 Site Meets with LSP

In order to obtain emergency locates, Local Service Providers (LSP's) require a Hydro One representative be on-site. DA staff may be requested by lines to attend site meetings with the LSP to verify dig site location(s) and obtain the locates from the LSP.

5.4 Material Delivery

Damage Assessors may be requested to deliver material to Field Crews, transportation of materials is to be in compliance with vehicle loading capacities and securement.

DA staff are not equipped to transport environmentally sensitive materials such as transformer spill contents and materials.

5.5 “Bird-Dog” Assistance

The role of the Bird-Dog is to lead outside crews and assist with local geographical area knowledge, mapping clarification and minimal damage assessment ahead of the line crew.

Only those who are “DA Qualified” resources will be assigned the role of Bird Dog.

The DA will not assist with trouble sheet completion, repairs or work protection.

6.0 Off Road work and Equipment

All workers operate an off-road vehicle must comply with the [Hydro One Safety Rule Book 2024](#) Rules 500-506.

Travel on waterways, ice/snow trails or air will be determined by the local DA coordinator with preference given to local staff with familiarity of their surroundings, equipment, PPE and training in accordance with [Hydro One Safety Rule Book 2024](#) Rule 215

6.1 Off Road travel

Staff are to arrange a check-in plan with the DA Coordinator. The plan may be specific to location, communication method and frequency. Staff operating Off-road units must comply with [HO4173 Personnel Carrier](#) which outlines specific training courses for the operation of Off-road vehicles

6.2 Water & Ice Travel

Boat travel requires specific training needs and equipment that are not assigned to all staff.

The DA Coordinator and DA are to ensure training requirements for Water/Ice Travel are met prior to the assignment of work per [Waterways Safety SP0693](#) and [PR0046 Working and Travelling on Ice](#)

6.3 Helicopter Travel

Damage Assessment in specific locations is sometimes completed by helicopter. Lines may request the DA Coordinator for a resource to Damage Assess right of ways from the air, in such cases the DA coordinator will usually select a DA with local knowledge and experience. In order to be a passenger in a helicopter, HEHPB1 – Helicopter Pre-Flight Briefing must be completed to understand the safety procedures relating to helicopter travel.

7.0 Vehicles and Tools

A suitable vehicle is required for Damage Assessment duties which may include a radio, specific lighting and computer stand. When travelling to other operations centres, be mindful of terrain, road conditions and ground clearance, notify the DA Coordinator of your vehicle limitations.

DA Coordinator will assign duties in alignment with available TWE. Staff are required to seek manager approval for additional items listed below.

7.1 Tablet or Laptop Stands

Tablet Stands and passengers:

The only vehicles with tablet stands which don't allow a front-seat passenger are those where the tablet stand post is mounted in the passenger footwell area. This design is generally limited to Escapes, Transit Connects, Chrysler/RAM minivans.

Console-style tablet stands (typical installation for 2017+ pickups) and post-style stands mounted between the seats (typical installation for International/Freightliners, Transits, and some pre-2017 pickups) allow for front-seat passengers.

Photo examples

<p>Front-seat passenger NOT allowed (tablet post mounted in passenger footwell area) 2020 Ford Escape Shown</p>	<p>Front-seat passenger allowed (tablet post mounted between front seats) 2020 Ford Transit shown</p>
	

7.2 Two-Way Radio Communication

When working in areas that lack cellular coverage, a 2-way radio may provide a better option. A discussion with your Manager is required for approval. Instructions to obtain are provided below.

2way (CB style) radio install

Contact 'HydroOne Telecom with the following information:

- TWE vehicle number (6 digit)
- Primary contact person (with user ID and phone number) and their availability
- Site code, name and address
- Alternate contact person (with phone number)

7.3 Vehicle Spot Lighting

All vehicle lighting must be approved by fleet, an alternative option for vehicles without the permanent Go-Light can be acquired with Manager approval.

Portable Milwaukee magnetic go light: MM# 20009571



8.0 Tools

8.1 Distribution Maps

Distribution Maps are available through the use of the Field Maps Application on Cell Phones.

All staff have access to a view-only version and can access by following the instruction: [Arc GIS Field Maps Mobile App Details](#) (Design staff can use their design version of Field Maps)

Online maps can be used when in areas with cell reception, offline maps should be downloaded for the local area before departing from the operations centre.

8.2 Personal Tools and Equipment

While preparing for Damage assessment, ensure the following are considered:

- PPE (High visibility)
- Snowshoes/Rubber boots
- Phone / Computer and chargers
- Flashlight
- Hammer and Stakes
- Flagging Tape
- Pylons
- Door Hangers [Storm Electrical Service Notice](#)
- Seasonal PPE/FR
- Tick kit

9.0 Definitions / Acronyms

Acronym /Term	Meaning as it applies in this Document
ADET	Area Distribution Engineering Technician
SDT	Supervising Distribution Technician
MTech	Metering Technician
MRDC	Meter Reader Data Collector
AFT	Area Forestry Technician
SFT	Supervising Forerestry Technician
LACC	Local Area Command Center
FLM	Front Line Manager
DA	Damage Assessment / Damage Assessor
PPE	Personal Protective Equipment
ETR	Estimated Time of Restoration
WI	Work Instruction

Acronym /Term	Meaning as it applies in this Document
LSP	Locate Service Provider
TWE	Transport and Work Equipment
APP	Application
STRMTA	Trainee Damage Assessor code in HOLMS
STRMDA	Qualified Damage Assessor code in HOLMS
Bird Dog	Resource that leads outside crews and assist with local geographical area knowledge and minimal damage assessment

OEB STAFF INTERROGATORY - 04

Reference:

Exhibit A-6-1, Page 16 of 36

Preamble:

Hydro One states that it is not seeking recovery of the OM&A costs incurred due to the Z-factor event in the interest of regulatory efficiency.

Interrogatory:

- a) Please provide the amount of total OM&A costs related to the Z-factor event, by rate zone, including breakdown details such as number of eligible employees and hours worked.
- b) Please provide the amount in base rates related to reactive OM&A.

Response:

- a) While OM&A funded staff across functions such as operations coordination, field supervision, materials management, customer communications, and administrative support played a critical role in the overall restoration efforts, their regular compensation is included within base rates, and no material incremental expensed labour or overtime costs were separately tracked or recorded. Accordingly, the costs sought for recovery in this application are limited to the capital and removal costs that are directly attributable to the replacement and restoration of the damaged distribution assets following the storm.
- b) Hydro One Distribution sets its revenue requirement based on a Custom IR framework whereby the total OM&A is approved by the OEB in year one and escalated formulaically in future years of the rate period. Hydro One manages total OM&A relative to the overall approved amount in rates however there is no "approved" Reactive OM&A amount in rates.

Filed: 2025-10-31
EB-2025-0030
Exhibit I
Tab 1
Schedule 4
Page 2 of 2

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OEB STAFF INTERROGATORY - 05

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Reference:

Exhibit A-6-1, Page 10 of 36

Preamble:

Mutual assistance was formally initiated with support from Ontario Mutual Assistance Group (OnMAG) and Canadian Mutual Assistance Group (CanMAG) partners..

Interrogatory:

- a) Please specify which utility partners from OnMAG and CanMAG has participated in the restoration.
- b) Please provide Hydro One's annual OM&A Emergency Maintenance amounts included in rates, budgeted and actual expenditures for the years 2023 to 2028.

Response:

- a) Table 1 provides a list of Mutual Aid Partners that participated in the storm response efforts

1
2

Table 1 - Mutual Aid Partners

Mutual Aid Partner	Mutual Assistance Group
Alectra	OnMAG
Bluewater Power	CanMAG/OnMAG
Elexicon	CanMAG
Enova Power	OnMAG
Entegrus Powerline	CanMAG/OnMAG
Enwin Utilities	OnMAG
EPCOR	CanMAG/OnMAG
ERTH	OnMAG
Essex Powerlines	CanMAG/OnMAG
Fortis Ontario (Algoma Power)	OnMAG
Fortis Ontario (Canadian Niagara Power)	OnMAG
GrandBridge Energy Inc.	CanMAG/OnMAG
Greater Sudbury Hydro	OnMAG
Hydro Ottawa	CanMAG/OnMAG
London Hydro	CanMAG/OnMAG
Milton Hydro	OnMAG
NB Power	CanMAG/NaMAG
Orangeville Hydro	OnMAG
Quebec Hydro	CanMAG/NaMAG
Sault Ste Marie PUC	OnMAG
Toronto Hydro	CanMAG/OnMAG
Utilities Kingston	CanMAG/OnMAG

1 Hydro One also received support from the following utilities:
 2

Utility
Centre Wellington Hydro
Lakefront Utilities
Niagara Peninsula Energy
Oshawa Hydro
Ottawa River Power
Renfrew Hydro
Wasaga Distribution Inc.
Wellington North Power
Westario Power

3 b) Hydro One Distribution sets its revenue requirement based on a Custom IR framework
 4 whereby the total OM&A is approved by the OEB in year one and escalated
 5 formulaically in future years of the rate period. Hydro One manages total OM&A
 6 relative to the overall approved amount in rates however there is no “approved”
 7 emergency maintenance amounts amount in rates.
 8

9 Emergency maintenance work is carried out in the Trouble Call Program. Hydro One’s
 10 Trouble Call Program expenditures for the current rate period are provided below. Plan
 11 expenditures for 2028 are beyond the current rate period.
 12

13 **Table 1 – Hydro One Trouble Call Program (\$M)**

	2023		2024		2025		2026	2027
	Plan*	Actual	Plan*	Actual	Plan*	Actual YTD ¹	Plan*	Plan*
<i>Hydro One</i>	63.1	92.0	64.3	82.8	65.6	69.1	66.9	68.3

* Plan amounts reflect the forecast spend

¹ Year to Date Actual Spend is as of September 30, 2025

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1 **OEB STAFF INTERROGATORY - 06**

2
3 **Reference:**

4 Exhibit A-6-1, Page 22 of 36

5
6 **Preamble:**

7 As the above reference, Hydro One has a well-defined emergency response plan aligned
8 with industry best practices, that identifies position holders across Planning, Operations,
9 Logistics, Emergency Information, and Finance & Administration.

10
11 **Interrogatory:**

- 12 a) Please provide a copy of Hydro One's emergency response plan that was activated in
13 response to the Z-factor event.
- 14
- 15 b) Please describe how Hydro One monitored and documented compliance with the
16 emergency response plan during the event.
- 17
- 18 c) Please discuss any deviation from this plan during the Z-factor event.
- 19
- 20 d) Please discuss any planned adjustments to Hydro One's emergency plan that were
21 learned from the Z-factor event.
- 22
- 23 e) Does Hydro One have strategies in place for mitigating the impact of storm events,
24 such as vegetation management? If so, please provide the related strategies, and any
25 budget allocated.

26
27 **Response:**

- 28 a) The requested information is included in Attachment 1 to this interrogatory.
- 29
- 30 b) Hydro One monitored and documented compliance with its emergency response plan
31 during the Z-Factor event through existing tools and adaptive measures implemented
32 during the event. When responding to weather events or system disruptions of a
33 smaller scale, Hydro One relies on established checklists and support tools to guide
34 staff and ensure that expectations are met. These tools assist in documenting key
35 actions and maintaining compliance with procedural and safety requirements.

36
37 During the Z-factor event, Hydro One's regular processes, systems, and tools were
38 significantly strained due to the scale of the event. To maintain compliance with the
39 DEMP, staff provided real-time oversight to ensure Hydro One's response to the Z-

1 Factor event was consistent with the DEMP and aligned with established emergency
2 management principles.

3
4 c) In advance of the storm, Hydro One took actions consistent with the DEMP, initiating
5 forecast monitoring, staff mobilization readiness, and stakeholder engagement. Upon
6 receiving weather alerts, Hydro One declared Level 1 and 2 emergencies throughout
7 the day of the storm, culminating in the DEMP being activated at Level 3, the highest
8 response level. At that level, the storm response is corporate-wide with significant
9 mobilization across key internal functions, including Distribution System Operations,
10 Lines, Work Management, Design Services, Forestry Services, and Emergency
11 Management and Business Continuity. Over 3,000 internal staff and 1,500 mutual aid
12 line personnel were mobilized to respond in a safety-first manner. However, the
13 severity of the storm was so significant that additional capacity was needed to maintain
14 safety, accelerate restoration, and address urgent community needs. To agilely
15 respond to the magnitude and widespread nature of the storm, Hydro One adapted its
16 response procedures in a manner consistent with the intent and objectives of the
17 DEMP.

18
19 **Dynamic restoration approach:** Under standard procedure, restoration activities are
20 coordinated through the Customer Automated Dispatch System (CADS), with crews
21 dispatched to individual outage tickets in priority sequence based on safety and
22 customer impact. During the Z-factor event, system damage overwhelmed the CADS
23 capacity and made ticket-by-ticket restoration impractical and inefficient. In response,
24 the Operations Centres implemented a dynamic, feeder-based restoration strategy,
25 dispatching line crews, damage assessors, and forestry teams to restore entire
26 feeders or network segments concurrently. Hydro One will assess whether such a
27 response alternative should be integrated into the DEMP on a go forward basis.

28
29 **Splitting restoration between operations centers:** Each Operations Centre is
30 responsible for restoration activities within its defined geographic service area with
31 coordination through the Provincial Emergency Operations Centre when cross-area
32 support is required. As a result of the exceptional workload and infrastructure damage
33 experience during the Z-factor event, some Operations Centres became overloaded
34 with restoration calls. To maintain progress, Hydro One temporarily reassigned work
35 across multiple Operations Centres enabling teams in less-affected areas to take on
36 restoration tasks and dispatch crew outside their usual jurisdiction.

37
38 **Addressing Emerging Safety Issues:** Under the DEMP, line crews are dispatched
39 based on system restoration activities prioritized within the CADS workflow. During the
40 Z-Factor event, Hydro One established dedicated line crews in each highly impacted
41 Operations Centre to address urgent community safety issues reported through

1 municipal and Emergency Management partners. While it is not standard practice for
2 Hydro One to establish dedicated crews in this manner, the action was a necessary
3 and safety driven decision to address immediate safety hazards.

4
5 d) See Interrogatory I-05-16.

6
7 e) Hydro One has an integrated approach to mitigate the impact of storms. Below, Hydro
8 One has listed the programs that help mitigate storm impact, among other things:

- 9 • Distribution engineering standards - Evaluating and revising existing transmission
10 and distribution line and station design standards against historic climate trend
11 data to ensure our standards can meet the challenges of changing climate
12 conditions, including incorporation of hardening considerations and new
13 technologies.
- 14 • Vegetation Management - Helping ensure appropriate vegetation management for
15 rights-of-way to minimize the risk of tree contacts and fall-ins during wind and
16 weather events. This includes Hydro One's new "Outliers" program (2024), which
17 addresses sections with higher tree-caused outages that are facing abnormal
18 ecological variables (e.g., adjacent to lakes, perpendicular to wind corridors, storm
19 alley, silvicultural conditions).
- 20 • Emergency management processes - structures processes to enable a
21 coordinated and efficient response to an event.
- 22 • Distribution Grid Modernization of Worst Performing Feeders - Deploying remotely
23 controllable switches and communicating faulted circuit indicators to allow rapid
24 location and sectionalization of outages to enable restoring power to as many
25 customers as possible following extreme weather events.
- 26 • Distributed Energy Resources - Deploying distributed energy resources in the form
27 of battery energy storage to provide backup power to customers impacted by
28 outages due to extreme weather events.
- 29 • Lines System Renewal - Incorporating new design criteria to prepare for future grid
30 resiliency by designing and implementing solutions and functionality to improve
31 "withstand-capability" and restoration times following extreme natural events.

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DISTRIBUTION EMERGENCY MANAGEMENT PROCEDURE

October 3, 2023

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Record of Change to Dx Emergency Response Structure

The Emergency Management and Business Continuity team sets the framework for emergency response structures at Hydro One. The Provincial, Regional and Local level emergency management response structures cannot be changed without approval from the EMBC team and agreement among members of the Storm Team and signatories.

#	Description	Date	Requestor	Updated
09	Addition of Stations Services to RACC structure – Derecho lessons learned	November 6, 2023	Alisha Khan Senior Manager, Emergency Management and Business Continuity	Yes
08	Structure alignment to Incident Management System	October 18 th , 2023	Alisha Khan as per CEO direction to align with IMS	Yes
07	Rostering for the Regional and Local Resource & Performance Monitor and Communications Liaison function must be considered. The functions are required, however it is undetermined which staff will fill those functions.	November 18, 2022	Manager, Work Management Anthony Pellecchia	Yes
06	Emergency response structure: Aligned Regional and Local content with final RACC training materials	November 10, 2022	Dx Lines Dave Garland	Yes
05	Emergency response structure: Add Work Log Protection to a function at the Local Area Command Center. Added to Local Restoration Coordinator to oversee work protection is complete.	August 10, 2022	Eastern Region Communications Operations Manager Mark Novosad	Yes
04	Emergency response structure: Add Safety Officer to Regional Area Command and Local Area Command Center structures.	August 10, 2022	Eastern Region Superintendent Jeff Bracken	Yes
03	Emergency response structure: Add Communications Liaison function to the Regional Area Command Center.	August 10, 2022	Eastern Region Superintendent Jeff Bracken	Yes
02	Emergency response structure: Add Provincial Field Business Center (FBC) function and Provincial	July 25, 2022	Alisha Khan	Yes

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	Damage Assessment function to the EOC-D structure.		Manager, Emergency Management & Business Continuity	
01	<p>Emergency response structure, roles, responsibilities: Original structures within former ERIP 270 were not aligned with the Incident Management System (IMS).</p> <p>Merged former ICC-D with the EOC to create EOC-D (specific for Dx emergencies) and absorbed ICC-D structure.</p> <p>Updated alignment between Local, Regional and Provincial structures.</p>	February, 2022	Robert Haromszeki Director, Emergency Management & Reliability Compliance	Yes

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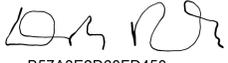
Approval

Reviewed and approved by



Ted Lyberogiannis
Director, Integration, Reliability & Emergency Management
Hydro One Networks Inc.

Date: 2/27/2024

DocuSigned by:


Derek Roles
Director, Distribution System Control
Hydro One Networks Inc.

Date: April 14, 2024

DocuSigned by:


Jermey Schutt
Director, Distribution Lines
Hydro One Networks Inc.

Date:

DocuSigned by:

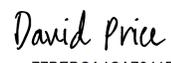

Gianni DiFilippo
Director, Distribution Lines Work Management
Hydro One Networks Inc.

Date: April 11, 2024

DocuSigned by:
Emre Aydin

Emre Aydin
Director, Design Services
Hydro One Networks Inc.

Date: April 11, 2024

DocuSigned by:


David Price
Director, Forestry Services

Date: April 16, 2024

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Hydro One Networks Inc.

Introduction

Purpose

The Distribution Emergency Management Procedure (DEMP) acts as an agreement between **Distribution System Operations, Distribution Lines, Distribution Work Management, Design Services, Forestry Services and Emergency Management & Business Continuity** to support preparedness and response coordination during large-scale Distribution events. It provides an overview of the provincial, regional, and local functions that can be activated to respond to distribution emergencies.

The objectives of this document are to:

- Promote coordination between all levels of the emergency response organization, provincial, regional, and local levels.
- Promote consistency within all levels of the emergency response organization.
- Document the structure, functions, roles, and responsibilities of the provincial, regional, and local level emergency response organization structures.
- Provide guidelines for emergency response activation.
- Provide an overview of formal emergency declaration.

Scope

The following are included in the scope of this document related to the provincial, regional, and local levels of the emergency response organization (ERO).

- Overview of the ERO structures.
- Descriptions of functions within each Dx ERO structure (LACC, RACC, EOC-D).
- High-level responsibilities of each function within each level of the ERO.

The following is not included in this document:

- How each function is performed.
- The specific Hydro One staff that will fill each specific function.

Applicability

This plan is applicable when any level of the ERO requires activation to respond to large scale distribution emergency events. The Emergency Management and Business Continuity team will support response coordination during province-wide emergencies requiring Emergency Operations Center activation. There are several layers of the emergency response organization that can be active to support distribution emergencies:

- Provincial level – Emergency Operations Center (referred to as EOC-D)
- Regional level – Regional Area Command Center (referred to as RACC)
- Local level – Local Area Command Center (referred to as LACC)

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Position holder assumptions

- All activated members of the ERO are responsible to promote safety, commitment to Hydro One's corporate objectives and support efficient restoration to customers.
- An individual can fill more than one function, ensuring it can be performed safely and aligned with Hydro One work practice.
- Position holders support preparedness activities (e.g., support emergency response directory updates, participate in training).
- Functions at any level may be activated before an emergency is declared to support pre-staging and preparedness activities in anticipation of an emergency event (e.g., extreme weather).
- Position holders have the flexibility to delegate specific functions or tasks where safe and appropriate.
- Position holders are required to actively participate in their function to promote alignment between provincial, regional, and local level response.
- Post incident, position holders are responsible to support continuous improvement within their line of business (e.g., participate in after action review, report near-misses, failures and other concerns that do not support efficient restoration.).

Provincial, regional, and local level coordination assumptions

- Regional and local level coordination calls and planning will be complete in advance of the EOC-D calls which are typically scheduled for 10AM, 3PM and 8PM.
- All active members of the ERO will maintain all regular reporting requirements throughout the event to support effective Incident Action Planning.

Supporting documents

- **Corporate Emergency Management Plan (CEMP):** the CEMP outlines Hydro One's commitment to emergency management and provides descriptions for all Emergency Operations Center (EOC) functions for an all-hazard activation.
- **Emergency Response Directories (ERDs):** the EOC-D and RACC-D emergency response directories identify the functions and position holder names that are rostered to fill each function. Note, an ERD is not maintained for the local level due to the Front Line Managers and Utility Trades Supervisors 2's filling the LACC roles based on availability at the time of the emergency. ERDs are located on the Emergency Management and Business Continuity page located [here](#).
- **Storm Page:** the storm page maintained by Distribution Lines and is located [here](#). It has many resources to support storm restoration.

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Activation guidelines

Distribution System Operations, Distribution Lines, Distribution Work Management and Forestry Services can work together to activate resources in anticipation of an event. Formal emergency declaration is not required to pre-stage or prepare members of the ERO to become active. Once an incident occurs resulting in impact to the distribution system, the following guidelines can be considered:

1-2 Local Area Command Centers	Continue working with the Control Center
3+ Local Area Command Centers	Consider activating Regional Area Command Center
2+ Regional Area Command Centers	Consider requesting EOC activation

Activation Authority for Local & Regional Area Command Centers & the Emergency Operations Center

Activations	Authority to request activation	Incident management accountability	General emergency level
Local Area Command Center	Control Center	Control Center	Elevated
Regional Area Command Center	Control Center Local Area Command Center(s)	Dx Lines Superintendent Regional Area Commander	Level 1,2
Emergency Operations Center (Distribution)	Control Center Regional Area Command Center(s)	Director, Dx System Operations or VP System Operations EOC Commander	Level 1,2,3

Depending on the nature of the incident, it is possible for LACCs, RACCs and the EOC-D to activate proactively.

For further emergency level guidelines, see the [Appendix A - Distribution Emergency Level Classification](#)

The EOC-D can become active if:

There is anticipated weather or an event that may impact large portions of the service territory. The EOC-D can be activated to coordinate and oversee preparatory activities.

- Weather or an event has impacted large portions of the service territory.
- A specific incident has occurred which may or has resulted in a safety incident, significant brand and reputation risk or any other impact to Hydro One corporate objectives related to the Distribution system.

EOC-D activation authority

- The Dx System Control, Senior Manager on shift can request that the Director, Dx System Operations (or delegate) activates the EOC-D.
- The Director, Dx System Operations has authority to activate the EOC-D.

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- Once the EOC-D is activated, the Director, Dx System Operations assumes the role of the EOC-D Commander.
- The EOC-D Commander oversees all activities at the provincial level and promotes coordination with the regional and local levels.
- The EOC-D Commander is accountable to maintain communication with the Executive Leadership Team (ELT) if required.

EOC activation process

- The EOC-D Commander activates the EOC-D by notifying all position holders via email and phone call as identified in within the Emergency Response Directory (ERD).
- The EOC-D Commander must notify the standby Emergency Management Team at phone number 416-603-4308 when activating the EOC-D.
- The notification to position holders should include the activation level (pre-staging or a declared level as defined in Appendix A) and a Microsoft Teams meeting invitation with call in credentials to join the meeting.
- During exceptional circumstance the EOC-D may be activated in-person at the ISOC, OGCC or a designated emergency facility to facilitate emergency response coordination.

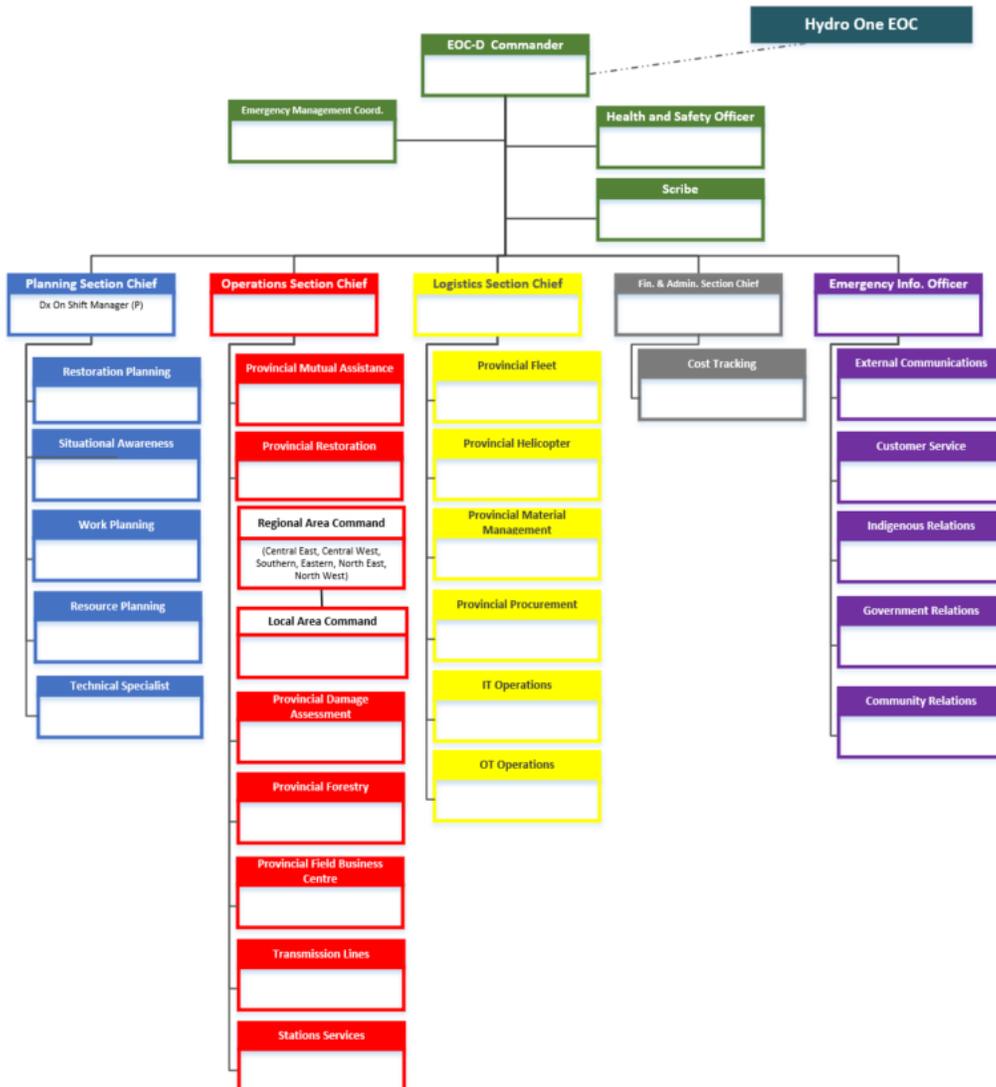
EOC-D Deactivation

- EOC-D Commander reviews if overall incident objectives have been met.
- Reviews the situational awareness provided by the Operations Section Chief and other EOC members on the status of regional and local level restoration efforts.
- Clearly deactivates EOC-D functions and EOC-D as required.
- Note: Regional and local area command centers can remain active conducting restoration clean up once the EOC-D is deactivated.

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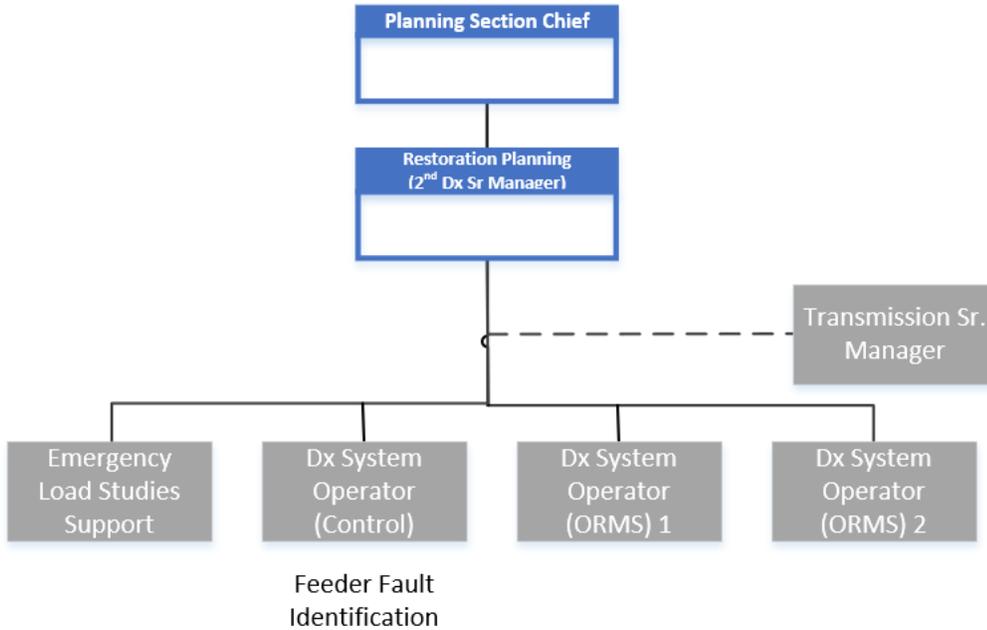
Emergency Operations Center – Distribution (EOC-D) structure

Activation of EOC-D functions is at the discretion of the EOC-D Commander. The EOC Commander is responsible to oversee effective coordination is carried out among the EOC-D, Regional Area Command Center (RACC) and Local Area Command Center (LACC) via the Operations Section Chief.



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Restoration Planning



Restoration Planning functions are under the accountability of the Planning Section.

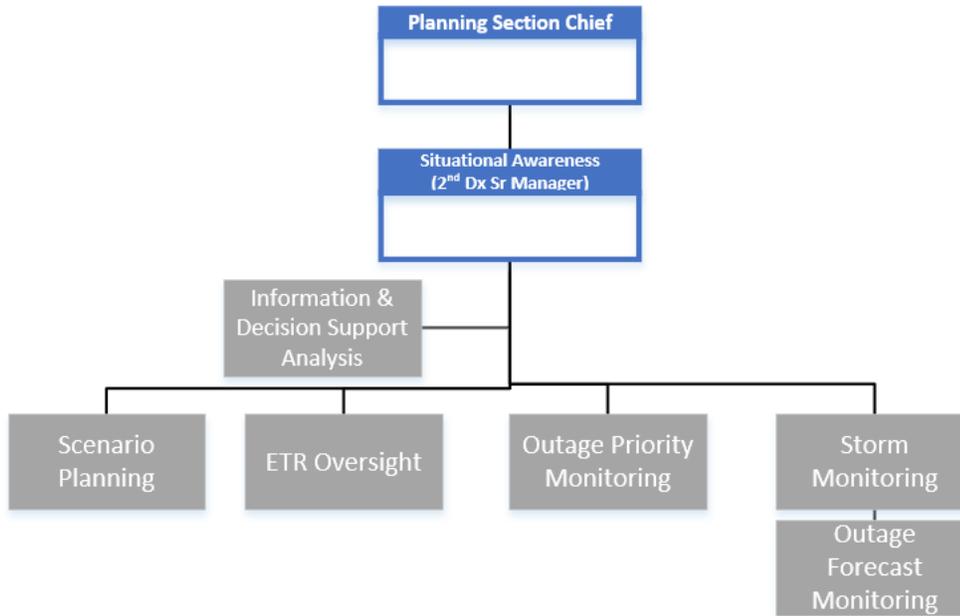
DX System Operator (ORMS) 1

DX System Operator (ORMS) 2

Situational Awareness

Situational Awareness functions are under the accountability of the Planning Section.

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Regional Area Command Center (RACC) structure

A Regional Area Command Center (RACC) can be activated for any Hydro One region. It is lead by the Regional Commander and is under the accountability of the Operations Section. The Regional Commander reports to the Operations Section Chief. Activation of all functions within the RACC is at the discretion of the Regional Commander.

RACC activation process

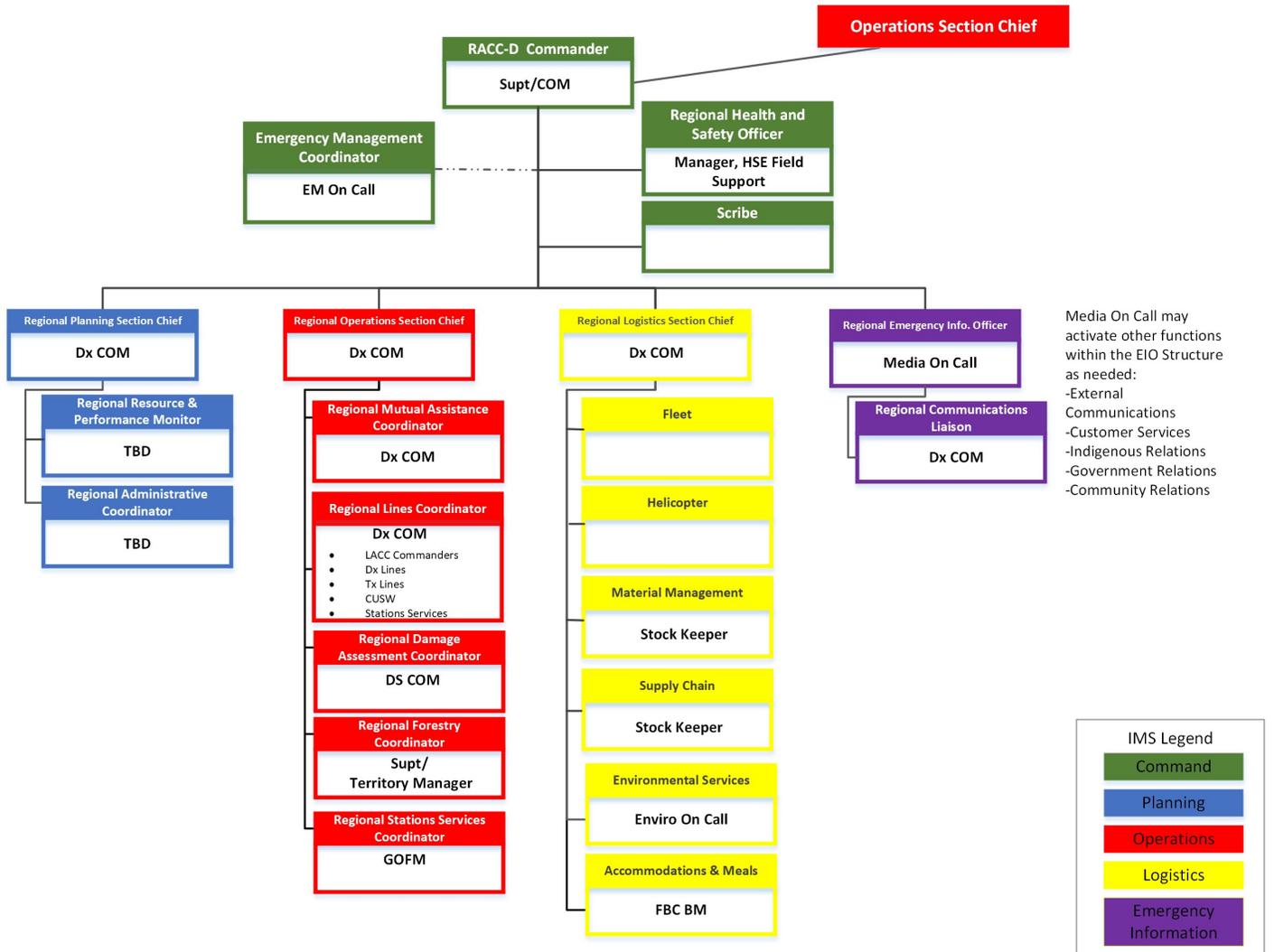
- The RACC Commander activates the RACC by notifying all position holders via email and phone call as identified in within the Emergency Response Directory (ERD).
- The RACC Commander must notify the standby Emergency Management Team at phone number 416-603-4308 when activating the RACC.
- The notification to position holders should include the activation level (pre-staging or a declared level as defined in Appendix A) and a Microsoft Teams meeting invitation or the requirement to attend the physical RACC locations.

RACC Deactivation

- RACC Commander reviews if overall incident objectives have been met.
- Reviews the situational awareness provided by the Operations Section Chief and other RACC members on the status of regional and local level restoration efforts.
- Clearly deactivates RACC functions and RACC as required.

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Note: LACCs can remain active conducting restoration clean up once the RACC is deactivated.

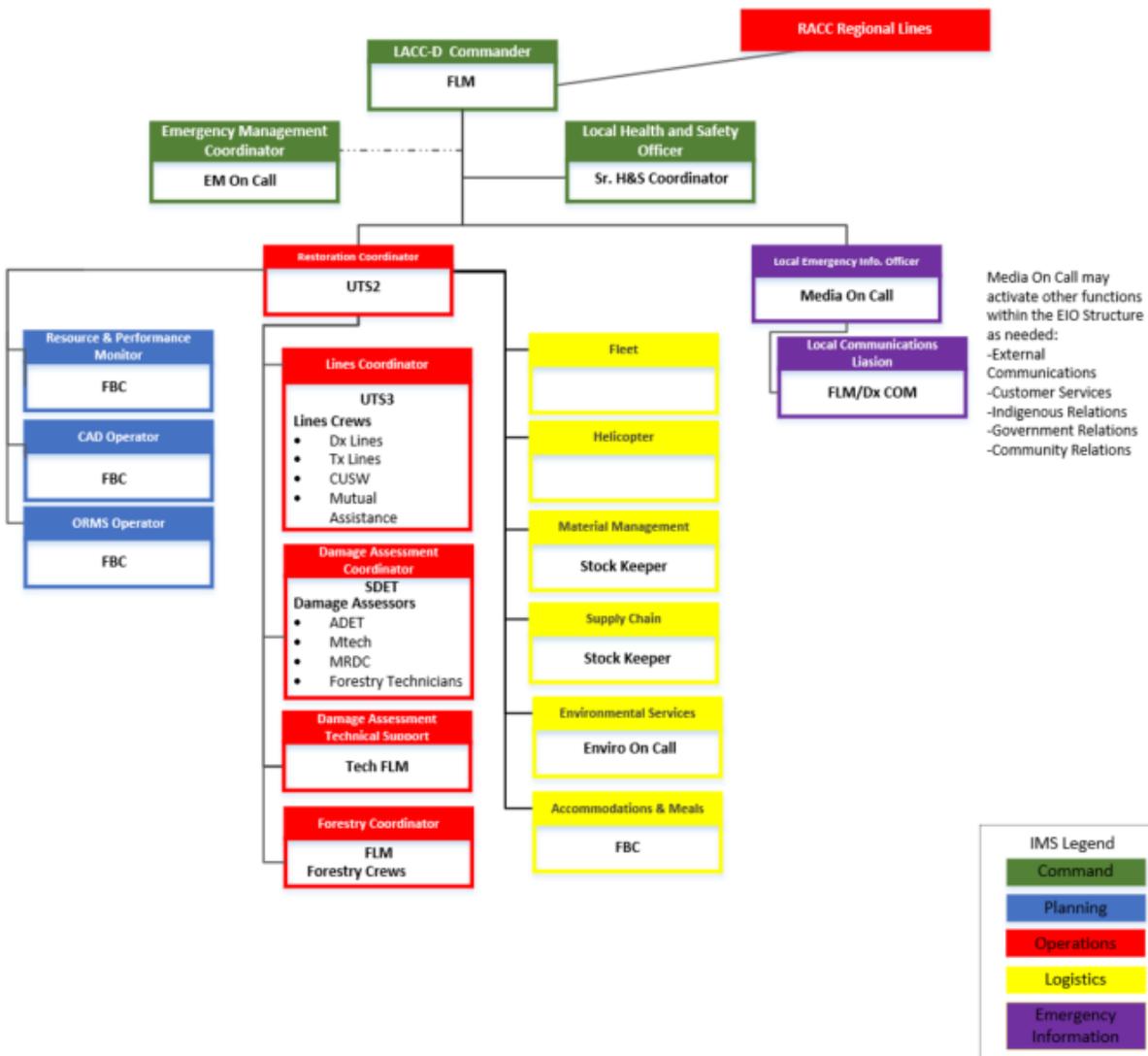


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Local Area Command Center (LACC) structure

A Local Area Command Center (LACC) is led by the Local Commander. The Local Commander reports to the Regional Lines Coordinator within the RACC. The LACC is under the accountability of the Operations Section. Activation of all functions within the LACC is at the discretion of the Local Commander.

Instructions on how to activate a LACC is found in the Distribution Lines Managing a Storm in Ops Dispatch work instruction which is located on the [storm page](#).



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EOC Command Function Descriptions

EOC-D Commander

The role responsible for overall management of the emergency, including the establishment of EOC-D team, incident objectives/strategies and the overall coordination of incident activities. It is the responsibility of the EOC-D Commander maintain coordination among all levels of response, ensuring any activated Regional Area Command Centers has a coordination point within the EOC Team.

Emergency Management Coordinator

The EM Coordinator is part of the Command Staff portion of the EOC Team. This role is responsible for supporting the EOC Team members by ensuring emergency and business continuity-related functions are complete with supporting response. This role heavily supports the EOC Commander with managing overall incident response and the Planning Section in managing the readiness of the Incident Action Plan (IAP). Additionally, this role is responsible for supporting the efficient execution of incident response.

Health & Safety Officer

The Health & Safety Officer is part of the Command Staff of the EOC Team. This role is responsible for monitoring and assessing safety hazards or unsafe situations and developing measures to ensure personnel safety. While each member of the ERO manages the safety of both themselves and their team, the Health & Safety Officer is responsible for overall incident safety and alignment with safety policies.

Scribe

The scribe is responsible for taking notes during EOC-D briefings as well as documenting key activities, events, agreements, action items and any matters of significance throughout the incident within the Incident Action Plan (IAP) document.

EOC Planning Function Descriptions

Planning Section Chief

During a large-scale distribution emergency, the Planning Section Chief is responsible for all planning-related functions, including central control and dispatch, situational awareness, and work prioritization. In addition, the Planning Section provides leadership and direction related to restoration activities and priorities to support Operations in carrying out effective and efficient restoration.

The Planning Section Chief must update the Incident Action Plan in advance of all Emergency Operations Center meetings. The Planning Section Chief is also responsible for overseeing and managing the following functions.

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Restoration Planning

Restoration Planning is responsible for the safe operation of Hydro One’s transmission and distribution systems. This group is responsible to handle dispatch early in the restoration when the number of incidents can be effectively managed by dispatch, prior to Local Area Command Center restoration.

Restoration Planning is comprised of the following functions:

Restoration Planning Lead – this function is performed by the Dx System Operations Senior Manager on shift. All regular accountabilities are maintained, with the additional responsibility of ensuring the Incident Action Plan (IAP) is updated with relevant information related to the event on behalf of Restoration Planning.

Transmission Senior Manager – this function is performed by the Tx System Operations Senior Manager on shift

Emergency Load Studies Support – the function of conducting emergency feeder studies and load transfers for external support (e.g., if an entire station is lost, function includes planning its transfer to an adjacent feeder if required). This function is responsible to recommend the transfer of interrupted load to alternative sources and performing the electrical studies related to voltage and current limit. This function provides this recommendation back to the Dx System Operator (Control) and is fulfilled by the Technical Services support group.

Dx System Operator (Control)

Dx System Operator (ORMS)

Situational Awareness

Situational Awareness is comprised of the following functions:

Situational Awareness Lead – the function of ensuring all situational awareness-related requirements are collected, documented, and made available to the EOC during response.

Information & decision support analysis – the function of reviewing the overall storm picture, including future weather forecasts, communicating directly to service providers, and advising where resources are required, decision-making on where to move resources. This function includes gathering, consolidating, analyzing, and sharing incident and status information.

Scenario planning – the function of scenario planning for Dx load balancing in cases where complex scenarios must be considered.

ETR oversight – the function of maintaining provincial situational awareness on ETRs.

Outage priority monitoring

Storm monitoring – maintaining up-to-date situational awareness related to storm prediction and forecasting. This function includes ensuring input is provided to the Incident Action Plan.

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Outage forecast monitoring

This function is responsible for monitoring outage forecasts and resource demand modeling. In addition, this includes guiding resource shortages and surpluses.

Work Planning

This function is responsible for prioritizing planned or unplanned distribution system work and whether work needs to continue or be postponed in response to transmission emergency events.

Resource Planning

This function is responsible for identifying, forecasting and allocating best fit and qualified human resources and continuously monitoring the availability of resources in the field against damage prediction and outage information. Maintains provincial oversight of all resources and makes suggestions on the pre-planning placement of resources within the province. This is a joint planning effort between Dx System Control, Dx Lines, Dx Work Management. This function includes deciding which work will come off and be rescheduled.

Technical Specialist

Technical Specialist is activated anywhere within the Emergency Response Organization (ERO), including the Planning Section of the EOC Team. This role is responsible for providing special skills that may be required to manage an incident.” Technical Specialist expertise can include Human Resources, Legal, Employee Relations, Cyber Security, and Physical Security.

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EOC Operations Function Descriptions

Operations Section Chief

During a large-scale distribution emergency, the Operations Section Chief oversees the safe execution of all operational restoration activities throughout the response. In an activated EOC they are responsible for consolidating situational awareness, progress, and risks for all active Regional Area Command Centers. In addition, they are accountable for overseeing the pre-staging of all restoration field resources, decision-making on conflicting restoration priorities within the regions, and ensuring restoration activities align with provincial objectives. The Operations Section Chief is responsible for overseeing and managing the following functions.

Provincial Mutual Assistance

This function includes overseeing province-wide mutual assistance field resources and decision-making on escalated issues and prioritization. The Provincial Mutual Assistance Coordinator supports restoration efforts by acting as the main point of contact with ONMAG and NAMAG. This function provides an overview of damage within the service territory (actual or expected), the number of resources required for support, guidance on specialized resources/equipment, and direction as to where and when incoming mutual assistance resources are required to report to. This function includes constant situational awareness of the progress and status of mutual assistance resources operating to support the Hydro One restoration effort.

Provincial Restoration

This function is responsible for leading and overseeing province-wide restoration efforts in each activated Regional Area Command Center (RACC). This function provides resolution of escalated issues and direction on prioritization of restoration within the province, including the movement of resources between regions if required. In addition, this function is responsible for continuously sharing information with the Planning Section to enable situational awareness and decision-making during distribution emergency events.

Provincial Damage Assessment

This function includes overseeing province-wide damage assessment efforts in each activated Regional Area Command Center (RACC). In addition, this function provides direction on resolution of escalated issues and direction on prioritization of damage assessment within the province, including the movement of damage assessment resources between regions if required.

Provincial Field Business Center

This function includes overseeing province-wide functions supported by staff from the Field Business Centers (FBCs). This function oversees all FBC-related resources activated in each activated Regional Area Command Center (RACC). In addition, this function provides resolution of escalated issues including the movement of resources between regions if required.

Provincial Forestry

This function is responsible for enabling oversight of all activities in Forestry division and providing operationally sound advice to Operations Section Chief.

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Transmission Lines

This function is responsible for enabling oversight of all activities in Tx Lines division and providing operationally sound advice to Operations Section Chief.

Stations Services

This function is responsible for enabling oversight of all activities in Stations Services division and providing operationally sound advice to Operations Section Chief.

EOC Logistics Function Descriptions

Logistics Section Chief

The role responsible for providing facilities, resources, services, and materials in support of the incident. This role with activating and supervising resources within the Logistics Section, which are required to support executing response objectives. This role is part of the General Staff within the EOC and reports to the EOC Commander.

Provincial Fleet

This function is responsible for making fleet assets available to Operations Section for the entire duration of responding to a distribution emergency. This includes providing mechanical support and ensure repair and maintenance of fleet assets during emergency response.

Provincial Helicopter

This function is responsible for making helicopter assets available to Operations Section for the entire duration of responding to a distribution emergency. This includes providing mechanical support and ensure repair and maintenance of helicopter assets during emergency response.

Provincial Materials Management

This function is responsible for ensuring availability of material to Operations Section required for responding to a distribution emergency for the entire duration of emergency. This includes re-ordering, re-stocking and delivering of material as required during emergency response.

Provincial Procurement

This function is responsible for providing administrative support in procuring goods and services and managing existing vendor contracts required for the entire duration of a distribution emergency.

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IT Operations

This function is responsible for providing technology support to any other functions within the Corporate Domain for the entire duration of a distribution emergency.

OT Operations

This function is responsible for providing technology support to any other functions within the Operation Technology Domain for the entire duration of a distribution emergency.

EOC Finance & Administration Function Descriptions

Finance & Admin Section Chief

The role responsible for financial and administrative support to an incident; including all business processes, cost analysis, financial and administrative aspects. This role is responsible for providing and supervision to the EOC Team related to compliance with financial policies, regulatory and legal requirements.

Cost Tracking

This function is responsible for providing cost tracking guidance to the incident; including providing guidance on the creation and management of the work orders assigned to the storm, monitoring mutual assistance LDCs and Contractors for post-event reimbursement and providing recommendation on post-event cost tracking.

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EOC Emergency Information Officer

Emergency Information Officer

This role responsible for overseeing the development, approval and dissemination of approved communications both internal and external for the organization. This role is required to maintain oversight of all response, demobilization and recovery activities in order to develop timely, relevant and transparent communications throughout the lifecycle of incident's response. This role also keeps the EOC informed of current and emerging issues shared up through position holders within its section.

Communications & Marketing

This function is responsible for developing and disseminating external and internal communications for the organization through various owned and earned channels along with ongoing media and social media monitoring.

Customer Service

This function is responsible for taking customer outage notification calls and coordinating messaging via the Customer Care Centre. This includes providing Customer Services Reps with approved messaging from Communications, updating the outage banner map and managing customer call volumes.

Indigenous Relations

This function is responsible for liaising with impacted Indigenous Communities and Chiefs impacted by the emergency.

Government Relations

This function is responsible for liaising and updating Government Officials (Ministry Officials and Members of the Provincial Parliament) impacted by the emergency.

Community Relations

This function is responsible for liaising with municipal officials impacted by and during an emergency. This includes communication with local Mayors, CAO's and councilors providing them updates on the emergency and status updates.

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Regional Area Command Center Function Descriptions

Regional Commander

This function provides command and control of the Regional Area Command Center (RACC) and all restoration activities within their assigned region. This function includes evaluating and directing restoration response pre-staging requirements. This function also directs operations within the RACC on regional restoration activities, maintaining overall situational awareness, and finalizing the Incident Action Plan (IAP) for restoration within the region. In addition, this role is responsible for overseeing the requirements of crews and resources moving within the area and providing decision-making authority on restoration and prioritization activities. This function provides overall leadership, execution, and responsibility for regional response, confirms regional priorities, and allocates resources (e.g., labour, material, and equipment), requesting additional resources from outside of the region and monitoring progress & performance goals. In cases where there are conflicting requirements between regions for resources, the Regional Commander escalates decision-making to the Operations Section Chief as required. This role will report to the Operations Section Chief within the EOC. In cases where the region has many response activities to complete, the Regional Commander may activate an alternate RACC Commander to assign a specific section.

Emergency Management Coordinator

This function is staffed by the Emergency Management On Call representative and is responsible for providing support to the RACC as required. This role may contact the Community Emergency Management Coordinator to notify them of longstanding ETRs, request support for road clearing from the local road department, can assist with escalating support for accommodation, meal and fuel issues.

Regional Health & Safety Officer

This function provides safety expertise and oversight to manage restoration activities. This role is responsible for ensuring safe work practices are followed in the field through the deployment of Health & Safety field representatives. This function ensures Health & Safety representatives are appropriately deployed to affected areas. This role effectively manages the use of Health & Safety resources through team calls with team status and outage updates. This role responds to and supports reporting for any incidents, near misses, and safety catches.

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Scribe

The scribe is responsible for taking notes during RACC briefings as well as documenting key activities, events, agreements and any matters of significance throughout the incident within the Incident Action Plan (IAP) document.

Regional Planning Section Chief

This function is responsible for planning restoration within the region by assessing outages, prioritizing calls and providing recommendation on resource work assignments. This role oversees the Regional Resource & Performance Monitor, and Regional Administrative Coordinator, ensuring that all CADs are organized, ETRs are monitored and crew assignments are tracked.

Regional Resource & Performance Monitor

This function maintains a comprehensive view of systems data to support the RACC team members' ability to maintain situational awareness across the region. This function maintains a comprehensive list of field resources (e.g., lines, forestry, local ORMS status operators, mutual assistance, contractor, damage assessment, Field Business Center staff and all other activated resources) to support the restoration effort within the region. This function is responsible for mobilizing CAD and ORMS operators at the Local Area Command Centers. They are required to manage the effective use of resources at the regional level, and resolve Ops Support related issues throughout the RACC and LACC restoration efforts. In addition, this function includes ensuring continued coverage is maintained overnight and supporting the Regional Commander with resource tracking if required. This role also oversees regional ETRs and coordinates with the Local Resource and Performance Monitor to ensure all ETRs are complete and accurate. In addition, this function oversees regional 911 response times & coordinates with local performance monitors. This role is also responsible for identifying opportunities for improved response/restoration to the RACC.

Regional Administrative Coordinator

This function maintains a comprehensive view of crew information, locations, release status, and accommodation alignment. This function also ensures that field resources (e.g., lines, Forestry, local ORMS status operators, monitoring iDashboard etc.) information is up to date and aligned within the region. This role monitors crew transfers and external contractors to ensure accurate up-to-date information is available to the Regional Commander.

Regional Operations Section Chief

This function is responsible for overseeing the safe execution of all operational restoration activities with the region. They are accountable for consolidating situational awareness, progress, and risks for all active Local Area Command Centers. In addition, they are accountable for overseeing the pre-staging of all restoration field resources, decision-making on conflicting restoration priorities within the region, and ensuring restoration activities align with regional objectives. The Operations Section Chief is responsible for overseeing and managing the following functions.

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Regional Mutual Assistance Coordinator

The function serves as the regional liaison between the RACC the other Utilities and contractors that are supporting restoration through mutual assistance. The function coordinates resources to support restoration efforts across the region. This function includes ensuring Local Commanders provide safety orientation, enforcing work practice processes and protocols, and formal MA crew tracking (e.g., crew arrival and departure dates/times, crew numbers, locations, and hours worked). In addition, this function may include representing Hydro One on mutual assistance calls through ONMAG or NAMAG if requested by the Provincial Mutual Assistance Coordinator. They also ensure that completed documentation has been submitted to Business Support.

Regional Lines Coordinator

This function is responsible for strategizing and making recommendations related to the regional deployment of Dx Lines crew resources and coordinating the execution of regional restoration command decisions. By assessing regional damage forecasts and assessments they can provide recommendations on regional restoration priorities and estimate regional resource requirements (e.g., labour, materials, equipment). This role consolidates and monitors regional resource availability and utilization, ensuring call outs and staff scheduling are performed/completed. In addition, they are responsible for managing regional overnight staffing plans, align resources with regional outage priorities, escalate resource shortfalls, monitor the status of work planning, ETRs, and restoration/repair work. This role is also responsible for reviewing and directing the movement of all resources (materials, fleet, and helicopter) within the region as well as maintaining communication/collaboration with Local Restoration Coordinators.

Regional Damage Assessment Coordinator

The function of coordinating resource requirements for damage assessment within the region, determining damage assessment priorities and allocating resources from across the region. This role is responsible for maintaining situational awareness of outage incidents, customers affected, damage assessment requirements, and the deployment of DA resources within the region. In addition, this function includes consultation with the Regional Lines Coordinator and the control center to evaluate damage assessment priorities and consider implications for resources across the region. This role is also expected to provide recommendations to the Regional Commander on restoration areas of priority and highlight significant resource requirements and shortfalls.

Regional Forestry Coordinator

This function ensures that forestry resources are available and mobilized to support regional damage assessment and regional restoration. This function strategizes and makes recommendations related to the regional deployment of Forestry crew resources and coordinating the execution of regional restoration command decisions. In addition, they manage the effective use of Forestry resources at the regional level and resolve forestry related issues throughout the storm response. They may also identify Forestry resources that can assist in expanded storm roles such as: Damage Assessment, POWG, Training, etc.

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Regional Stations Services Coordinator

This function is responsible for enabling resources within the Stations zone to support distribution restoration including; wire guarding, supply delivery and operational support as requested by the Operations Section Chief or RACC Commander.

Regional Logistics Section Chief

This function works closely with the Operations and Planning Section Chiefs to meet the resource needs of the region including; fleet, helicopter, materials, supply chain, environment and accommodation and meal requirements. This role will prioritize resource and asset deployment across the region, understanding and monitoring the needs and requests of all activated LACCs.

Fleet

Fleet Services is a support function during all Dx emergency emergencies. This function is consistent at the provincial, regional, and local level. Regional and Local Commanders are responsible for arranging the movement of equipment and assets in the field. In addition, this function is responsible for identifying fleet availability at local garages, providing assistance to locate off-road machines, and identifying available mechanics to support the LACC during restoration efforts. Additionally, fleet services oversee the re-assignment of mechanics from scheduled repair work to priority repair work in pre-staging efforts as required. This role may also be required to obtain rental vehicles as requested by RACC or LACC.

Helicopter

Helicopter Services is a support function during all Dx emergency emergencies. This function is consistent at the provincial, regional, and local level. Regional and Local Commanders are responsible for providing direction on pre-staging, and response priorities of the placement of helicopters to support response. This role will collaborate with the Regional Lines Coordinator and Regional DA Coordinator, to prioritize Helicopter resources to align with regional requirements. In the early phases of response, they support the damage assessment process by providing aerial patrol for assessing damage in areas that are difficult to access or in cases where expedited assessment is required. During the storm restoration phase of response, they support the movement of crews, setting poles, and changing transformers to expedite response. This role may liaise with regional heli-service providers to determine what is possible and make recommendations to the RACC on that basis.

Materials Management

Materials management is a support function during all Dx emergency incidents. This function is consistent at the provincial, regional, and local levels. In addition to operating the Barrie Warehouse 24/7, this group also ensures that supplies are moving within the province / region / local area and effectively prioritized. In addition, this function determines the availability of next-day materials and proposes potential workarounds. Additionally, this function includes identifying material shortfall risks. This role supports Dx restoration by engaging key suppliers of critical components, replenishing necessary inventory, and providing emergency transportation services to/from/between sites and direct from vendor to site, as required.

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Supply Chain

Supply Chain is a support function during all Dx emergency incidents. This function is consistent at the provincial, regional, and local levels. This function supports the fulfillment of emergency resource requirements as well as the expedited priority access to materials and services that are not readily available within the inventory and unique to the nature of the response effort.

Environmental Services

Environmental Services is a support function available during all Dx emergency incidents, as required, and is consistent at the regional and local levels. The primary function includes responding to and reporting spill events that arise because of damaged assets from the emergency incident. This function also includes managing internal and external environmental resources (e.g., staffing, contractors, equipment) and reporting to the Regional Commander on environmental events that may garner significant regulatory, media, or public interest. Local representation of Environmental Services may be present at Local Area Command Centers.

Accommodations & Meals

This function serves as the point of escalation for LACC Accommodation & Meals resource when they have exhausted local options for accommodations and other logistical support needs and will identify opportunities to use regional resources when necessary.

Regional Emergency Information Officer

This function communicates the approved internal and external messaging for the organization. This includes maintaining oversight of all response, demobilization, and recovery activities to draft relevant and accurate information throughout the response lifecycle. This function ensures that all messaging is consistent across all channels and approved by the EOC Commander or commander at the regional or local level.

Regional Communications Liaison

This function supports the Regional Commander to respond to inquiries from media relations (Public Information Officer), media/community relations (Liaison Officer) or the Emergency Management Coordinator. This function is required to investigate key issues that arise throughout the response that require specific updates (e.g., the ETR for a critical or key customer, on a specific feeder). An individual filling this function will be required to interface with the Public Information Officer, Liaison Officer or Emergency Management Coordinator to provide clear, concise, and timely information. This role serves as the single point of contact for the Public Information Officer within the region. This function provides written and verbal communications to the Public Information Officer to support, provincial and community leaders, the media, other Utilities, and large customers seeking information about the outage restoration as directed. This role serves as the buffer between the RACC and the LACC teams and the rest of Hydro One to insulate the storm response teams from being distracted from the business of restoring power by having to respond to requests for information.

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Local Area Command Center Function Descriptions

Local Commander

The Local Commander is responsible for leading, coordinating and providing direction to the Local Area Command Center (LACC) team. This function oversees all response activities within the LACC related to health and safety, restoration priorities, and setting local response objectives. This function provides real-time information regarding customer count, 911 calls, ETRs, restoration plans, and priorities to Regional Lines Coordinator and the Regional Commander. This function includes supporting staging for restoration and driving restoration priorities. In addition, this role re-prioritizes restoration activities as needed based on factors such as community health and safety and or critical infrastructure requirements. The Local Commander is responsible for completing the transfer of crews between LACCs and making requests to the Regional Lines Coordinator for additional resource support when required. Local Commanders must ensure Crew Transfer sheets are up to date, enforcing accuracy to support effective accommodation planning. The Local Commander function also completes the acceptance and release of crews within the area. This role is also responsible for overseeing mutual assistance crews supporting Hydro One in restoration efforts, including providing a safety orientation, enforcing work practice processes and protocols, and formal MA crew tracking (e.g., crew arrival and departure dates/times, crew numbers, locations, and hours worked). The Local Commander participates in RACC discussions related to resource movements and makes requests for additional resources as required. This role is also responsible for implementing RACC decisions. In cases where the local area has many incidents/events in the system or response activities to complete, the Local Commander may decide to assign a specific area to another position holder or delegate the Planning and Logistics responsibilities of the Restoration Coordinator to another resource to allow that position holder to focus on restoration activities.

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Emergency Management Coordinator

This function is staffed by the Emergency Management On Call representative and is responsible for providing support to the LACC as required. This role may contact the Community Emergency Management Coordinator to notify them of longstanding ETRs, request support for road clearing from the local road department, can assist with escalating support for accommodation, meal and fuel issues at the local level.

Local Health & Safety Coordinator

This function is staffed by the Sr. Health and Safety Coordinator and is responsible for ensuring safe work practices are followed in the field through information sharing with visiting crews and onsite safe work guidance. They provide Health & Safety support to field resources through WSOs, coaching and mentoring as well as respond to and support reporting for any incidents, near misses, safety catches. This role ensures that storm packages are prepared, complete and ready for distribution to each crew. This function will conduct crew orientations by identifying key technical overviews, hospital locations and general area risks and mitigations. In addition they reiterate job planning expectations and advise crew of work protection logging process/contacts.

Resource & Performance Monitor

This function is responsible for maintaining the data integrity in the local restoration data systems to support the Local Area Command Center team. This includes monitoring and actioning existing ETRs within the ORMS system that are nearing expiry. In addition, this role contacts local field resources to gain progress and updates and make required adjustments in CAD. This function includes monitoring 911 calls, performing callbacks (as required), and reclassifying incidents by confirming if the call reported by emergency services poses an actual health and safety risk. This function is responsible for overseeing and reporting impending failures/areas of concern to the Restoration Coordinator. This role may also ping Meters to verify outages/power on. The Local Resource & Performance Monitor, ORMS Operator, and CAD Operator are functions that work closely together. Depending on the volume of incidents, these functions can be performed by multiple position holders.

CAD Operator

The function of updating the status of incidents that have been assigned to field staff (e.g., on-site, en-route, etc) and monitoring and adjust ETRs as directed. This includes communicating with field crews to gain status updates and escalating issues to the Restoration Coordinator where required. The Resource & Performance Monitor, ORMS Operator, and CAD Operator are functions that work closely together. Depending on the volume of incidents, these functions can be performed by multiple position holders.

ORMS Operator

The function of monitoring ORMS for 911 calls, new calls and identifying duplicate calls. This function works with the Damage Assessment Coordinator and the Restoration Coordinator to ensure calls are prioritization and scheduled. This function can also include sending trouble sheets to line crews and actioning various activities resulting from damage assessment and pinging meters. The Resource & Performance Monitor, ORMS Operator, and CAD Operator are functions that work closely together. Depending on the volume of incidents, these functions can be performed by multiple position holders.

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Restoration Coordinator

The Restoration Coordinator is responsible for coordinating the deployment of crews (Lines, Tx TLC, CUSW Construction, and Mutual Assistance) to support the safe restoration of power to the greatest number of customers as quickly as possible with the resources they are provided. This includes coordinating restoration and planning activities (e.g., the ratio between apprentices and line staff), allocating resources (e.g., labour, materials, equipment, etc.), monitoring the status of damage assessment, work planning, ETRs, and restoration / repair. In addition, this function includes focusing on crew productivity, reduced windshield time, and monitoring job and work completion according to estimates. The Restoration Coordinator is also responsible for monitoring and overseeing the Utility Work Protection Code. Accepts LACC Activation

Lines Coordinator

This function is responsible for coordinating the deployment of all Lines resources assigned to the area including; Dx Lines, Tx Travelling Lines Crews, CUSW Construction Crews and Mutual Assistance Crews. This role ensures crews receive orientations, are assigned CAD calls, monitors restoration progress and provides recommendation to the Restoration Coordinator if resources need to be scaled up or down dependent on the demand.

Each crew is responsible to provide regular updates to the ORMS Operator as their status on each assignment changes. This information is used by the Local Resource and Performance Monitor for reporting.

Damage Assessment Coordinator

This function is responsible for coordinating the deployment of damage assessors to inform restoration planning with the resources they are provided. This function ensures damage assessment moves forward quickly and effectively within the local area in addition to raising resourcing requirements. This function includes determining damage assessment priorities and allocating resources to assess damage. They are responsible for performing orientation for Damage Assessors, completing crew transfers and maintaining records. This function will demobilize damage assessors when they are no longer needed to support the response. In collaboration with the Restoration Coordinator, this role will determine damage assessment and restoration priorities and allocate resources from within the area. They are also responsible for productivity, quality, and timely completion of DA reports.

Damage Assessors

The function of observing Hydro One assets in the field, assessing damage, collecting specific damage-related information that enables the Restoration Coordinator to determine priority, crew size, material, and pre-work requirements. Required to remain onsite where public safety is at risk. All crews must provide regular updates to the ORMS Operator as their status on each assignment changes. This information is used by the Resource and Performance Monitor for reporting.

Damage Assessment Technical Support

The function of supporting call-outs for damage assessors and ensuring canvassing is complete and reported to the Regional and Local Damage Assessment Coordinators. This function is responsible for supporting orientation for Damage Assessors, completing crew transfer sheets (and maintaining records), and demobilizing damage

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assessors as they are no longer needed to support response. In addition, this function is responsible for managing Damage Assessors in the field, ensuring work is conducted safely and teams can perform work effectively.

Forestry Coordinator

This function manages forestry resources, crew composition and assigns forestry work to Forestry Crews as per direction from the Restoration Coordinator. A local Forestry FLM or delegate fills this function. The Forestry Coordinator is responsible for monitoring the use of forestry crews within the local area. If additional forestry resources must be moved between regions, this function includes making requests to the Regional Forestry Coordinator as needed. This function includes managing all of the work performed by forestry crews within the local area and ensuring each crew is provided with a sufficient number of work assignments. In addition, it includes ensuring that their status is reported to the ORMS Operator for the update. This function also involves ensuring that no resources are released from restoration activities at a local level until approved by the Regional Forestry Coordinator and the Restoration Coordinator. This role also identifies Point Of Work Grounding (POWG) capable resources and deployment opportunities.

Forestry Crews

Forestry crews that regularly work with Hydro One are certified utility arborists that can work on the Hydro One system. All crews must provide regular updates to the ORMS Operator as their status on each assignment changes. This information is used by the Local Resource and Performance Monitor for reporting.

Fleet

Fleet Services is a support function during all Dx emergency emergencies. This function is consistent at the provincial, regional, and local levels. Regional and Local Commanders are responsible for arranging the movement of equipment and assets in the field. In addition, this function is responsible for identifying fleet availability at local garages, providing assistance to locate off-road machines, and identifying available mechanics to support the LACC during restoration efforts. Additionally, fleet services oversee the re-assignment of mechanics from scheduled repair work to priority repair work in pre-staging efforts as required. This role may also be required to obtain rental vehicles as requested by RACC or LACC.

Helicopter

Helicopter Services is a support function during all Dx emergency emergencies. This function is consistent at the provincial, regional, and local level. Regional and Local Commanders are responsible for providing direction on pre-staging, and response priorities of the placement of helicopters to support response. This role will collaborate with the Restoration Coordinator and Damage Assessment Crews, to prioritize Helicopter resources to align with regional requirements. In the early phases of response, they support the damage assessment process by providing aerial patrol for assessing damage in areas that are difficult to access or in cases where expedited assessment is required. During the storm restoration phase of response, they support the movement of crews, setting poles, and changing transformers to expedite response. This role may liaise with regional Heli-service providers to determine what is possible and make recommendations to the LACC on that basis.

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Materials Management

Materials management is a support function during all Dx emergency incidents. This function is consistent at the provincial, regional, and local levels. In addition to operating the Barrie Warehouse 24/7, this group also ensures that supplies are moving within the province / region / local area and effectively prioritized. In addition, this function determines the availability of next-day materials and proposes potential workarounds. Additionally, this function includes identifying material shortfall risks. This role supports Dx restoration by engaging key suppliers of critical components, replenishing necessary inventory, and providing emergency transportation services to/from/between sites and direct from vendor to site, as required.

Supply Chain & Purchasing

Supply Chain and Purchasing is a support function during all Dx emergency incidents. This function is consistent at the provincial, regional, and local levels. This function supports the fulfillment of emergency resource requirements as well as the expedited priority access to materials and services that are not readily available within the inventory and unique to the nature of the response effort.

Environmental Services

Environmental Services is a support function available during all Dx emergency incidents, as required, and is consistent at the regional and local levels. The primary function includes responding to and reporting spill events that arise because of damaged assets from the emergency incident. This function also includes managing internal and external environmental resources (e.g., staffing, contractors, equipment) and reporting to the Regional Commander on environmental events that may garner significant regulatory, media, or public interest. Local representation of Environmental Services may be present at Local Area Command Centers.

Accommodation & Meals

The Accommodations & Meals function is responsible for managing accommodation and meal requirements for Dx Lines, DA, Forestry crews and other resources deployed within the local area. This role will escalate support requirements to the Regional Logistics Coordinator when local resources have been exhausted or the Emergency Management Coordinator.

c This includes maintaining oversight of all response, demobilization, and recovery activities to draft relevant and accurate information throughout the response lifecycle. This function ensures that all messaging is consistent across all channels and approved by the EOC Regional or Local level Commander.

Local Communications Liaison

Same description as the Regional Communications Liaison, supporting at the local level if needed.

EOC Command Functions – Checklist Responsibilities by Role

EOC-D Commander

- Determine and communicate Level of Hydro One Distribution Emergency

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- Activate all functions that are required to support emergency response by phone calls in conjunction with email.
- Set briefing cycle (generally 10am, 3pm, 8pm) and schedule first briefing.
- Set expectations for all activated EOC-D to contribute to IAP and approve IAP documents for circulation.
- Set expectations and provide objectives to Planning and Operations Section Chiefs outlining a restoration strategy co-ordination
- Approve technical content of all information releases to government agencies and officials, customers and other stakeholders, news media
- Drive accountability of all activated resources
- Deactivate the EOC-D and consider if outstanding issues can be resolved through normal staff action/ remaining activated RACCs or LACCs.

Emergency Management Coordinator

- Support the EOC-D Commander in activating EOC-D structure and setting the operational cycle.
- Develop an EOC-D schedule, identifying primary and alternate position holders activated as required.
- Monitor emergency situation and provide recommendation on Technical Specialists or other functions that can be activated to support emergency response ie. Human Resources, Legal.
- Manage communication with impacted Community Emergency Management Coordinators and Critical Infrastructure stakeholders – work with Emergency Information Officer Section to obtain approved messaging to align communications with.
- Provide support to RACC and LACCs as required.
- Contribute to the development IAP.

Health & Safety Officer

- Determine overall health and safety objectives for emergency response.
- Ensure activated RACC and LACC Health and Safety Officers are aware of priorities, monitor and provide support as required.
- Periodically evaluate the status of the emergency situation as it relates to health-, safety- and environment-related activities in progress. Establish objectives and set (adjust) priorities, as needed. Assign, re-assign, or release support staff accordingly.
- Notify the EOC-D Commander and Command team of health and safety concerns or incidents that occur during emergency response operations.
- Contribute to the development of the IAP.
- Demobilize as required.
- Ensure long-term health and safety activities are assigned as required to be corrected post-incident.
- Prepare feedback for After Action Review.

Scribe

- Responsible for keeping notes for EOC Commander, record information received by the EOC Commander, and their decisions and their rationale.

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- Document pertinent information to the EOC Commander and during EOC briefings – contribute to the IAP as directed by the EOC Commander.
- Perform scribing of records information verbatim at times when necessary.

EOC Planning Functions – Checklist Responsibilities by Role

Planning Section Chief

- Activate members of the Planning Section as required.
- Oversee that the Situational Awareness Unit Leader is activated and supporting the collection of information from ERO sections.
- Support the EOC team to understand enterprise impact of the incident.
- Lead the development of the Incident Action Plan.
- Be able to provide the EOC team with clear situational awareness, damage impact, and risks.
- Ensure the objectives have considered all risks and support an effective response.
- Oversee the documentation of incident objectives within the IAP.
- Advise of emerging issues or trends.
- Provide advice where possible on best estimates for planning and next steps.
- Lead development of the IAP.
- Flag issues that must be raised to the EOC or Executive Leadership Team (ELT).
- Review and approve the IAP once complete and share with the Emergency Management Coordinator.
- As required, activate leads for required planning-subgroups to support response.
- Lead recovery planning related activities as required.
- Demobilize Planning Section as required.
- Ensure long-term planning/recovery activities are assigned as required to be corrected post-incident.
- Prepare feedback for After Action Review.

Restoration Planning

- TBD

Tx Senior Manager

- Providing information on which Tx system outages impact distribution

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- Notifying and providing updates to the Central Control and Dispatch Unit Leader (On-Shift Distribution Sr. Manager) of any significant events that affect Loss of Supply for Distribution controlled feeders
- Providing and requesting priority restoration requirements
- Discussing and determining the priority of field dispatches and responding staff with the On-Shift DX Sr. Manager

Emergency Load Studies Support

- TBD

Dx System Operator (Control)

For DX System Controlled assets:

- Directing remote and manual switching.
- Initiating field staff dispatch requests.
- Sectionalizing feeder to restore impacted customers.
- Identifying alternative feeder supplies.
- Initiates emergency load transfer studies.
- Identifying probable damage locations.
- Establishing the require Work Protection and Isolation requirements.
- Collaborating on restore/repair approaches.
- Liaising with LDCs for feeder outages and restoration effort.
- Liaising with TX System Control Operators as required for TX element outages (TX circuits, transformers, and LV buses).
- Providing fault info for incident prioritization.
- Managing and monitoring Dx system for outages
- Notifying the DX System Operator Supervisor/ DX Sr. Manager
- Notifying the DX System Operator (ORMS), to update the ORMS outage prediction model
- Feeder fault identification.

Dx System Operator (ORMS)

- Monitoring "Unassigned" ORMS tickets.
- Dispatching and providing CAD ID # for field staff for 911 requests.

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- Updating outage model opening devices based on call screening or information provided from the field.
- Grouping outages to the impacting device.
- Initiating environment oil spill response procedures and notification dispatches.
- Using sm@rting ping application to determine customers outage status.
- Monitoring ETRs and obtain updates from the field.
- Updating restoration time and outage cause code in ORMS.
- Initiating customer call backs to determine if power restored to all affected customers.
- Re-dispatch as required.
- Overseeing Smart Meter Emergency Recovery Plan.
- Providing damage info on AMI network assets.
- Monitoring AMI Network as Dx system is restored.
- Initiating meter pings or customer call backs and group into appropriate outage.
- Sm@rting.
- Higher-level, grouping outages to open elements on ORMS and assign to Ops Center.
- Grouping calls.
- Identifying and grouping non-connected calls from customers.
- Creating CAD IDs.
- Enabling LOCs to assign crews via the Local ORMS Status Operator.

Situational Awareness Lead

- TBD

Information & Decision Support Analysis

- TBD

Scenario Planning

- TBD

ETR Oversight

- TBD

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Outage Priority Monitoring TBD**Storm Monitoring** TBD**Work Planning** TBD**Resource Planning** TBD**Technical Specialist** TBD

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EOC Operations Functions – Checklist Responsibilities by Role

Operations Section Chief

- Review the situation and determine operational risks and impact.
- Advise EOC team on issues regarding operational-related risks of the overall incident.
- Consider the risks that are present in the event of impact to critical functions.
- Review situation and resource status for number of personnel assigned to incident and request resources from logistics if required.
- Establish operational period in conjunction with Command.
- Activate branches/units/ resources within section as needed and designate Branch Supervisors/ Unit Leaders for each area.
- Brief, and assign work locations and preliminary work tasks to Section personnel.
- Ensure appropriate personnel, equipment, and supplies are in place, including maps, status boards, vendor references, and other resources as required.
- Support the development of incident objectives.
- Identify risks that might impact meeting objectives.
- Provide input to support the collection of situational awareness.
- Provide input to support the development of IAP activities.
- Ensure all activated branches/units/groups are supporting the development of the IAP.
- Work with all groups required to develop specific tactical plans to execute plans and work toward objectives.
- Continuously track progress of all activated branches/units/ groups.
- Continuously review objectives to determine when demobilization is appropriate.
- Demobilize operations resources when required.
- Prepare feedback for After Action Review.

Provincial Mutual Assistance

- Participating in ONMAG and NAMAG mutual assistance calls as required
- Providing detailed resource requirements for mutual assistance request
- Providing a point of contact to the offering utility to coordinate the arrival of mutual assistance crews (e.g., Regional Mutual Assistance Coordinator, or Local Commander)

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- Overseeing that crews are effectively assigned to Local Area Command Centers as required
- Maintaining continuous province-wide visibility of mutual assistance activities and progress
- Providing clear direction/approval on the release of mutual assistance crews

Provincial Restoration

- Overseeing all activated Regional Area Command Centers
- Maintaining coordination with the Planning Section Chief to support restoration activities
- Communicating planning-related priorities to Regional Commanders
- Overseeing that regional restoration efforts are aligned with provincial objectives
- Providing strategic direction and guidance on province-wide restoration efforts
- Approving regional restoration strategies
- Working with the Logistics Section Chief to support the prioritization and movement of logistical resources in the field as required
- Maintaining overall situational awareness on progress, risks and performance of restoration within the province

Provincial Damage Assessment

- TBD

Provincial Field Business Center

- TBD

Transmission Lines

- TBD

Stations Services

- TBD

EOC Logistics Functions – Checklist Responsibilities by Role

Logistics Section Chief

- Review the situation and determine logistical risks and impact.
- Review situation and material status and escalate for additional supplies with vendors if required.
- Ensure resource monitoring and management at the RACC level is occurring and materials are being redistributed amongst impacted areas as required.

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- Ensure appropriate personnel, equipment, and supplies are in place, including Fleet Mechanics, Helicopters and IT support. Work with Leads to coordinator or procure additional resources if required.
- Assist with removing barriers or escalating to EOC-D Commander for additional support on meal and accommodation coordination.
- Arrange for meal, accommodation and transportation for EOC-D members if required.
- Identify risks that might impact meeting objectives.
- Provide input to support the development of IAP activities.
- Ensure all activated branches/units/groups are supporting the development of the IAP.
- Work with all groups required to meet the logistical requirements of specific tactical plans to execute plans and work toward objectives.
- Continuously track progress of all activated branches/units/ groups.
- Continuously review objectives to determine when demobilization is appropriate.
- Demobilize operations resources when required.
- Prepare feedback for After Action Review.

EOC Finance & Admin Functions – Checklist Responsibilities by Role

Finance & Administration Section Chief

- Review the situation and determine financial risks and impact.
- Manages all finance-related activities initiated as the result of the emergency situation, coordinating and prioritizing those activities, where appropriate.
- Monitors and assesses the impacts of the emergency situation, including any business disruptions attributable to the emergency situation, assuring that sufficient funding is available to support incremental expenditures.
- Assures that Hydro Ones' spending policies are followed and approval authorities are respected.
- Provide input to support the collection of situational awareness.
- Provide input to support the development of IAP activities.
- Ensure all activated branches/units/groups are supporting the development of the IAP.
- Continuously track progress of all activated branches/units/ groups.
- Continuously review objectives to determine when demobilization is appropriate.
- Demobilize operations resources when required.
- Prepare feedback for After Action Review.

EOC Emergency Information Officer Functions – Checklist Responsibilities by Role

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Emergency Information Officer

- Review the situation and determine communication/reputational risks and impact.
- Establish communications cycle to ensure messaging shared amongst activated function is consistent and accurate.
- Ensures the timely release of emergency situation-related accurate, reliable, and understandable information to employees, governmental officials and agencies, direct customers, retail customers, other stakeholders, the news media, and the general public.
- Ensure approved messaging is circulated to EIO representatives at the RACC and LACC levels.
- Coordinates the review and approval of the technical content of any information releases with the EOC Commander.
- Coordinates with the Technical Specialist (Legal) when required, for recommendations and advice regarding the legal implications associated with the release of emergency situation-related information to employees, governmental agencies and officials, customers and other stakeholders, the news media, and the general public.
- Periodically evaluate the status of the emergency situation as it relates to communications-related activities in progress. Establish objectives and set (adjust) priorities, as needed. Assign, reassign, or release support staff accordingly.
- If the CMST has been activated, establish and maintain communications with the Hydro One CMST Representative.
- Monitors and evaluates customer and other stakeholder concerns.
- Coordinates the approval of all information releases to major customers and other stakeholders.
- Provide input to support the development of IAP activities.
- Ensure all activated branches/units/groups are supporting the development of the IAP.
- Continuously review objectives to determine when demobilization is appropriate.
- Formally close out communications with any organizations or individuals contacted by you in support of emergency response and recovery efforts.
- Demobilize operations resources when required.
- Prepare feedback for After Action Review.

Regional Area Command Center – Checklist Responsibilities by Role

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Regional Commander

- Reporting to the Operations Section Chief (within the EOC, if activated)
- Providing overall leadership and execution direction for regional response
- Ensuring the following Hydro One authorities are notified:
 - Director, Distribution Lines
 - Dx Senior Manager on shift
 - EOC Commander (if activated)
 - Emergency Management Coordinator
- Activating position holders within the RACC and document activation time
- Allocating resources (e.g., labour, materials, equipment) within region
- Escalating to Provincial Restoration Coordinator as required
- Requesting additional resources from outside region (if required)
- Supporting coordination among Local Area Command Centers
- Overseeing escalated restore/repair decisions from Local Area Command Centers
- Allocating resources within region based upon regional priorities
- Establishing briefing cycles (e.g., 9:00 hrs, 14:00hrs and 19:00hrs) and ensuring all participants are included on a meeting invitation
- Ensuring briefing cycles are aligned with EOC calls (suggested 1 hours prior to EOC calls)
- Ensuring Incident Action Plan (IAP) activities are provided in advance of each EOC call
- Providing input into Incident Action Plan:
 - Key issues: items related to restoration that can impede efficiency, cause risk to public health or safety, or prolong restoration
 - Next steps: refers to the high-level plan of meeting overall incident objectives between operational periods
 - Considering the following:
 - Restoration requirements for initial emergency (911 calls), potential safety issues preventing or slowing down crews (weather conditions, closed roads etc.) and logistical constraints
 - Restoration requirements for 1-3 days
 - Restoration requirements for 4-7days
- Directing Local Commanders to canvas crews for availability and prepare workforce for travel if required

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- Reviewing Outage Predictions and decide when and where to pre-position resources (Lines)
- Considering the health and safety of staff and travel conditions when making a call to pre-position staff
- Coordinates/gains direction from the Operations Section Chief if required.
- Ensuring that the RACC is operational:
 - Verifying that information systems and communication systems with work Centers and field crews are functional
- Continuously updating tools (e.g., Incident Action Plan and iDashboard) as required and monitoring situation:
 - Number of customers without power
 - Number of critical customers without power
 - Number of large distribution accounts (LDAs)
 - LDC load transfer circuits fed by Hydro One
 - Expected duration of the outage, estimated ETRs
 - Extent of damage
 - Workforce and crew / staff support requirements
 - Material requirements
 - Specialized equipment requirements
 - Security concerns
 - Environmental concerns
 - Customer concerns
 - Safety concerns (especially related to working conditions)
 - Status of AMI Network
- Confirming regional priorities/coordinating/taking direction from Operations Section Chief if required.
- Monitoring progress & performance goals
- Developing action plan and assigns restoration priorities and resources
- Confirms regional incident/work prioritization and sequencing
- Continuously considers:
 - Availability of crews
 - Use of outside crews (internal or external mutual assistance)
 - Crew support requirements

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- Orientation and briefings for field crews, LDC's and contractors
- Inventory levels at the emergency location(s)
- Arrangements with suppliers and vendors
- Delivery of material to field crews
- Special equipment requirements
- Staffing considerations (long weekend & holidays (Christmas, Easter or Thanksgiving))
- Environmental protection requirements
- Information technology and telecommunications requirements
- Emergency public information requirements
- Security requirements
- Taking direction/reporting to provincial priorities and cross-regional resource allocations to the Provincial Restoration Coordinator if required
- Collaborating with other Regional Commanders on pre-event planning, preparation, and pre-staging of regional resources
- Providing direction/confirms regional incident/work prioritization and sequencing
- Communicates regional progress and performance goals, monitor status and drive progress
- Monitoring ETR reliability
- Communicating regional progress and performance goals, monitor status and drive progress
- Gathering information and ensure open items are assigned to appropriate personnel for resolution
 - Number of customers remaining without power
 - Status of temporary repairs
 - Estimate time required to effect full service
 - Workforce requirements
 - Any other outstanding issues which issues can be resolved through normal operating procedures
 - Personnel amenities (if warranted)
- Ensuring demobilization will not jeopardize response activities
- Gaining agreement from Central Control & Dispatch to deactivate as required
- Gaining agreement from Operations Section Chief to deactivate as required

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Regional Health & Safety Officer

- TBD

Emergency Management Coordinator

- TBD

Regional Planning Section Chief

- TBD

Regional Resource & Performance Monitor

- Reporting to the Regional Planning Section Chief
- Ensuring CAD and ORMS Operators in the region are called out for each Local Area Command Center
- Managing escalated issues for resolution
- Scheduling overnight staffing for FBC functions as required
- Supporting the Regional Commander in the maintenance of resource tracking (e.g., field resources) as required
- Corresponding with the Regional Lines Coordinator
- Maintaining regional resource information including:
 - Resource names
 - Contact information
 - Resource qualifications and crew type
 - Resource assignments
 - Cost keeping
 - Specialized equipment
- While the Regional Commander and all Coordinators in the RACC are required to complete resource tracking, this function can include supporting resource tracking/monitoring for the region
- Contributing to Incident Action Plan section updates as required
- Managing regional resource demand modeling
- Monitoring and tracking changes in the data to anticipate/forecast issues
- Recommending rest time and release sequences

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- Comparing current incident counts to resource counts and make resource recommendations (e.g., acquiring more resources, demobilizing resources, etc.)
- Monitoring ETRs within the region and providing situational awareness
- Monitoring 911 calls and ensuring Local Resource & Performance Monitor is actioning as required
- Collecting information from activated Local Area Command Centers to maintain regional reporting for iDashboard:
 - Local resource counts
 - ETRs
 - 911 calls

Regional Administrative Coordinator

- TBD

Regional Operations Section Chief

- TBD

Regional Mutual Assistance Coordinator

- Corresponding with the Regional Operations Section Chief
- Ensuring Mutual Assistance tracking is maintained
- Communicating to each Local Commander that the use of the Mutual Assistance tracker template is used for duration of event:
 - crew arrival & departure dates
 - crew numbers
 - locations
 - hours worked
 - expenses
 - issues
- Overseeing that Local Lines Coordinator have collected all documentation, information, costs, statistics and reports for post-incident review
- Overseeing MA administration for resources allocated to region
- Acting as a point of contact (if assigned) for ONMAG or NAMAG (if required)

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- Ensuring MA crews are aligned with work practice and protocols
- Continuously assessing:
 - The status and location of mutual assistance crews in the zone
 - Mutual assistance resources (personnel and materials) that are required
 - Mutual assistance crews, restoration requirements & availability
- Gaining approval from the Provincial Mutual Assistance/EOC that mutual assistance crews are approved to be released, and providing approval to the Local Commander
- Observing whether mutual assistance crews can/should be moved within the region once released from specific locations
- Providing approval to demobilize mutual assistance monitoring and tracking
- Overseeing that demobilization occurs only after all mutual assistance resources have been approved to be released

Regional Lines Coordinator

- Reporting to the Regional Operations Section Chief
- Overseeing all Local Area Command Centers within their assigned region
- Assessing regional damage forecasts & assessments to recommend regional priorities and estimate regional resource requirements (e.g., labour, materials, equipment).
- Consolidating and monitoring regional resource availability and utilization, including callout and staff schedules
- Managing regional overnight staffing plans
- Aligning resources with regional outage priorities and escalating resource shortfalls
- Monitoring status of work planning, ETRs, and restoration/repair work
- Supporting the execution of readiness activities as directed by the Regional Commander
- Communicating restoration plan, strategy goals and daily objectives to Local Commanders
- Coordinating with Regional Damage Assessment Coordinator to review damage assessment plan
- Making restore/repair recommendations to Regional Commander on escalated exceptions
- Working with Materials Management to ensure required materials and equipment are available and delivery logistics are operating effectively
- Coordinating with Environmental Services for escalations or significant issues
- Resolving escalated execution issues

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- Continuously assesses:
 - Location and extent of the outage(s), status of their respective operation centers.
 - Coordination requirements with Regional Damage Assessment Coordinator
 - Coordination with Regional Forestry Coordinator
 - Personnel and material resources required
 - Availability of resources
- Ensuring the LACCS are focusing on the following priorities:
 - 911 Calls
 - Hospitals
 - Life support customers
 - Water and sewage facilities
 - Fire, police and emergency headquarters
 - Radio and television facilities
 - Commercial and industrial customers
 - Residential customers
- Take direction from the Regional Operations Section Chief as required (e.g., during large-scale emergency response, the Regional Commander may dictate response priorities from the EOC Operations Section Chief.
- Ensuring all major restoration activities are complete
- Ensuring any incomplete/outstanding restoration activities are reported to the Regional Commander and the Central Control and Dispatch Unit

Regional Damage Assessment Coordinator

- Corresponding with the Regional Operations Section Chief
- Delegating securing/calling out Damage Assessors and Local Damage Assessment Coordinators to the Damage Assessment Technical Support
- Coordinating pre-staging, based upon direction from Regional Commander
- Analyzing incident reports to assess regional DA resource requirements and allocate DA resources across region
- Providing prioritization direction to local damage assessment coordinators based upon regional incident priorities

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- Monitoring progress of damage assessment; resolve escalated issues
- Monitoring damage assessment performance metrics
- Consolidating and communicating regional damage findings
- Continuously assessing:
 - Availability of resources
 - Progress/delays
 - Any challenges
- Ensuring damage assessment information is being effectively collected with suitable quality control

Regional Forestry Coordinator

- Corresponding with the Regional Lines Coordinator
- Making recommendations to Regional Lines Coordinator on forestry resource requirements
- Coordinating forestry resource availability & allocations as per requests provided or approved by the Regional Commander
- Coordinating with LACC Forestry Coordinator to understand risks, progress and requirements
- Monitoring use of regional Forestry workforce
- Monitoring and coordinating use of Forestry equipment
- Resolving Forestry-related issues
- Rostering resources based on skills and training (e.g., Forestry Grounding)
- Positioning logistical support staff as required at local levels
- Coordinating the H&S Field Support team to be present in the field during restoration activities
- Coordinating Forestry Sweeps with local controlling authority to maximize utilization and preventative impacts from vegetation destabilized during the weather event
- Cataloging affected vegetation threats caused by the weather event but not yet in conflict with electrical apparatus and prioritize mitigation actions with Regional Commander
- Ensuring Forestry resources are clearly demobilized and released from response

Regional Stations Services Coordinator

- TBD

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Regional Logistics Section Chief

- This function is consistent at the provincial, regional, and local level
- TBD

Fleet

- This function is consistent at the provincial, regional, and local level
- Gaining direction on restoration priorities from local, regional, or provincial leadership
- Calling in staff/mechanics to support pre-staging efforts in local garages as per request from Local/Regional Commanders
- Using telematics to identify fleet opportunities upon request
- Calling out local mechanics to provide real-time repairs during storm response
- Identifying and sending mechanics to hardest hit areas as per request from Local/Regional Commanders

Helicopter

- This function is consistent at the provincial, regional, and local level
- Gaining direction on restoration priorities from local, regional, or provincial leadership
- Providing early communication to work groups engaged in regularly scheduled work that they may lose the use of the helicopter due to redeployment to emergency work
- Developing helicopter services staffing allocation especially for weekend emergency response
- Determining the availability of helicopter contractors in the event additional resources are required
- Taking direction from local, regional, or provincial leadership to support damage assessment and restoration
- Supporting initial damage assessment:
 - Ariel patrol for assessing damage
 - Supports Damage Assessors/local crews in accessing off-road areas of the service territory
 - Expedites damage assessment as required
- Supporting storm restoration:
 - Moves crews, supplies, sets poles, changes transformers in areas that are difficult to access, or in cases where expedited/priority restoration is required

Materials Management

- This function is consistent at the provincial, regional, and local level

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- Gaining direction on restoration priorities from local, regional, or provincial leadership
- Coordinating existing materials/supplies in relation to prioritized requirements
- Determining availability of next day materials and potential workarounds (outside region or external supply)
- Continuously identifying material short-fall risks
- Providing early communication to key suppliers of potential impact to DX/TX system to ensure availability on weekends and afterhours
- Ensure availability of emergency trucks for rush deliveries during off-peak hours
- Developing logistics staffing plan especially for weekend emergency response
- Verifying inventory on-hand at the locations where impact is predicted
- Supporting storm restoration:
 - Replenish Local Area Command Centers as required with emergency dedicated deliveries
 - Order Wood Poles and arrange delivery, including spotting poles if required
 - Taking direction from Local, Regional or Provincial leadership to support restoration

Supply Chain

- This function is consistent at the provincial, regional, and local level
- Gaining direction on restoration priorities from local, regional, or provincial leadership
- Reviewing and collecting information on resource requirements
- Confirming that the requirements are not available within existing Hydro One stock and catalogue
- Working with the Line of Business to collect specific details on requirements
 - Time requirement
 - Resource specifications
 - Possible existing vendors (if any)
- Requesting that any follow-ups, or ad hoc requirements resulting in spot buying are sent to **SupplyChainInformation@hydroone.com**
- Reviewing list of vendors and partnerships for availability
- Spot buying for items that are not part of existing contracts
- Creating P-Recs under emergency conditions on behalf of the requestor / line of business (if required)
- Contract management

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- If the item is going to be an ongoing requirement, add the item to the current contract or
- Create an MM and add it to a contract to become a regular purchasing item
- Once a P-Rec is issued, add the item to the catalog

Environmental Services

- Corresponding with the Regional Lines Coordinator
- This function is consistent at the regional and local level
- Coordinating environmental resource availability & allocations, including staffing and equipment
- Monitoring use of regional environmental workforce
- Resolving environmental-related issues
- Continuously assessing:
 - Availability of resources
 - Progress/delays
 - Any challenges
- Positioning logistical support staff as required at local levels
- Coordinating spill response and clean-up with regional damage assessors
- Communicating significant environmental issues to Regional Commander
- Reporting of all environmental incidents into the internal reporting system
- External reporting of environmental incidents to necessary regulatory agencies (e.g., Ministry of Environment, Conservation and Parks, Environment Canada, Municipalities, etc.)
- Liaising with impacted property owners
- Ensuring demobilization occurs only after environmental incident has been remediated and clear plans for property restoration have been prepared

Accommodations & Meals

- TBD

Regional Emergency Information Officer

- Reporting to the Regional Commander
- Consistent at the provincial, regional, and local level
- Managing and developing messaging to be consistent among all channels and audiences

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- Assess appropriate owned and earned channels to use depending on the scenario
- Ensure approved messages are disseminated to all appropriate internal stakeholders

Regional Communications Liaison

- TBD

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Local Area Command Center – Checklist Responsibilities by Role

Local Commander

- Reporting to Regional Lines Coordinator
- Accepting Activation Request for the LACC as per request from Central Control and Dispatch Lead per the Distribution Lines Managing a Storm in the LACC (Ops Dispatch) work instruction found on the [storm page](#).
- Supporting alignment with the Incident Action Plan response objectives
- Communicating incident response objectives / priorities with to the LACC
- Overseeing that crews are updating ETRs and providing updates to the ORMS Operator
- Monitoring Status of Damage Assessment, Work Planning, 911 calls, ETRs, and Restoration / Repair work within local area
- Providing situational awareness for local area
- Conducting call-outs to staff LACC position holders and field staff
- Requesting additional resources from Regional Lines Coordinator if needed
- Considering holding back standby resources as needed (e.g., 911s)
- Recommending incident prioritization to Regional Lines Coordinator for endorsement / refinement
- Communicating incident priorities within LACC to prioritize restoration work for crew assignment
- Overseeing restoration and planning activities
- Managing LACC resource availability schedule
- Managing crew composition (e.g., ratio between apprentices and line staff)
- Allocating resources (e.g., labour, materials, equipment etc.) for LACC
- Monitoring the status of changing ETRs and reporting significant deviations to the Regional Restoration Coordinator
- Focusing on crew productivity, reduced windshield time and monitors time to job and work completion according to estimate
- Responsible to oversee that all input is completed on time for RACC request

Local Health & Safety Coordinator

- TBD

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Emergency Management Coordinator

- TBD

Restoration Coordinator

- Reporting to Local Commander
- Reviewing damage assessment findings to assess work requirements
- Determining asset restoration and/or timing of repair
- Following incident priorities within LACC prioritize restoration work completion and estimate resource requirements for each incident's restore/repair work:
 - skillset / crew type
 - Materials
 - Equipment
 - Transportation
- Assessing availability of resources (crews, materials, equipment, transportation) to meet requirements, scheduling work orders and establishing reliable ETR for each incident
- Working with material management to ensure materials and equipment are available before releasing work for dispatch
- Ensuring iDashboard is displaying accurate regional damage information for reporting purposes
- Monitoring Status of Damage Assessment, Work Planning, 911 calls, ETRs, and Restoration / Repair work within local area

Resource & Performance Monitor

- Reporting to Local Restoration Coordinator
- Monitoring 911s, performing call backs and reclassifying calls as required
- Request reclassifications through Dx System Operator (ORMS) or by CAD field report
- Criteria to reclassify 911 calls includes verification there is no risk to public safety:
 - If emergency services does not stay on-site, due to there being no public safety hazard, it is considered not a risk to public safety and it can be reclassified
 - If OPP reports their detachment is out of power due to a fault, this function includes changing the clue code to a basic no power (due to the absence of an actual public safety hazard)
- Monitoring and communicating with Local Restoration Coordinator and action existing ETRs within the CAD system that are nearing expiry

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- Reaching out to the Local Restoration Coordinator to obtain status updates and record in applicable systems
- Escalating failures/areas of concern to the Local Restoration Coordinator

CAD Operator

- Reporting to Local Restoration Coordinator
- Updating the status of incidents that have been assigned to DA (e.g., DA dispatched) and lines staff (e.g., En-Route/On -Site) and populating field Report in CAD
- Ensuring iDashboard is updated to reflect CAD
- Communicating with field crews and escalating issues to the Local Restoration Coordinator
- Updating CAD with crew status
- Logging work protection or communicating with Local Restoration Coordinator to log work protection
- Completing callbacks to customer as required
- Assigning initial ETR as per direction from Local Restoration Coordinator
- Updating ETR as required

ORMS Operator

- Reporting to Local Restoration Coordinator
- Completing tasks outlined in DA report (i.e., Locates, Bell authorization)
 - Reporting any occurrences of damage to Smart Meter Network Equipment using the Storm AMI Network Hardware form
- Relaying how calls are to be grouped for the incidents based on consultation with Damage Assessment Coordinator and the Local Restoration Coordinator, and providing this direction to the Dx System Operator (ORMS)
- Issuing the Trouble sheet to Lines containing all assigned calls for the crews in the field
- Completing callbacks to customer
 - (e.g., when an M-Class feeder restored, a lateral off the M-Class may or may not be restored.)This function includes calling the customer to confirm restoration
 - The Dx System Operator (ORMS) uses the auto dialer to validate restoration before the incident is closed
 - Pinging meters to verify power off

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Lines Coordinator

- Reporting to Restoration Coordinator
- Manages all Lines resources activated to support emergency response including; Dx Lines, Tx Lines, CUSW and Mutual Assistance crews
- Develops crews list based on experience and ability
- Works with the Restoration Coordinator and Resource and Performance monitor to assign calls to crews, monitor crew work and ensure communication between crews and LACC for ETRs
- Manages incoming external crews, ensuring they are provided with onboarding materials and work packages
- Communicating local resource needs to Restoration Coordinator

Damage Assessment Coordinator

- Reporting to Local Restoration Coordinator
- Oversee DA resourcing
- Coordinating/identifying priorities for DA
- Prioritizing fault locations
- Reviewing iDashboard (priority feeder/information from ORMS) high-impacted feeders to identify customer counts on feeder to inform damage assessment priority, numbers of damage assessors and priority areas (the initiating event might not be the only event on that feeder)
- Determining along with their Lines counterpart, the sequence of damage assessment and informing the CAD Operator
- Scheduling/ assigning incidents to Damage Assessors based on priorities
- Monitoring the volume of work being completed and advising if more DA assignments can be carried out
- Providing regular updates
- Monitoring progress of damage assessments; resolve / escalate issues
- Identifying when Forestry crews are required
- Reviewing accuracy/completeness of damage information reported from the field
- Review all damage assessment findings; provide information to Local Restoration Coordinator for next step
- Instructs Dx System Operator (ORMS) to update incident information in ORMS/enterprise systems

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Damage Assessor

- Reporting to Local Damage Assessment Coordinator
- Conducting damage assessment in field
- Providing regular updates to Local Damage Assessment Coordinator (e.g., status, progress, delays, risks)
- Documenting findings within damage assessment tool
- Taking photos to assist in the planning of restoration work
- Transmitting completed information and photos to Local Damage Assessment Coordinator
- Identifying any occurrences of damage to Smart Meter Network Equipment using the Storm AMI Network Hardware form
- Standing by at locations that have risk to public safety (e.g., wire down locations) or request additional resources if required (e.g., forestry, wire down or wire down guard)

Damage Assessment Technical Support

- Reporting to Local Restoration Coordinator
- Working with Local Damage Assessment Coordinator
- Canvassing for DA availability
- Completing call outs
- Leading orientation for damage assessors
- Completing crew transfer sheets
- Demobilizing damage assessors as required
- Safety
- Field related support if needed
- Media and communications point of contact
- Ensuring iDashboard is displaying accurate regional damage information for reporting purposes

Forestry Coordinator

- Reporting to Local Restoration Coordinator
- Assigning calls to identified/available crew to coordinate forestry crews with lines crews
- Pairing of crews based on local skills and equipment needs. Forestry Grounding/Off Road Equipment/Water access work
- Communicating local resource needs to Regional Forestry Coordinator and track inbound crew eta

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- Conducting localized orientation briefs with inbound crews and log/track specialized equipment received. Example: 70' aerial devices/off road units/ boats
- Providing local contact information and storm room contact list
- Confirming with Regional Forestry Coordinator that inbound crews have been received
- Managing all work performed by forestry crews within the local area
- Ensuring each crew is provided a sufficient number of work assignments
- Overseeing that crews provide updates to the ORMS Operator
- Ensuring that resources are not released from the restoration until approved by the Regional Operations Section Chief
- Canvasses Forestry availability and prepare workforce for travel
- Directs Forestry crews to fuel TWE and prepare equipment
- Pre-positions Forestry crews as directed by the Regional Commander
- Act as a service provider to Damage Assessment and Restoration
- Make recommendations to Regional Forestry Coordinator on forestry resource requirements
- Coordinate forestry resource availability & allocations as per requirements specified / approved by Regional Commander
- Monitor utilization of regional forestry workforce & equipment
- Resolves forestry-related issues
- Periodically assess:
 - Forestry restoration work location and status of zone
 - Human and material resources required
 - Availability of resources
- Determine forestry restoration requirements:
 - Restoration priorities
 - Personnel required / available as per extended hours of work in emergency policy
 - Material required / available
 - Equipment required / available
 - Time required
 - Crew support requirements
 - Safety issues

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- Environmental issues
- Security concerns / issues
- In accordance with Regional Commander objectives and priorities, prepare a restoration plan for the next 24 hours
- Monitor, co-ordinate and adjust plans as necessary:
 - Restoration progress
 - Adjust tasks and priorities, as appropriate
 - Receive restoration priorities from the Local Restoration Coordinator

Fleet

- This function is consistent at the provincial, regional, and local level
- Gaining direction on restoration priorities from local, regional, or provincial leadership
- Calling in staff/mechanics to support pre-staging efforts in local garages as per request from Local/Regional Commanders
- Using telematics to identify fleet opportunities upon request
- Calling out local mechanics to provide real-time repairs during storm response
- Identifying and sending mechanics to hardest hit areas as per request from Local/Regional Commanders

Helicopter

- This function is consistent at the provincial, regional, and local level
- Gaining direction on restoration priorities from local, regional, or provincial leadership
- Providing early communication to work groups engaged in regularly scheduled work that they may lose the use of the Helicopter due to redeployment to emergency work
- Developing helicopter Services staffing allocation especially for weekend emergency response
- Determining the availability of helicopter contractors in the event additional resources are required
- Supporting initial damage assessment:
 - Ariel patrol for assessing damage
 - Supports Damage Assessors/local crews in accessing off-road areas of the service territory
 - Expedites damage assessment as required
- Supporting storm restoration:
 - Moves crews, supplies, sets poles, changes transformers in areas that are difficult to access, or in cases where expedited/priority restoration is required

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- Taking direction from local, regional, or provincial leadership to support damage assessment and restoration

Materials Management

- This function is consistent at the provincial, regional, and local level
- Providing early communication to key suppliers of potential impact to DX/TX system to ensure availability on weekends and afterhours
- Coordinating existing materials/supplies in relation to prioritized requirements
- Determining availability of next day materials and potential workarounds (outside region or external supply)
- Continuously identifying material short-fall risks
- Ensuring availability of emergency trucks for rush deliveries during off-peak hours
- Developing logistics staffing plan especially for weekend emergency response
- Verifying inventory on-hand at the locations where impact is predicted
- Supporting storm restoration:
 - Replenish LACCs as required with emergency dedicated deliveries
 - Order Wood Poles and arrange delivery, including spotting poles if required
 - Taking direction from local, regional, or provincial leadership to support restoration
- Gaining direction on restoration priorities from local, regional, or provincial leadership

Supply Chain

- This function is consistent at the provincial, regional, and local level
- Gaining direction on restoration priorities from local, regional, or provincial leadership
- Reviewing and collecting information on resource requirements
- Confirming that the requirements are not available within existing Hydro One stock and catalogue
- Working with the Line of Business to collect specific details on requirements
 - Time requirement
 - Resource specifications
 - Possible existing vendors (if any)
- Requesting that any follow-ups, or ad hoc requirements resulting in spot buying are sent to **SupplyChainInformation@hydroone.com**

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- Reviewing list of vendors and partnerships for availability
- Spot buying for items that are not part of existing contracts
- Creating P-Recs under emergency conditions on behalf of the requestor / line of business (if required)
- Contract management
 - If the item is going to be an ongoing requirement, add the item to the current contract or
 - Create an MM and add it to a contract to become a regular purchasing item
- Once a P-Rec is issued, add the item to the catalog

Environmental Services

- Reporting to the Local Restoration Coordinator
- This function is consistent at the provincial, regional, and local level
- Coordinating environmental resource availability & allocations, including staffing and equipment
- Monitoring use of regional Environmental workforce
- Resolving environmental-related issues
- Continuously assess:
 - Availability of resources
 - Progress/delays
 - Any challenges
 - Positioning logistical support staff as required at local levels
- Coordinating spill response and clean-up with regional damage assessors
- Communicating significant environmental issues to Regional Logistics Section Chief and Regional Commander
- Reporting of all environmental incidents using the internal reporting system
- External reporting of environmental incidents to necessary regulatory agencies (e.g., Ministry of Environment, Conservation and Parks, Environment Canada, Municipalities, etc.)
- Liaison with impacted property owners
- Ensuring demobilization occurs only after environmental incident has been remediated and clear plans for property restoration have been prepared

Accommodation & Meals

- Reporting to Restoration Coordinator
- Determining personnel that require lodging

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- Reviewing available spaces within local area
- Booking rooms on behalf of each person
- Maintaining visibility of which staff are staying at specific hotels
- Confirming with crew lead/contact person and LACC that room is booked
- Releasing rooms when Restoration Coordinator advises crews/resources have been released

Local Emergency Information Officer

- Reporting to the Local Commander
- Consistent at the provincial, regional, and local level
- Managing and developing messaging to be consistent among all channels and audiences
- Assess appropriate owned and earned channels to use depending on the scenario
- Ensure approved messages are disseminated to all appropriate internal stakeholders

Local Communications Liaison

- TBD

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Appendix A: Distribution Emergency Level Classification

Hydro One uses emergency level classification as a guideline to activate the appropriate resources and select an appropriate emergency lyb for declaration. Considerations such as safety, geographic location, region-specific risks and damage and media/government interest will be considered during both incident management activation, and emergency declaration.

Incident Level	Incident Management Activation	Distribution	Declaration Authority
Elevated	LACC	<p>When one or more of the following criteria occur, approval authority will review situation to determine if/when emergency classification warrants activation:</p> <ul style="list-style-type: none"> • Outage has resulted in 1000- 10,000 customers being interrupted, OR • Outage duration affecting the majority of customers is estimated to be less than twenty-four (24) hours, OR • There are 50-100 active incidents in ORMS 	Dx Senior Manager on shift
Level 1	LACC RACC	<p>When one or more of the following criteria occur, approval authority will review situation to determine if/when emergency classification warrants activation:</p> <ul style="list-style-type: none"> • Outage has resulted in 10,000 – 50,000 customers being interrupted, OR outage duration affecting the majority of customers is estimated to be 1-2 days, OR • There are 100-250 active incidents in ORMS, OR • Outage does not meet above criteria, but communication with local media, critical customer(s), or local government(s) is prudent 	Director, Dx System Control

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Incident Level	Incident Management Activation	Distribution	Declaration Authority
Level 2	LACC RACC EOC-D	<p>When one or more of the following criteria occur, approval authority will review situation to determine if/when emergency classification warrants activation:</p> <ul style="list-style-type: none"> • Outage has resulted in 50,000 – 300,000 customers being interrupted, OR • The expected outage duration affecting the majority of customers is estimated to be 2-5 days or has not been determined, OR • There are 250-500 active incidents in ORMS, OR • Outage does not meet above criteria, but coordinated communication with the media, critical customer(s), local or Provincial government agencies is prudent 	Director, Dx System Control
Level 3	LACC RACC EOC-D ELT	<p>When one or more of the following criteria occur, approval authority will review situation to determine if/when emergency classification warrants activation:</p> <ul style="list-style-type: none"> • Outage has resulted in greater than 300,000 customers being interrupted, OR outage duration affecting the majority of customers is estimated to exceed five days or has not been determined, OR there are greater than 500 active incidents in ORMS, OR • Outage does not meet above criteria, coordinated communication with the media, local or Provincial government agencies and/or other stakeholders is prudent, OR • A Level 2 or 3 transmission, physical security or cyber security related emergency situation is occurring at the same time as a Level 2 distribution-related emergency situation is occurring, OR • A significant (and/or multiple or widespread) offsite environmental impacts (e.g., Regional or Municipal water supply, multiple residential properties or private water supplies) 	VP, System Operations & Stations

OEB STAFF INTERROGATORY - 07

Reference:

1. Exhibit A-6-1, Page 26 of 36, Table 14 to 16
2. Exhibit A-6-1, Page 30 of 36

Preamble:

Hydro One indicated the Recovery Period of Z-factor claims is Jan1, 2026 to December 31, 2027 for Hydro One Distribution, and Jan 1, 2026 to December 31, 2030 for both Peterborough and Orillia Rate Zone (RZs).

Interrogatory:

- a) Please explain the reason why dispose the Z-factor costs over a 2-year period and 5-year period instead of 1-year?
- b) For Peterborough and Orillia RZ's, please provide the bill impact of disposing Z-factor costs over a 1-year and a 2-year period.
- c) Please elaborate on how Medium Density (R1) and Low Density (R2) residential customers are protected from the increases associated with the recovery of Z-factor under the Distribution Rate Protection (DRP) Program, as states in Reference 2.
- d) Please indicate the percentage of bill mitigation R1 and R2 rate classes would receive compared to other rate classes.

Response:

- a) The amounts sought for recovery in this application include capital costs associated with capital in-service additions and asset removal costs. Hydro One has proposed to recover the revenue requirement impact of these in-service additions and asset removal costs over the period up to each RZ's next rebasing application, after which the net book value of the in-service additions will be incorporated into the Rate Base. Hydro One Distribution plans to file its next rebasing application for rates effective in 2028 and has therefore proposed to recover the revenue requirement impact of the Z-factor related costs over the course of 2026 and 2027.

The Peterborough and Orillia RZ's will be rebasing effective in 2031 and as a result Hydro One has proposed to recover their revenue requirement impact of the Z-factor related costs over the course of 2026-2030.

- 1 The proposed recovery period ensures that each RZ recovers the associated revenue
2 requirement amounts in the respective year that the calculation corresponds to.
3 Furthermore, the proposed longer recovery period results in lower customer bill
4 impacts. Lastly, this approach is consistent with the OEB Decision in EB-2022-0317
5 that considered cost allocation and rate design for a Z-factor claim.¹
6
7 b) The requested information is provided in tables 1-4 below:

¹ EB-2022-0317, Decision and Order, page 21.

Table 1 - Z-Factor Bill Impacts for Peterborough RZ – 1-Year Recovery Period

Rate Class	Monthly Consumption (kWh)	Monthly Peak (kW)	Sub-Total						Total	
			A (Distribution Excl Pass-Through)		B (Distribution Incl Pass-Through)		C (Total Distribution and RTSRs)		Total Bill	
			\$	%	\$	%	\$	%	\$	%
Residential	750		\$5.88	26.0%	\$5.88	22.8%	\$5.88	14.3%	\$5.87	4.9%
General Service Less Than 50kW	2,000		\$15.77	31.8%	\$15.77	27.6%	\$15.77	16.6%	\$15.75	5.2%
General Service 50-4,999kW	96,793	218	\$222.06	29.1%	\$222.06	38.3%	\$222.06	10.4%	\$250.93	1.2%
Unmetered Scattered Load	15,477		\$161.27	36.9%	\$161.27	39.3%	\$161.27	22.9%	\$161.11	6.7%
Street Lighting	14,325	42	\$661.70	30.0%	\$661.70	30.4%	\$661.70	27.5%	\$747.72	13.1%
Sentinel Lighting	315	0.4	\$8.04	21.5%	\$8.04	20.2%	\$8.04	19.1%	\$9.09	8.5%

Table 2 - Z-Factor Bill Impacts for Peterborough RZ – 2-Year Recovery Period

Rate Class	Monthly Consumption (kWh)	Monthly Peak (kW)	Sub-Total						Total	
			A (Distribution Excl Pass-Through)		B (Distribution Incl Pass-Through)		C (Total Distribution and RTSRs)		Total Bill	
			\$	%	\$	%	\$	%	\$	%
Residential	750		\$2.94	13.0%	\$2.94	11.4%	\$2.94	7.1%	\$2.94	2.4%
General Service Less Than 50kW	2,000		\$7.88	15.9%	\$7.88	13.8%	\$7.88	8.3%	\$7.87	2.6%
General Service 50-4,999kW	96,793	218	\$111.03	14.6%	\$111.03	19.1%	\$111.03	5.2%	\$125.46	0.6%
Unmetered Scattered Load	15,477		\$80.64	18.5%	\$80.64	19.6%	\$80.64	11.5%	\$80.56	3.3%
Street Lighting	14,325	42	\$330.85	15.0%	\$330.85	15.2%	\$330.85	13.8%	\$373.86	6.6%
Sentinel Lighting	315	0.4	\$4.02	10.8%	\$4.02	10.1%	\$4.02	9.6%	\$4.54	4.2%

Table 3 - Z-Factor Bill Impacts for Orillia RZ – 1-Year Recovery Period

Rate Class	Monthly Consumption (kWh)	Monthly Peak (kW)	Sub-Total						Total	
			A (Distribution Excl Pass-Through)		B (Distribution Incl Pass-Through)		C (Total Distribution and RTSRs)		Total Bill	
			\$	%	\$	%	\$	%	\$	%
Residential	750		\$3.54	11.6%	\$3.54	12.9%	\$3.54	8.5%	\$3.54	2.9%
General Service Less Than 50kW	2,000		\$11.80	15.0%	\$11.80	16.8%	\$11.80	11.3%	\$11.79	3.7%
General Service 50-4,999kW	97,760	222	\$192.32	16.7%	\$192.32	110.2%	\$192.32	11.4%	\$217.32	1.0%
Unmetered Scattered Load	2,148		\$13.30	42.9%	\$13.30	61.4%	\$13.30	22.9%	\$13.29	4.7%
Street Lighting	3,815	31	\$296.73	11.3%	\$296.73	11.3%	\$296.73	10.7%	\$335.30	8.7%

Table 4 - Z-Factor Bill Impacts for Orillia RZ – 2-Year Recovery Period

Rate Class	Monthly Consumption (kWh)	Monthly Peak (kW)	Sub-Total						Total	
			A (Distribution Excl Pass-Through)		B (Distribution Incl Pass-Through)		C (Total Distribution and RTSRs)		Total Bill	
			\$	%	\$	%	\$	%	\$	%
Residential	750		\$1.77	5.8%	\$1.77	6.4%	\$1.77	4.2%	\$1.77	1.5%
General Service Less Than 50kW	2,000		\$5.90	7.5%	\$5.90	8.4%	\$5.90	5.7%	\$5.89	1.9%
General Service 50-4,999kW	97,760	222	\$96.16	8.4%	\$96.16	55.1%	\$96.16	5.7%	\$108.66	0.5%
Unmetered Scattered Load	2,148		\$6.65	21.5%	\$6.65	30.7%	\$6.65	11.5%	\$6.64	2.3%
Street Lighting	3,815	31	\$150.72	5.8%	\$150.72	5.8%	\$150.72	5.4%	\$170.31	4.4%

- 1 c) The Distribution Rate Protection (DRP) program caps the monthly base distribution
2 charge for eligible Hydro One R1 and R2 residential customers. Hydro One's Z-factor
3 claim reflects incremental costs arising from the Z-factor event. While these costs are
4 proposed to be recovered through a Z-factor rate rider, at the next rebasing these
5 costs will form part of base distribution rates as further discussed under part a) above.
6 At that point, the DRP will automatically apply to the base distribution rates. As such,
7 for the interim period Hydro One assumes that the DRP would also apply to the Z-
8 factor rate rider so that eligible customers receive the same protection they would
9 receive once the expenditures are embedded in base distribution rates. This approach
10 is consistent with prior OEB treatment where DRP was applied to comparable riders,
11 including foregone revenue rate rider (EB-2017-0049) and the rate rider to recover
12 misallocated tax savings (EB-2020-0194), thereby ensuring consistent treatment of
13 similar costs across rate periods.
14
- 15 d) Table 23 of Exhibit A-06-01 outlines the bill impacts resulting solely from the Z-factor
16 rate rider for Hydro One Distribution including the impacts on R1 and R2 customers
17 without the application of DRP. When DRP is applied, the Z-factor rate rider impact is
18 mitigated as follows:
19
- 20 • R1: \$1.23 (0.7%)
 - 21 • R2: \$2.49 (1.3%).

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1 **OEB STAFF INTERROGATORY - 08**

2
3 **Reference:**

4 Exhibit A-6-1, Page 7 of 36, Table 3

5
6 **Interrogatory:**

- 7 a) The Major Events listed in the Reference have not all resulted in a Z-factor application
8 being filed. Please explain the reasons for not filing Z-factor application for each
9 applicable event.
- 10
11 b) Please provide a summary of Hydro One's previous Z-factor applications for storm
12 events in the past 10 years and provide the amounts requested and approved by the
13 OEB.

14
15 **Response:**

- 16 a) Hydro One has filed a Z-Factor claim for a major storm system representing the most
17 damaging weather event Hydro One has experienced since its incorporation in 1998.
18 In Exhibit A-06-01 Table 1 Hydro One provided a comparison of this Z-factor event to
19 other recent storm events that qualify as Major Events under the OEB's criteria and
20 for which Hydro One has filed a Major Event Response Report. This table is provided
21 below and has been expanded to demonstrate the magnitude and severity of this event
22 relative to these other major events.
- 23
24 b) Consistent with the OEB's established Z-factor criteria, Hydro One evaluates each
25 Major Event based on its specific facts and circumstances. The rationale for not filing
26 a Z-factor application for past events is not part of the Z-factor criteria, and as such,
27 these considerations are not relevant to this proceeding.

1 **Table 1 - Comparison of the Z-Factor Event to Recent Historical Major Events^{1,2}**

Date	NOV 2020	DEC 2021	MAY 2022	DEC 2022	APR 2023	MAR 2025 (Z-Factor) ³
Type of Event	Wind Storm	Wind Storm	Derecho	Winter Storm	Freezing Rain	Ice Storm
Customer Interruptions (in 1000s)	572	761	890	525	359	1,220
Customer Hours of Interruption (in 1000s)	7,043	8,908	24,141	5,701	5,966	49,008
SAIFI	0.4	0.5	0.6	0.4	0.2	0.8
SAIDI	5.0	6.2	17.0	3.8	4.1	32.7
Net Cost	\$24.4M	\$25.6M	\$109.3M	\$45.5M	\$29.9M	\$196.2M
Above Metrics Relative to MAR 2025 (Z-Factor)						
Incremental Z-Factor Customer Interruptions (in 1000s)	648	459	330	695	861	N/A
	113%	60%	37%	132%	240%	N/A
Incremental Z-Factor Customer Hours of Interruption (in 1000s)	41,965	40,100	24,867	43,307	43,042	N/A
	596%	450%	103%	760%	721%	N/A
Incremental Z-Factor SAIFI	0.4	0.3	0.2	0.4	0.6	N/A
	100%	60%	33%	100%	300%	N/A
Incremental Z-Factor SAIDI	27.7	26.5	15.7	28.9	28.6	N/A
	554%	427%	92%	761%	698%	N/A
Incremental Z-Factor Net Cost	\$171.8M	\$170.6M	\$86.9M	\$150.7M	\$166.3M	N/A
	704%	666%	80%	331%	556%	N/A

¹ 2020 – 2023 Figures per the Major Event Response Reports as filed on the Hydro One website: [Reports and Scorecards | Hydro One](#) Net Costs are inclusive of all distribution rate zones

² Incremental Z-Factor impacts are calculated as the difference between the Mar 2025 Z-Factor and the respective recent historical major event, expressed as both an absolute value and percentage

³ 2025 impacts spanning March 29 – April 14

OEB STAFF INTERROGATORY - 09

Reference:

1. Exhibit A-4-7, Page 3 of 10, Concern #1
2. HONI_Dx_A-04-07-01 Deviation of 2021-2023 Orillia Wheeling Credit Amounts (Existing Agreements)
3. HONI_Dx_A-04-07-02 Deviation of 2021-2023 Orillia Wheeling Credit Amounts (2016-2021)

Preamble:

Staff noticed that the calculation of Orillia Wheeling Credit in Reference 2 differs from that in Reference 3. Total Credit Amount in Reference 2 includes Account 1580, Variance WMS – Sub-account CBR Class B, Account 1584, and Account 1586. However, in Reference 3, the Total Credit Amount includes only Account 1584 and Account 1586.

Interrogatory:

- a) Please explain the variance in the calculation between Reference 2 and Reference 3, as noted in Preamble.
- b) Please update the calculation in Reference 3 using the same methodology applied in Reference 2.

Response:

- a) The calculation of Orillia Wheeling Credits shown in Reference 2 (Exhibit A-04-07-01 for 2021 to 2023) reflects the final disposition of total wheeling benefits (including Accounts 1580, 1584 and 1586). That same methodology to calculate the 2021 to 2023 wheeling credits was used to calculate Orillia RZ's 2024 wheeling credit amounts sought for disposition in this proceeding, as shown in Exhibit A-04-07-03.

In response to the OEB's concerns expressed for accuracy of RTSR billing quantities in the 2025 Decision and Order (EB-2024-0032), Hydro One prepared Reference 3 to show that wheeling benefits calculated using more recent billing quantities for Accounts 1584 and 1586 were not materially different.

Reference 3 does not include Account 1580 because wheeling benefits for this account already uses actual generator output for each year in 2021 to 2023. The OEB's direction in EB-2024-0032 was specifically related to demonstrating accuracy of RTSR wheeling quantities (Accounts 1584 and 1586).¹

¹ EB-2024-0032, Decision and Order, pp. 29-31

Filed: 2025-10-31

EB-2025-0030

Exhibit I

Tab 1

Schedule 9

Page 2 of 2

1 The calculations in Reference 3 do not impact the disposition of wheeling allocations
2 for 2021-2023, and 2024, as the wheeling allocations rely on the calculation shown in
3 Reference 2 above.

4

5 b) Please refer to Hydro One's response in part a) above.

1 **OEB STAFF INTERROGATORY - 10**

2
3 **Reference:**

4 Exhibit A-4-7, Page 7 of 10, Concern #2

5
6 **Preamble:**

7 Hydro One confirmed that the measurement facilities were removed after the integration
8 of OPDC.

9
10 **Interrogatory:**

- 11 a) How will Hydro One maintain the accuracy of billing quantities over longer time
12 periods, such as 10 years from now, as system configuration or load patterns evolve?
13
14 b) Does Hydro One have a plan on how frequently it will assess the accuracy of billing
15 quantities in the future.
16
17 c) Please explain the reason for removing the measurement facilities.
18
19 d) Has Hydro One considered the option of installing a low-cost measurement facility
20 solely for billing purposes?
21
22 e) Please submit the wheeling agreements both before the integration and after the
23 integration.
24

25 **Response:**

- 26 a) The RTSR billing quantities used for the wheeling benefit calculations following the
27 integration of Orillia Power Distribution Corporation (OPDC) were agreed upon by the
28 parties involved (Hydro One and Ontario Power Generation Corporation (OPGC)) and
29 are reflected in the amended wheeling agreements.
30

31 Based on the analysis in Section 4.0 of Exhibit A-04-07 which utilizes more recent
32 billing quantities, and OPGC's confirmation that no material changes are expected in
33 the operation of the two generators, Hydro One and OPGC consider the RTSR billing
34 quantities to remain appropriate. However, should significant change in generation or
35 local load profile at a future time arise, Hydro One will initiate discussions with OPGC
36 to explore options to amend these wheeling agreements in accordance with the
37 provisions contained therein.
38

- 39 b) Please see response to part a) above.

- 1 c) As initially explained in EB-2023-0059, former OPDC and PDI wholesale meters that
2 were previously downstream of Hydro One's existing wholesale meters became
3 redundant after OPDC and PDI integrated with Hydro One. These meters were no
4 longer required as Hydro One settles with the IESO at the most upstream wholesale
5 meter point.¹ Through joint work with the IESO, OPDC and PDI meter service
6 providers (MSPs), Hydro One identified and deregistered these redundant wholesale
7 meters to align with the OEB's consolidation policy that the distribution sector should
8 continue to seek efficiencies.²
9
- 10 d) There has not been a material change between the RTSR billing quantities derived
11 using 2011-2015 data (as stipulated in the amended wheeling agreements) and the
12 more recent 2016-2021 data (as shown in Exhibit A-04-07). As noted in Exhibit A-04-
13 07, OPGC has also confirmed that no material changes are expected in the operation
14 of the two generators. Hence, neither Hydro One nor OPGC has considered the need
15 to install a measurement facility solely for this purpose at this time.
16
- 17 e) Hydro One filed copies of the Wheeling Agreements before and after integration on a
18 confidential basis with the OEB in its prior proceeding (EB-2024-0032) on November
19 11, 2024.

¹ EB-2023-0059, Reply Submission, section 1.2, pp. 6-9

² EB-2014-0138, Rate-Making Associated with Distributor Consolidation, p. 6; EB-2023-0059, Reply Submission, section 1.2, p. 8

OEB STAFF INTERROGATORY - 11

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Reference:

Exhibit A-4-7, Page 7, Concern #3

Preamble:

Hydro One stated that the RTSR billing quantities stipulated in the Wheeling Agreements are generator’s contribution to the peak load, instead of the generation quantities.

Interrogatory:

- a) Please provide data showing the generator’s hourly output for the most recent 12 months.
- b) Please identify the dates and hours of Hydro One’s system peak demand during the same period.
- c) Please calculate the generator’s output as a percentage of its capacity during those peak hours.

Response:

- a) The requested information is included in Attachment 1 to this interrogatory, which has been filed confidentially with the OEB in accordance with the Practice Direction on Confidential Filings.
- b) Please see table below.

Hydro One Distribution’s Monthly System Peak Date and Time

Year	Month	Day	Hour
2024	September	█	█
2024	October	█	█
2024	November	█	█
2024	December	█	█
2025	January	█	█
2025	February	█	█
2025	March	█	█
2025	April	█	█
2025	May	█	█
2025	Jun	█	█
2025	July	█	█
2025	August	█	█

1 c) Tables below provide the requested information.

2
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 4

Swift Rapids GS: Generator Output as Percentage of its Capacity at Hydro One Distribution's System Peak Hours

Year	Month	Day	Hour	Generator Output as % of its Capacity
2024	September			
2024	October			
2024	November			
2024	December			
2025	January			
2025	February			
2025	March			
2025	April			
2025	May			
2025	Jun			
2025	July			
2025	August			

5
 6

Minden GS: Generator Output as Percentage of its Capacity at Hydro One Distribution's System Peak Hours

Year	Month	Day	Hour	Generator Output as % of its Capacity
2024	September			
2024	October			
2024	November			
2024	December			
2025	January			
2025	February			
2025	March			
2025	April			
2025	May			
2025	Jun			
2025	July			
2025	August			

OEB STAFF INTERROGATORY - 12

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Reference:

1. Exhibit A-4-8, Page 3, Footnote 3
2. HONI_Dx_A-04-05-01_HONI Consolidated DVA Continuity, Tab 2, Cell B36

Preamble:

Reference 1 states there were no DVA dispositions in 2021 rate year for former CPUC. However, Reference 2 shows a CPUC Account 1595 (2021) is ready for disposition.

Interrogatory:

- a) Please reconcile the difference between Reference 1 and Reference 2 as noted in the preamble.

Response:

- a) Hydro One clarifies that the “CPUC Account 1595 (2021)” rider contained in the HONI Consolidated DVA Continuity (Exhibit A-04-05-01) was mislabeled and should have been labelled as “CPUC Account 1595 (2022)”.

An updated HONI Consolidated DVA Continuity with this correction has been re-filed as Attachment 1 to this interrogatory to rectify the above discrepancy.

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OEB STAFF INTERROGATORY - 13

Reference:

1. HONI_Dx_A-04-05-01_HONI Consolidated DVA Continuity, Tab 2
2. HONI_Dx_A-04-05-03_HONI Distribution DVA Continuity, Tab 2
3. HONI_Dx_A-04-05-04 2026-IRM-Rate-Generator-Model_Orillia RZ
4. HONI_Dx_A-04-05-05 2026-IRM-Rate-Generator-Model_Peterborough RZ
5. HONI_Dx_A-04-05-06_Chapleau 2026 DVA Schedule

Preamble:

On September 11, 2025, the OEB published the 2025 Quarter 4 prescribed accounting interest rates applicable to the carrying charges of deferral, variance and construction work in progress (CWIP) accounts of natural gas utilities, electricity distributors and other rate-regulated entities.

Interrogatory:

- a) Please confirm that Continuity Schedule in each reference above reflects the Q4 2025 OEB-prescribed interest rate of 2.91%. If not, please update, as necessary.

Response:

- a) Confirmed. The Continuity Schedule in each reference above reflects the Q4 2025 OEB-prescribed interest rate of 2.91%. No updates pertaining to OEB-prescribed interest rates are required.

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1 **OEB STAFF INTERROGATORY - 14**

2
3 **Reference:**

4 IRM Rate Generator Model Orillia Rate Zone Tabs 1, 12, 13 and 14

5
6 **Preamble:**

7 On Tab 1 (Row 53) Hydro One for the Orillia Rate Zone has indicated its is partially
8 embedded within Hydro One Networks Inc. On Tabs 12, 13 and 14 there are no billing
9 details entered for the IESO sections. This indicates the Orillia Rate Zone is fully
10 embedded in Hydro One.

11
12 **Interrogatory:**

- 13 a) OEB staff has updated Tab 1 to fully embedded within Hydro One (see attached
14 updated Rate Generator). Please confirm this is correct.
- 15
16 b) If the Orillia Rate Zone is in fact only partially embedded within Hydro One, please
17 change Tab 1 back to partially embedded within Hydro One and update the IESO
18 billing details for Tabs 12, 13 and 14.

19
20 **Response:**

- 21 a) Confirmed. Orillia Rate Zone is fully embedded within Hydro One Networks Inc.
- 22
23 b) Not Applicable.

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OEB STAFF INTERROGATORY - 15

Reference:

1. IRM Rate Generator Model Orillia Rate Zone Tab 12
2. IRM Rate Generator Model Peterborough Rate Zone Tab 12

Preamble:

On Tab 12 (Columns E, I and M) Hydro has not filled out the rates, please see screenshot below.

Orillia Rate Zone

Hydro One	Network			Line Connection			Transformation Connection			Total Connection
Month	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Amount
January	52,938		\$ 179,882	52,938		\$ 42,588	52,938		\$ 106,902	\$ 149,491
February	50,541		\$ 171,738	50,541		\$ 40,660	50,541		\$ 102,062	\$ 142,722
March	46,084		\$ 156,594	46,084		\$ 37,075	46,084		\$ 93,062	\$ 130,137
April	38,975		\$ 132,437	38,975		\$ 31,355	38,975		\$ 78,706	\$ 110,061
May	47,315		\$ 160,775	47,315		\$ 38,065	47,315		\$ 95,547	\$ 133,612
June	51,566		\$ 175,222	51,566		\$ 41,485	51,566		\$ 104,133	\$ 145,618
July	58,367		\$ 199,331	58,367		\$ 46,956	58,367		\$ 117,866	\$ 164,822
August	57,355		\$ 194,891	57,355		\$ 46,142	57,355		\$ 115,822	\$ 161,964
September	46,803		\$ 159,035	46,803		\$ 37,653	46,803		\$ 94,513	\$ 132,166
October	44,596		\$ 151,538	44,596		\$ 35,878	44,596		\$ 90,058	\$ 125,936
November	47,887		\$ 162,721	47,887		\$ 38,525	47,887		\$ 96,704	\$ 135,229
December	53,298		\$ 181,106	53,298		\$ 42,878	53,298		\$ 107,629	\$ 160,507
Total	595,725	\$ 3,3980	\$ 2,024,271	595,724	\$ 0.8045	\$ 479,260	595,724	\$ 2.0194	\$ 1,203,005	\$ 1,682,265

Peterborough Rate Zone

IESO	Network			Line Connection			Transformation Connection			Total Connection
Month	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Amount
January	59,540		\$ 233,397	63,970		\$ 62,051	63,970		\$ 149,050	\$ 211,101
February	73,066		\$ 286,419	78,193		\$ 75,847	78,193		\$ 182,190	\$ 258,037
March	72,029		\$ 282,354	73,224		\$ 71,027	73,224		\$ 170,812	\$ 241,639
April	55,367		\$ 217,039	59,018		\$ 57,247	59,018		\$ 137,512	\$ 194,759
May	69,190		\$ 271,225	69,884		\$ 67,787	69,884		\$ 162,830	\$ 230,617
June	68,621		\$ 268,994	80,514		\$ 78,099	80,514		\$ 187,598	\$ 265,697
July	76,397		\$ 299,476	78,621		\$ 76,262	78,621		\$ 183,187	\$ 259,449
August	76,056		\$ 298,140	77,779		\$ 75,446	77,779		\$ 181,225	\$ 256,671
September	66,975		\$ 262,542	71,339		\$ 69,199	71,339		\$ 166,220	\$ 235,419
October	57,170		\$ 224,106	57,170		\$ 55,455	57,170		\$ 133,206	\$ 188,661
November	66,666		\$ 261,331	66,666		\$ 64,666	66,666		\$ 155,332	\$ 219,998
December	70,422		\$ 276,053	70,422		\$ 68,309	70,422		\$ 164,083	\$ 232,392
Total	811,499	\$ 3.92	\$ 3,181,076	846,800	\$ 0.97	\$ 821,395	846,800	\$ 2.33	\$ 1,973,045	\$ 2,794,440

Interrogatory:

Please fill out the rates on Tab 12 (Columns E, I and M) for both the Orillia and Peterborough Rate Zones.

Response:

Hydro One has populated the requested information on Tab 12 of the Orillia and Peterborough RZ Rate Generator Models. The updated Rate Generator Models are provided as Attachment 1 (Orillia RZ) and Attachment 2 (Peterborough RZ) to this interrogatory response.

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Tab 1

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- 1 Hydro One notes that the updates in Tab 12 do not impact the final RTSRs calculated in
- 2 Tab 15 of the Orillia and Peterborough RZ's Rate Generator Models.

1 **OEB STAFF INTERROGATORY - 16**

2
3 **Reference:**

4 IRM Rate Generator Model Peterborough Rate Zone Tab 11 and 12

5
6 **Preamble:**

7 On Tab 11, the 2024 January to December Network Service Rate is reported as \$4.9103.
8 On Tab 12, the January to December Network Rate is reported as \$3.3980. On Tab 11,
9 the 2024 January to December Line Connection Service Rate is reported as \$0.6537. On
10 Tab 12, the January to December Connection Service Rate is reported as \$0.8045. As
11 well, on Tab 11, the 2024 January to December Transformation Line Connection Service
12 Rate is reported as \$3.3041. On Tab 12, the January to December Connection Service
13 Rate is reported as \$2.0194.

14
15
16 **Interrogatory:**

17 Please explain the discrepancies and update the Rate Generator Model Tab 12 as
18 needed.

19
20 **Response:**

21 As described in Exhibit A-04-04, section 3, pages 3 and 4:

22
23 Following OPDC and PDI's integration with Hydro One, Hydro One's
24 transmission charges have been settled on an overall basis, and
25 consequently separate transmission demand details by rate zone are no
26 longer available. In this Application, Hydro One uses the same OEB
27 approved methodology to derive the proposed 2026 RTSRs, as in
28 previous IRM applications and most recently in the 2025 IRM application
29 for the Orillia and Peterborough RZs.¹ As the 2020 rate year was the
30 last year before the integration, the approved methodology to establish
31 transmission charges applies the 2020 IESO billing information and
32 billing quantities to the currently effective UTRs and Hydro One ST rates
33 and losses. This approach will continue annually until all customers are
34 fully transitioned to Hydro One's rate structure. The IRM Model allocates
35 the resulting forecast transmission charges to the rate classes in
36 proportion to the billed RTSR amount, which is based on current
37 transmission rates and charge determinants from the 2020 RRR filing.

38
39 As such, Tab 12 uses billing quantities and billed amounts from Orillia and Peterborough
40 RZ's last filed RTSR Workform in their 2020 IRM applications. This results in calculated

¹ This approach was first approved by the OEB in the EB-2016-0082 Decision on 2017 Rates for Norfolk Power, Haldimand County and Woodstock dated December 21, 2016, p. 6.

- 1 UTRs and Hydro One ST rates (in Tab 12) being different from the inputs for the historical
- 2 years (in Tab 11).
- 3
- 4 This approach was previously reviewed and approved by the OEB in Orillia and
- 5 Peterborough RZ's IRM applications for 2022 (EB-2021-0050), 2023 (EB-2022-0040),
- 6 2024 (EB-2023-0059) and 2025 (EB-2024-0033).

OEB STAFF INTERROGATORY - 17

Reference:

1. HONI_Dx_A-08-01-02 Rate Rider Derivation for Group 1 DVAs - Chapleau_20250829
2. Chapleau 2024-IRM-Rate-Generator-Model_20230321, Continuity Schedule

Interrogatory:

- a) Column P, Column U, Column Z, and Column AE in Reference 1 are not completed, please update the Continuity Schedule.
- b) Opening Amounts as Jan-23 in Column N and Column S in Reference 1 do not match with Closing Balances as of December 31, 2022 in Column BG and Column BL. Please reconcile the difference

Response:

- a) Please see updated Rate Rider Derivation for Group 1 DVAs - Chapleau (Exhibit A-08-01-02) provided as Attachment 1 of this interrogatory. The associated DVA Continuity Schedule for Chapleau (as originally provided in Exhibit A-04-05-06) has also been updated in Attachment 2 of this interrogatory. Note that there is no change in the ending balances as at December 31, 2024 and thus the rate riders in Exhibit A-08-01-02 attachment remain unchanged from the as-filed version.
- b) In the originally filed DVA Continuity Schedule for Chapleau (Reference 1 - Exhibit A-08-01-02), the ending balance in 2022 included OEB approved dispositions in 2023, therefore the opening 2023 balances (in Reference 1) did not exactly match the 2022 closing balances disclosed in Chapleau's 2024 IRM (in Reference 2). As a result of the updates in part a), this discrepancy has been resolved.

Note that there is no change in the ending balances as at December 31, 2024 as this was simply a presentation difference in the references.

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1 **OEB STAFF INTERROGATORY - 18**

2
3 **Reference:**

4 Exhibit A-4-6, Pages 2-4

5
6 **Preamble:**

7 Hydro One stated that as a result of its Internal Review, Note 5, Item 10 reconciling item
8 on 2023 GA Tab – Commodity Accounts Analysis Workform, changed from a previously
9 reported credit reconciling item of \$27,492,434 to a revised credit reconciling item of
10 \$26,319,169.

11
12 Hydro One further stated that without limiting the generality of the disagreement on
13 Account 1589, there was no agreement between Hydro One and OEB staff on Note 5,
14 Reconciling Item 10 in the Commodity Accounts Workform (i.e. \$26 million credit
15 reconciling item).

16
17 Hydro One agreed to file, on a best efforts basis, a modified Commodity Accounts Analysis
18 Workform (customized to Hydro One's circumstances) during the 2026 proceeding to
19 support the reasonability of the Account 1589 balance. Hydro One further noted that there
20 is no agreement at this time that the modified Commodity Accounts Analysis Workform will
21 establish reasonability.

22
23 **Interrogatory:**

24 a) Please file Hydro One's modified Commodity Accounts Analysis Workform
25 (customized to Hydro One's circumstances), related to both Accounts 1588 and 1589.
26 Please identify and explain additional reconciling items or principal adjustments with
27 specific drivers (e.g., any billing adjustments, IESO settlement adjustments, or other
28 adjustments in breaking down true-up amounts further).

29
30 b) Please explain how Hydro One's modified Commodity Accounts Analysis Workform
31 differs from the OEB's templated workform posted on the OEB's website, related to
32 both Accounts 1588 and 1589.

33
34 **Response:**

35 a) Hydro One committed, on a best-efforts basis and at OEB staff's request, to file a
36 modified Commodity Accounts Analysis Workform during the 2026 proceeding to
37 support the reasonability of the Account 1589 balance. A prerequisite to preparing a
38 modified Commodity Accounts Analysis Workform is the availability of calendarized
39 monthly billed loss-adjusted consumption and billed Global Adjustment (GA)
40 revenues.

1 In the OEB's Decision in EB-2023-0030, the OEB directed Hydro One to present a
2 plan in its next Custom IR application to fully adopt the Accounting Guidance on a
3 prospective basis, including the costs and implications of doing so. Data
4 calendarization is a key component of this plan, which is currently under development.

5
6 The OEB's direction in EB-2023-0030 was to adopt the Accounting Guidance on a
7 prospective basis. OEB staff's expectation to reproduce the 2023 and 2024 GA
8 reasonability result using calendarized data within this context will be introducing a
9 retroactive application of the guidance. Any reconciliation of prior years should be
10 considered within the context of the prospective implementation framework directed
11 by the OEB.

12
13 Hydro One recently reviewed and determined that there is no readily available
14 approach or IT solution to produce the required calendarized data. Until the full
15 calendarization solution is developed, Hydro One is unable to submit the modified
16 Workform. This limitation does not impact disposition of the Account 1589 balance, as
17 the reconciling item relates to the expected GA revenue and is not a principal
18 adjustment.

19
20 b) Please refer to the response in part a) above.

OEB STAFF INTERROGATORY - 19

Reference:

1. Ref.1: Excel HONI_Dx_A-04-06_03_2026_Commodity_Accounts_Analysis_Workform_2.0_20250829, Tab GA 2024
2. Exhibit A-4-6, Attachment 1, Page 15
3. Exhibit A-4-6, Page 5

Preamble:

In Tab GA 2024, under Note 5, Hydro One has provided the following explanations in Column B, with a more detailed explanation in Column D.

- “LDC Customers adjustment on the Rate used:” debit of \$4,428,046
- “Adjustment to Note 4 table, because it does not reflect HONI Dx GA unbilled calculation which is done on each customer account:” credit of \$11,223,509

In Tab GA 2024, under Note 5, Hydro One has provided a reconciling item of a debit of \$1,173,474 relating to “Retail billed kWh at Weighted Average GA billed Rate adjustment.”

In Tab Account 1588, Hydro One has quantified a debit amount of \$9,359,555 related to “Embedded Generation Settlement true-up based on actual - current year”.

“Table 4: Revised supporting documentation for Note 5, Reconciling Item 10” in the Internal Review Report described a “plug” reconciling item related to 2023 balances of a credit of \$26.3 million.

Hydro One stated that in 2023 and 2024, there are credit reconciling items of \$26,319,169 (Note 5, Item 10) and \$11,223,509 (Note 5, Item 8) in each respective year, which are specific Hydro One adjustments to the Commodity Analysis Workform Note 4 table. Hydro One stated that this specific reconciling item is required because the Commodity Analysis Workform Note 4 table does not reflect Hydro One’s GA unbilled calculation which is done on each customer account. Hydro One noted that this item is in the general ledger, but excluded for the purpose of comparison to the Note 4 table.

Interrogatory:

- a) Please explain (also with supporting tables) these above two adjustments noted in Tab GA 2024 (debit of \$4,428,046 and credit of \$11,223,509) in more detail, as they appear to be quantifying and describing the same thing.

- 1 b) Please explain whether the reconciling item of a debit of \$1,173,474 in Tab GA 2024
2 relating to “Retail billed kWh at Weighted Average GA billed Rate adjustment” used
3 the same methodology to generate this number as in Tab GA 2023. Please provide a
4 supporting table.
5
- 6 c) Please explain the Tab Account 1588 adjustment of a debit amount of \$9,359,555 in
7 2024 related to “Embedded Generation Settlement true-up based on actual - current
8 year”. Please provide a supporting table.
9
- 10 d) Please explain why there were no years prior to 2024 that captured an Account 1588
11 adjustment related to “Embedded Generation Settlement true-up based on actual.”
12
- 13 e) Please confirm that in Tab GA 2024, there is a reconciling item amount of a credit of
14 \$11,223,509 similar to the credit reconciling item of \$26,319,169 for Account 1589 in
15 Tab GA 2023. Please also provide a similar table for related 2024 amounts, as per
16 “Table 4: Revised supporting documentation for Note 5, Reconciling Item 10” in the
17 Internal Review Report for related 2023 amounts, and supporting explanations. If the
18 number in Tab GA 2024 is not a credit of \$11,223,509, please explain.
19

20 **Response:**

- 21 a) Please find below additional information on the requested adjustments noted in Tab
22 GA 2024:
- 23 • “LDC Customers adjustment on the Rate used:” debit of \$4,428,046 (Reconciling
24 Item 6)
 - 25 • “Adjustment to Note 4 table, because it does not reflect HONI Dx GA unbilled
26 calculation which is done on each customer account:” credit of \$11,223,509
27 (Reconciling Item 8)
- 28

29 These two adjustments are not describing the same thing, as the first adjustment
30 entitled “LDC Customers adjustment on the Rate used” adjustment reflects a true-up
31 of billed amounts for LDC class B customers at actual GA rate, rather than 1st
32 estimate. The second adjustment entitled “Adjustment to Note 4 table, because it does
33 not reflect HONI Dx GA unbilled calculation which is done on each customer account”
34 is a manual adjustment to match the Note 4 calculated expected Class B GA Revenue
35 to reflect actual amounts from Hydro One's billing system.
36

37 **“LDC Customers adjustment on the Rate used:” Debit Adjustment of \$4,428,046**

38
39 This is the same adjustment as Reconciling Item 8 of Tab GA 2023 of the Workform.

1 In 2024, there is a debit of \$4,428,046 to adjust for LDC Customers' billed GA used
 2 for actual billing. The detailed calculation is shown below.
 3

	Class B LDC Current Month Including Loss Factor Billed Consumption (kWh)	Deduct Previous Month Unbilled Loss Adjusted Consumption (kWh)	Add Current Month Unbilled Loss Adjusted Consumption (kWh)	Class B LDC Including Loss Adjusted Consumption, Adjusted for Unbilled (kWh)	GA Rate Billed (\$/kWh) assumed in Note 4: 1st GA	GA Rate used Billed (\$/kWh) by Hydro One in : Actual GA	GA Estimated Revenue based on 1st GA in Note 4	GA revenue Estimated Based on Actual GA	Difference
	F	G	H	I = F-G+H	J	L	K = I*J	M = I*L	M-K
2024-Jan	134,674,085	171,669,604	183,383,547	146,388,028	0.05413	0.04588	7,923,983.96	6,716,282.73	(1,207,701.23)
2024-Feb	166,821,057	183,383,547	151,412,801	134,850,312	0.08498	0.06632	11,459,579.50	8,943,272.68	(2,516,306.82)
2024-Mar	138,090,181	151,412,801	139,392,494	126,069,874	0.08366	0.08171	10,547,005.63	10,301,169.38	(245,836.25)
2024-Apr	114,927,762	139,392,494	130,672,281	106,207,550	0.08498	0.07427	9,025,517.57	7,888,034.71	(1,137,482.86)
2024-May	116,362,696	130,672,281	106,720,594	92,411,009	0.04588	0.07763	4,239,817.11	7,173,866.66	2,934,049.55
2024-Jun	101,546,034	106,720,594	112,812,481	107,637,920	0.04588	0.07840	4,938,427.77	8,438,812.93	3,500,385.16
2024-Jul	111,502,285	112,812,481	124,047,357	122,737,162	0.04588	0.06371	5,631,181.00	7,819,584.60	2,188,403.60
2024-Aug	121,479,808	124,047,357	122,038,740	119,471,191	0.05552	0.06323	6,633,040.53	7,554,163.42	921,122.88
2024-Sep	119,505,849	122,038,740	110,868,269	108,335,378	0.06750	0.07928	7,312,638.05	8,588,828.81	1,276,190.76
2024-Oct	105,728,739	110,868,269	115,681,602	110,542,071	0.08171	0.07484	9,032,392.64	8,272,968.61	(759,424.03)
2024-Nov	107,005,109	115,681,602	178,393,283	169,716,791	0.07680	0.08904	13,034,249.57	15,111,583.09	2,077,333.52
2024-Dec	138,636,758	178,393,283	188,396,628	148,640,102	0.07928	0.06177	11,784,187.32	9,181,499.13	(2,602,688.19)
				1,493,007,389			101,562,020.65	105,990,066.74	4,428,046.09

4
 5
 6 "Adjustment to Note 4 table, because it does not reflect HONI Dx GA unbilled
 7 calculation which is done on each customer account:" credit of \$11,223,509
 8

9 This is the same adjustment as Reconciling Item 10 on Tab GA 2023 of the Workform.

10
 11 This adjustment was described as a "plug" reconciling item related to 2023 balances
 12 of a credit of \$26.3 million.¹ Using the same methodology as last year, there is a
 13 quantified amount of \$11,223,509 (for 2024) calculated from a two-step process.

¹ See Exhibit A-04-06, Internal Review Report, Attachment 1, Table 4: Revised supporting documentation for Note 5, Reconciling Item 10

1 Step 1: Analysis of Expected GA Revenue Accrued on GA Analysis Workform by
 2 adjusting LDC to the actual GA rate.

GA Workform Note 4 and Note 5 GA Revenue Estimation	Non RPP Class B Non LDC					GA Rate Billed (\$/kWh) 1st Estimate	\$ Consumption at GA Rate Billed	Non RPP Class B LDC \$ Consumption at GA Rate Billed	Total Non RPP Class B \$ Consumption at GA Rate Billed
	Non-RPP Class B non LDC Including Loss Factor Billed Consumption (kWh)	Deduct Previous Month Unbilled Loss Adjusted Consumption (kWh)	Add Current Month Unbilled Loss Adjusted Consumption (kWh)	Non-RPP Class B Non LDC Including Loss Adjusted Consumption, Adjusted for Unbilled (kWh)					
	A	B	C	D=A-B+C	E				
January	509,674,081	590,614,370	591,539,033	510,598,744	0.05413	27,638,710.02	6,716,282.73	34,354,992.75	
February	496,390,244	591,539,033	563,343,902	468,195,112	0.08498	39,787,220.65	8,943,272.68	48,730,493.33	
March	465,765,388	563,343,902	579,188,880	481,610,366	0.08366	40,291,523.23	10,301,169.38	50,592,692.61	
April	486,990,841	579,188,880	520,542,582	428,344,543	0.08498	36,400,719.25	7,888,034.71	44,288,753.97	
May	445,949,700	520,542,582	498,520,809	423,927,927	0.04588	19,449,813.29	7,173,866.66	26,623,679.96	
June	419,106,981	498,520,809	530,917,424	451,503,597	0.04588	20,714,985.02	8,438,812.93	29,153,797.95	
July	438,102,221	530,917,424	525,087,447	432,272,244	0.04588	19,832,650.55	7,819,584.60	27,652,235.15	
August	457,625,500	525,087,447	537,358,112	469,896,164	0.05552	26,088,635.04	7,554,163.42	33,642,798.45	
September	445,455,225	537,358,112	541,505,379	449,602,492	0.06750	30,348,168.20	8,588,828.81	38,936,997.01	
October	480,894,982	541,505,379	508,086,855	447,476,459	0.08171	36,563,301.43	8,272,968.61	44,836,270.05	
November	417,046,305	508,086,855	552,247,319	461,206,769	0.07680	35,420,679.84	15,111,583.09	50,532,262.93	
December	431,544,929	552,247,319	612,478,716	491,776,326	0.07928	38,988,027.12	9,181,499.13	48,169,526.24	
Total	5,494,546,397	6,538,952,112	6,560,816,457	5,516,410,743		371,524,433.65	105,990,066.74	477,514,500.39	

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4

5 Step 2: Revenue Gap Reconciliation and Calculation

\$ Consumption at GA Rate Billed (Note 4 Cell H53)	473,141,854.45
Item 6: Reconciling Item True-up: LDC Customer Adj on the rate used	4,428,046.09
Item 2a: Remove prior year end unbilled to billed revenue differences	(3,579,201.01)
Item 2b: Add current year end unbilled to billed revenue differences	4,820,293.41
GA Workform's Revenue Estimate	478,810,992.94
Hydro One GL Records for GA Revenue	467,532,083.76
Difference	(11,278,909.18)
Rounding Difference (using 5 decimal vs 4 decimal on GA price)	55,400.18
	(11,223,509.00)

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9

Note, reference to Note 4 Cell H53 above refers to the 2026 Commodity Accounts Workform (Exhibit A-04-06-03)

10 b) Confirmed. The reconciling item of a debit of \$1,173,474 in Tab GA 2024 relating to
 11 "Retail billed kWh at Weighted Average GA billed Rate adjustment" used the same
 12 methodology to generate the number in Tab GA 2023.

13
14

Please see supporting table below:

15

Presented on HONI IR 13 EB-2023-0030		2021	2022	2023	2024
"Annual Non-RPP Class B Wholesale kWh" (cell G57)	a	6,736,692,587	6,950,838,205	6,879,702,611	6,887,333,170
"Weighted Average GA Actual Rate Paid (\$/kWh)" (cell J57)	b	0.07675	0.05290	0.07475	0.07085
"\$ Consumption at Actual Rate Paid" (cell J53)	c	525,557,401.91	369,876,263.35	525,326,047.09	497,723,204.21
The revised Expected GA Volume Variance (\$)	d=axb-c	(8,510,593.74)	(2,165,945.40)	(11,094,771.57)	(9,777,929.44)
"Annual Non-RPP Class B Wholesale kWh" (cell G57)	a	6,736,692,587	6,950,838,205	6,879,702,611	6,887,333,170
"Annual Non-RPP Class B Retail billed kWh" (cell H57)	e	6,663,013,081	7,024,930,465	7,059,477,140	7,009,418,132
"Weighted Average GA Actual Rate Paid (\$/kWh)" (cell J57)	b	0.07675	0.05290	0.07475	0.07085
Note 4 Calculated Expected GA Volume Variance (\$ (cell K57)	g=(a-e)xb	5,654,963.89	(3,919,597.57)	(13,437,453.74)	(8,649,324.64)
Retail billed kWh at Weighted Average GA Actual Rate adjustment	g-d	14,165,557.63	(1,753,652.17)	(2,342,682.17)	1,128,604.79
Rounding difference (using 5 decimal of GA price vs. 4 decimal)					44,869.21
					1,173,474.00

16

1 c) Please see additional information below on Tab Account 1588 adjustment of debit
 2 \$9,359,555 in 2024 related to “Embedded Generation Settlement true-up based on
 3 actual - current year”.

- 4
- 5 • Hydro One declares the estimated Generation Settlement amount in December
 - 6 2024 based on estimated purchased volumes and estimated HOEP rate for
 - 7 transaction month of December 2024.
 - 8 • Hydro One then declares the true-up of Generation Settlement amount in January
 - 9 2025 based on the actual invoiced purchased volume and actual HOEP rate for
 - 10 transaction month of December 2024.

11

12 The detailed calculation of this Embedded Generation Settlement true-up is shown
 13 below.

Programs	Dec 2024 Estimate	Dec 2024 Actual	Dec 2024 True-up
	Declared to IESO in Dec 2024		Declared to IESO in Jan 2025
RESOP	(13,840,842.79)	(12,245,413.88)	1,595,428.91
FIT	(32,488,827.95)	(26,378,297.76)	6,110,530.19
microFIT	(4,712,272.44)	(3,022,486.94)	1,689,785.50
HCI	(2,028,602.84)	(2,162,977.52)	(134,374.68)
SHP	(23,482.42)	(22,736.04)	746.38
Procurement	(485,081.20)	(387,642.78)	97,438.42
Total	(53,579,109.64)	(44,219,554.92)	9,359,554.72
+: Payable to IESO			
-: Receivable from IESO			

14

15

16 d) The adjustment related to “Embedded Generation Settlement true-up based on actual”
 17 was not included in years prior to 2024 because the resulting variances were within
 18 the ±1% materiality threshold established in the GA Analysis Workform Instructions.
 19 As such, there was no requirement to include additional reconciling items for those
 20 years.

21 For consistency and to avoid introducing offsetting entries, Hydro One did not include
 22 the 2023 embedded generation true-up in the 2024 balance. Including it would have
 23 resulted in an in-and-out adjustment across two years, with no net impact on the
 24 disposition amount.

25

26 e) Confirmed. Please see the supporting table in part a) above.

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OEB STAFF INTERROGATORY - 20

Reference:

1. Exhibit A-4-6, Page 5
2. Exhibit A-4-6, Attachment 1h, Page 6
3. Exhibit A-4-6, Attachment 1, Page 7
4. Exhibit A-4-6, Attachment 1, Page 10
5. Exhibit A-4-6, Attachment 1, Page 15

Preamble:

Hydro One stated that any reconciling items on its Commodity Accounts Analysis Workform recorded as a debit reflected under-recovery of GA revenue (or regulatory asset) relative to the Workform's expectations. A credit resulted in an over-recovery of GA revenue (or regulatory liability) relative to the Workform's expectations.

However, this approach taken (as noted in the first paragraph of the above preamble) differs from the approach taken in other areas of Hydro One's application. For example Hydro One stated in its "Responses to Follow-Up Questions" that its "approach used in Issue 1A involved offsetting a higher GL credit with a lower Workform credit to derive a net debit (regulatory asset)..." Other approaches similar to Issue 1A's approach are shown in tables of the Internal Review report (and differ from what is noted in the first paragraph of the above preamble):

- Table 1: Supporting documentation for Note 5, Reconciling Item 8
- Table 2: Supporting documentation for Note 5, Reconciling Item 9
- Table 4: Revised supporting documentation for Note 5, Reconciling Item 10

Interrogatory:

- a) Please explain whether Hydro One meant the opposite of what is noted in the first paragraph of the above preamble. Specifically, that
 - i. A debit represents over-recovery of GA revenue (or regulatory asset) and not under-recovery, relative to the Workform's expectation. This is because an over-recovery of GA revenue would need to be debited in the Workform to reduce the higher GA revenue recorded in the general ledger, relative to the Workform's expectations.
 - ii. A credit represents an under-recovery of GA revenue (or regulatory liability) and not over-recovery, relative to the Workform's expectations. This is because an under-recovery of GA revenue would need to be credited in the Workform to increase the lower GA revenue recorded in the general ledger, relative to the Workform's expectations.

- 1 **Response:**
2 a) The above-referenced description in Exhibit A-04-06, page 5 contained a typo, and
3 should have meant the opposite:
4
5 i. A debit adjustment to the RSVA balance represents an over-recovery of GA
6 revenue (or regulatory asset) and not under-recovery, relative to the Workform's
7 expectation.
8
9 ii. A credit adjustment to the RSVA balance represents an under-recovery of GA
10 revenue (or regulatory liability) and not over-recovery, relative to the Workform's
11 expectations.

1 **OEB STAFF INTERROGATORY - 21**

2
3 **Reference:**

- 4 1. Exhibit A-5-1, Page 1-5
5 2. EB-2025-0159, Hydro One Networks Transmission, Decision and Order, October 7,
6 2025, pages 6-7
7

8 **Preamble:**

9 Hydro One provided "Table 1 - Hydro One Distribution (2021- 2024 ESM) (\$M)" in its
10 current proceeding evidence, showing the calculations it used to calculate the 2021
11 through 2024 ESM balances. Hydro One is requesting disposition of a total credit balance
12 of \$66.8 million, including 2021 through 2024 principal amounts, and carrying charges to
13 December 31, 2025.
14

15 Hydro One Distribution is also requesting to dispose of a \$2.2 million credit amount that
16 was identified in 2021 and should have been presented as part of the 2020 disposed ESM
17 balance.
18

19 Hydro One stated that the 2020 ESM balance was last disposed on a final basis in the
20 2023-2027 Custom IR application. Hydro One subsequently identified the need for a one-
21 time inclusion of a credit of \$2.2 million (in 2021) to reverse an over-depreciation on
22 distribution fixed assets (in 2020), which understated earnings in 2020.
23

24 Hydro One also stated that as this post-audit adjustment was not reflected in the audited
25 2020 DVA balances after the 2023-2027 Custom IR Application was filed, the ESM
26 balance proposed for disposition at the time of settlement was a credit balance of \$14.9
27 million (aligned to 2020 audited balances). The ESM balance disposed should have been
28 presented as \$17.1 million as of 2020 to include this additional \$2.2 million credit amount.
29

30 The OEB approved an ESM balance in the Hydro One Networks Transmission Decision
31 and Order, October 7, 2025, for its 2026 revenue requirement.
32

33 **Interrogatory:**

- 34 a) Please explain whether any updates to the requested ESM credit balance of \$66.8
35 million need to be made as a result of any specific drivers included in the OEB-
36 approved ESM balance for Hydro One Networks Transmission decision and order
37 issued on October 7, 2025.

- 1 **Response:**
- 2 a) No updates are required to the ESM credit balance of \$66.8M as a result of specific
- 3 drivers included in the OEB-approved ESM balance for Hydro One Transmission on
- 4 October 7, 2025. All applicable adjustments from Hydro One Transmission ESM
- 5 calculations have been factored in the Hydro One Distribution ESM calculations.

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OEB STAFF INTERROGATORY - 22

Reference:

1. Exhibit A-5-1, Page 4
2. EB-2021-0110, Decision and Order, November 29, 2022, Attachment 2, Schedule 1.8, Page 1, October 24, 2022
3. OEB Letter, Adjustments to Correct for Errors in Electricity Distributor “Pass-Through” Variance Accounts After Disposition, October 31, 2019

Preamble:

In its pre-filed evidence, Hydro One stated the following:

As a result of recomputing accelerated CCA calculated using actual additions as agreed to in the EB-2021-0110 (Decision on Settlement Proposal and Order on Rates, Revenue Requirements and Charge Determinants page 46), there was a reduction in the associated regulatory tax account liability, resulting in additional earnings. This resulted in more sharing from 2018 to 2021, resulting in an additional ESM liability of \$4.5M being recorded in 2022. This \$4.5M was appropriately excluded from the 2022 regulated net income calculation. For simplicity, the \$4.5M is presented in just the 2021 year as Hydro One Distribution was in a sharing position from 2018-2021.

Interrogatory:

- a) Please explain and quantify whether there is an impact of the \$4.5 million tax reduction on the Account 1592 balance disposed in Hydro One’s JRAP proceeding for 2023-2027 rates, given that it relates to 2018 to 2021 balances.
- b) If yes, please also describe how Hydro One has satisfied the OEB’s concerns noted in the OEB’s October 31, 2019 letter, regarding adjustments to correct for errors after disposition, including the four factors that will be considered in making such a determination on a case-by-case basis.
- c) If no, please explain.

Response:

- a) Hydro One would like to clarify that there are no retroactivity impacts from the \$4.5M adjustment entry on the Account 1592 balance disposed in the 2023-2027 Custom IR proceeding. To provide greater certainty, the \$4.5M tax reduction (resulting in additional ESM liability) is the associated impact to Account 2435 (Earnings Sharing Mechanism Deferral Account) in the 2021 year, and does not have any impact on the Account 1592 disposed balance.

- 1 b) Not Applicable.
- 2
- 3 c) There is no impact on the Account 1592 balance disposed in Hydro One's 2023-2027
4 Custom IR proceeding because the recomputed accelerated CCA calculated using
5 actual additions were already captured in the calculation of the 1592 balance from
6 2018 to 2020 as part of OEB approved dispositions (from the 2023-2025 period).
- 7
- 8 Subsequently, for the years 2021 and 2022, the recomputed accelerated CCA
9 adjustments were captured in the calculation of the Account 1592 balance for
10 disposition in Hydro One's next rebasing application.

1 **OEB STAFF INTERROGATORY - 23**

2
3 **Reference:**

- 4 1. Exhibit A-5-1, Page 2 & 3
5 2. Excel HONI A-05-01_01_Gr 2 Dx DVA_ESM Continuity_20250911_v2
6

7 **Preamble:**

8 Hydro One stated that the total ESM principal requested for disposition is \$59.1 million
9 (\$56.9 million + \$2.2 million), which agrees to the closing December 31, 2024 principal
10 balance per its Excel spreadsheet (DVA Continuity for ESM balance).
11

12 However, "Table 1 - Hydro One Distribution (2021- 2024 ESM) (\$M)" sums to a principal
13 balance of a credit of \$56.9 million and appears to already include the \$2.2 million credit
14 adjustment when adding the amounts in rows R, S, and T together. The sum of rows R, S,
15 and T is a credit of approximately \$2.4 million (which is slightly different than the above
16 referenced \$2.2 million credit).
17

18 OEB staff also notes that the Excel spreadsheet DVA ESM continuity schedule has a
19 difference of a credit of \$3,550,979 when comparing the December 31, 2024 balance in
20 the DVA continuity schedule to the RRR 2.1.7 balance of a credit of \$68,453,985.
21

22 **Interrogatory:**

- 23 a) Please explain whether the ESM principal balance being requested for disposition in
24 this proceeding is a credit of \$59.1 million or a credit of \$56.9 million.
25
26 b) Please explain the difference of a credit of \$3,550,979 when comparing the December
27 31, 2024 balance in the ESM DVA continuity schedule to the RRR 2.1.7 balance of a
28 credit of \$68,453,985. Please also reconcile this difference to the \$2.2 million principal
29 credit adjustment to the ESM balance.
30

31 **Response:**

- 32 a) The ESM principal balance as at December 31, 2024 is a credit of \$59.1M.¹ This is
33 the sum of the credit amount of \$56.9M (see Exhibit A-05-01, Table 1) and credit
34 adjustment of \$2.2M (see Exhibit A-05-01, Section 1.2).
35

36 For greater clarity, the total ESM balance requested for disposition is a credit of
37 \$66.7M, inclusive of projected interest to December 31, 2025.²

¹ Exhibit A-05-01, Section 1.1, p. 2

² HONI A-05-01_01 Gr Dx DVA_ESM Continuity, dated Sept 11, 2025 v2

1 A correction is also required to the preamble to this interrogatory. In Exhibit A-05-01,
2 Table 1, the adjustments outlined in rows R, S, and T relate only to the 2021 and 2022
3 year, and therefore will not equal the \$2.2M credit adjustment affecting the 2020
4 ending balance. For more details on the adjustments in rows R, S, and T, please refer
5 to footnotes 2A, 2B, 2C, 3B and 3C. These amounts are independent of the \$2.2M
6 credit, as explained in Exhibit A-05-01, Section 1.2.

7
8 b) As explained in Tab "Appendix A" of the ESM DVA Continuity (Exhibit A-05-01-01),
9 there is a difference of \$3.6M between the December 31, 2024 on the ESM Continuity
10 and RRR 2.1.7 because there was a subsequent adjustment to the 2024 calculation
11 after the standalone Hydro One Distribution financial statements and the RRR/ROE
12 submission were finalized.

13
14 This debit adjustment of \$3.6M relates to 2024 costs that were recorded in the
15 accounting system in 2025, and is reflected as part of the 2024 ESM balance for
16 correct presentation in the ESM DVA Continuity. Therefore, the sum of the RRR 2.1.7
17 credit balance (of \$68.5M) and debit adjustment (of \$3.6M) equals the ESM balance
18 of credit \$64.9M as of December 31, 2024, as per the ESM DVA Continuity (cell AV8
19 and cell BA8).

OEB STAFF INTERROGATORY - 24

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Reference:

1. HONI_Dx_A-04-05-04 2026-IRM-Rate-Generator-Model_Orillia RZ
2. HONI_Dx_A-04-05-05 2026-IRM-Rate-Generator-Model_Peterborough RZ

Preamble:

OEB staff has updated the following Uniform Transmission Rates and Hydro One Sub-Transmission Rates in Tab 18 for the Orillia and Peterborough RZ's Rate Generator Model:

Uniform Transmission Rates		Unit	2024 Jan to Jun		2024 Jul to Dec		2025 Jan to Jun		2025 Jul to Dec		2026
Rate Description			Rate		Rate		Rate		Rate		Rate
Network Service Rate	kW	\$	5.78	\$	6.12	\$	6.37	\$	6.37	\$	6.42
Line Connection Service Rate	kW	\$	0.95	\$	0.95	\$	1.00	\$	1.00	\$	1.02
Transformation Connection Service Rate	kW	\$	3.21	\$	3.21	\$	3.39	\$	3.39	\$	3.47

Hydro One Sub-Transmission Rates		Unit	2024		2025		2026
Rate Description			Rate		Rate		Rate
Network Service Rate	kW	\$		4.9103	\$	5.3280	\$ 5.4282
Line Connection Service Rate	kW	\$		0.6537	\$	0.6882	\$ 0.6896
Transformation Connection Service Rate	kW	\$		3.3041	\$	3.4894	\$ 3.4965
Both Line and Transformation Connection Service Rate	kW	\$		3.9578	\$	4.1776	\$ 4.1861

Interrogatory:

Please confirm the accuracy of these updates in the Rate Generator Model.

Response:

Hydro One confirms that the updated 2026 Uniform Transmission Rates and Hydro One Sub-Transmission Rates in Tab 11 of the Rate Generator models are accurate.

Filed: 2025-10-31
EB-2025-0030
Exhibit I
Tab 1
Schedule 24
Page 2 of 2

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CONSUMERS COUNCIL OF CANADA INTERROGATORY - 01

Reference:

Exhibit A-6-1, Page 1

Preamble:

Hydro One is requesting recovery of \$64.3 million in the Hydro One Distribution RZ, \$1.1 million in the Orillia RZ and \$4 million in the Peterborough RZ.

Interrogatory:

- a) What are the monthly bill impacts of the Z-factor rate riders only, for all customer classes under Hydro One's proposed recovery periods?
- b) What would they be if the recovery period for all three zones was one year?

Response:

- a) The monthly bill impacts of the Z-factor rate riders for Hydro One Distribution, Peterborough RZ and Orillia RZ are provided in Tables 23, 24, and 25, respectively, of Exhibit A-06-01.
- b) Please see Hydro One's response to Interrogatory I-01-07, part b) for the bill impacts for Peterborough and Orillia RZs.

Hydro One Distribution's bill impacts are provided in Table 1 below.

Table 1: Hydro One Distribution Z-Factor Bill Impacts with 1-Year Recovery Period

Rate Class	Monthly Consumption (kWh)	Monthly Peak (kW)	Sub-Total						Total	
			A (Distribution Excl Pass-Through)		B (Distribution Incl Pass-Through)		C (Total Distribution and RTSRs)		Total Bill	
			\$	%	\$	%	\$	%	\$	%
UR	750		\$1.44	3.5%	\$1.44	3.3%	\$1.44	2.3%	\$1.44	1.0%
R1 (without DRP)	750		\$2.46	3.5%	\$2.46	3.3%	\$2.46	2.7%	\$2.46	1.4%
R2 (without DRP)	750		\$4.99	5.4%	\$4.99	5.1%	\$4.99	4.4%	\$4.99	2.6%
Seasonal-UR	369		\$1.44	3.5%	\$1.44	3.4%	\$1.44	2.8%	\$1.44	1.6%
Seasonal-R1	369		\$2.46	3.5%	\$2.46	3.4%	\$2.46	3.0%	\$2.46	2.0%
Seasonal-R2	369		\$4.99	5.8%	\$4.99	5.6%	\$4.99	5.1%	\$4.99	3.6%
GSe	2,000		\$5.93	3.2%	\$5.93	3.0%	\$5.93	2.5%	\$5.92	1.3%
UGe	2,000		\$3.95	4.0%	\$3.95	3.7%	\$3.95	2.7%	\$3.95	1.1%
GSd	34,334	110	\$80.81	3.3%	\$80.81	3.5%	\$80.81	2.8%	\$91.32	0.9%
UGd	42,592	111	\$48.62	3.3%	\$48.62	3.8%	\$48.62	2.3%	\$54.94	0.5%
St Lgt	1,274		\$5.26	3.3%	\$5.26	3.1%	\$5.26	2.8%	\$5.25	1.6%
Sen Lgt	49		\$0.43	3.4%	\$0.43	3.3%	\$0.43	3.2%	\$0.43	2.3%
USL	477		\$1.87	3.4%	\$1.87	3.3%	\$1.87	2.9%	\$1.87	1.7%
DGen	1,709	12	\$11.98	3.3%	\$11.98	3.3%	\$11.98	3.0%	\$11.97	1.7%
ST	1,373,443	2,808	\$218.35	3.6%	\$218.35	1511.5%	\$218.35	0.8%	\$246.74	0.1%
AUR	750		\$1.19	3.5%	\$1.19	3.4%	\$1.19	2.2%	\$1.19	0.9%
AUGe	2,000		\$2.43	4.0%	\$2.43	3.9%	\$2.43	2.4%	\$2.43	0.8%
AUGd	47,636	134	\$18.43	3.2%	\$18.43	5.0%	\$18.43	1.5%	\$20.83	0.2%
AR	750		\$1.45	3.5%	\$1.45	3.3%	\$1.45	2.3%	\$1.45	1.0%
AGSe	2,000		\$3.09	3.8%	\$3.09	3.5%	\$3.09	2.4%	\$3.09	0.9%
AGSd	64,000	178	\$34.44	3.2%	\$34.44	4.3%	\$34.44	1.8%	\$38.92	0.2%

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**CONSUMERS COUNCIL OF CANADA
INTERROGATORY - 02**

4 **Reference:**

5 Exhibit A-6-1, Page 6

7 **Interrogatory:**

8 Hydro has provided in Table 1 a summary of the damage resulting from the Z-factor event.
9 Does Hydro One know what the condition of the assets that were replaced were at the
10 time of the storm (poles, cross arms, and transformers)? If so, please provide data
11 regarding the condition of each asset category in each rate zone?

13 **Response:**

14 Please see Interrogatory I-05-04.

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**CONSUMERS COUNCIL OF CANADA
INTERROGATORY - 03**

Reference:

Exhibit A-6-1, Page 6

Interrogatory:

a) The evidence states that across the impacted areas, freezing rain coated power lines, poles and vegetation with significant amounts of ice. Please provide a copy of Hydro One's most current vegetation management strategy. Does that strategy differ across Hydro One's service territory? If so, is it different for each of the rate zones? Please explain. Does Hydro One have any current plans to revisit that strategy/strategies in light of the most recent storm?

Response:

a) Hydro One's current vegetation management strategy is described in EB-2021-0110, Exhibit E-03-02, Section 2.4. Attachment 2.

Generally, Hydro One applies an identical approach for vegetation management across its entire service territory. The one exception is the Northern region where Balsam Fir and Poplars are typically more present, pose a greater issue and therefore receive greater attention when being evaluated risk.

Hydro One is currently considering further strategies and investments to enhance the resilience of distribution infrastructure to withstand extreme weather events, including the use of use of technology and remote imaging to complement Vegetation management.

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CONSUMERS COUNCIL OF CANADA INTERROGATORY - 04

Reference:

Exhibit A-6-1, Page 7

Preamble:

Hydro One has set out a list of recent Major Historical Events and a comparison of the interruptions and net costs.

Interrogatory:

- a) How does Hydro One define “customer interruptions”;
- b) Did Hydro One apply for Z-factor relief for any of the other events listed? If so, was Z-factor relief granted? If not, why not?;
- c) Why were the overall costs for this event significantly greater than the costs for the 2022 Derecho?

Response:

- a) Hydro One uses the Electricity Canada definition for Customer Interruptions: ‘the sum of products of the customer services interrupted by the number of interruptions that affect those customer services.’
- b) and c) Please refer to Interrogatory I-01-08.

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CONSUMERS COUNCIL OF CANADA INTERROGATORY - 06

Reference:

Exhibit A-6-1, Page 16

Preamble:

Hydro One has set out in Table 4 the Z-factor Net Capital Expenditures, Revenue Requirement Impact of Capital Expenditures, and Asset Removal Costs. Total costs are \$223 million and net capital expenditures are \$196.2 million:

Interrogatory:

- a) Please provide a detailed calculation as to how the \$223 million was derived;
- b) Please provide a detailed calculation as to how the \$196.2 million was derived;
- c) Please provide a detailed calculation as to how the Asset Removal Costs were derived;
- d) Please provide a detailed calculation as to how the Revenue Requirement Impact of Capital Expenditures was derived;
- e) How does Hydro One define “net capital expenditures”?

Response:

- a) The \$223 million is the gross capital expenditures incurred as a result of the Z-Factor event and comprises of internal labour, fleet, external contractor, material and other expenditures as shown in Table 1 below.

1

Table 1 - Gross Capital Expenditures by Rate Zone

Gross Capital Expenditures (\$M)				
	Hydro One Distribution Rate Zone	Peterborough Rate Zone	Orillia Rate Zone	Total
Internal Labour	89.7	1.9	0.5	92.2
Fleet	14.1	0.4	0.1	14.6
External Contractors	85.7	5.4	1.2	92.4
Material	16.4	0.2	0.0	16.5
Other	6.6	0.5	0.1	7.2
Total Gross Capital Expenditures	212.4	8.4	2.0	222.9

2

b) The \$196.2 million is the net capital expenditures incurred as a result of the Z-Factor event and is calculated as gross capital expenditures less asset removal costs.

3

4

5

Table 2 - Net Capital Expenditures by Rate Zone

Net Capital Expenditures (\$M)				
	Hydro One Distribution Rate Zone	Peterborough Rate Zone	Orillia Rate Zone	Total
Internal Labour	79.0	1.7	0.5	81.2
Fleet	12.4	0.3	0.1	12.8
External Contractors*	75.4	4.8	1.1	81.3
Material	14.4	0.1	0.0	14.6
Other	5.8	0.5	0.1	6.3
Total Net Capital Expenditures	187.0	7.4	1.8	196.2

*includes labour, materials, fleet, other, and sub-contractor costs

6

c) Asset removal costs are described in further detail in the response to Interrogatory I-01-01.

7

8

9

d) See Tables 3-5 with the calculations on how Revenue Requirement Impact of Capital Expenditures was derived.

10

1 **Table 5: Revenue Requirement Impact of Capital Expenditures Orillia RZ**

	Calculations	2025	2026	2027	2028	2029	2030	Total
ROE %	A	9.85%	9.85%	9.85%	9.85%	9.85%	9.85%	
Long-term Debt Rate	B	6.25%	6.25%	6.25%	6.25%	6.25%	6.25%	
Short-term Debt Rate	C	1.33%	1.33%	1.33%	1.33%	1.33%	1.33%	
Capital Expenditures	D	\$1.8M						
In-Service Additions	E = D	\$1.8M						
Average Net Utility Plant	F = E	\$0.9M	\$1.8M	\$1.7M	\$1.7M	\$1.6M	\$1.6M	
Working Capital	G	\$0.0M	\$0.0M	\$0.0M	\$0.0M	\$0.0M	\$0.0M	
Rate Base	H = F + G	\$0.9M	\$1.8M	\$1.7M	\$1.7M	\$1.7M	\$1.6M	
Depreciation	I	\$0.0M	\$0.0M	\$0.0M	\$0.0M	\$0.0M	\$0.0M	\$0.2M
Asset Removal Costs	J	\$0.2M						\$0.2M
Return on Debt	$K = (H \times 56\% \times B) + (H \times 4\% \times C)$	\$0.0M	\$0.1M	\$0.1M	\$0.1M	\$0.1M	\$0.1M	\$0.3M
Return on Equity	$L = H \times 40\% \times A$	\$0.0M	\$0.1M	\$0.1M	\$0.1M	\$0.1M	\$0.1M	\$0.4M
Income Tax	M	\$0.0M						
Revenue Requirement	N = I + J + K + L + M	\$0.4M	\$0.1M	\$0.1M	\$0.1M	\$0.1M	\$0.1M	\$1.1M

2 e) Hydro One defines 'net capital expenditures' as gross capital expenditures less capital
 3 contributions and asset removal costs. There are no capital contributions related to
 4 the Z-factor amounts, and as a result the Z-Factor related net capital expenditures are
 5 equal to gross capital expenditures less asset removal costs.

¹ 50% in-service additions first year, subsequent years take into account accumulated depreciation associated with the in-service additions.

² Based on capital structure of 40% common equity, 56% long-term debt, and 4% short-term debt

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**CONSUMERS COUNCIL OF CANADA
INTERROGATORY - 07**

Reference:

Exhibit A-6-1, Page 16

Preamble:

Hydro One has proposed that in the interest of regulatory efficiency it is not seeking recovery of OM&A costs it incurred due to the Z-factor event:

Interrogatory:

- a) What is the total amount of OM&A incurred by rate zone for the Z-factor event?
- b) Please explain how those OM&A amounts by rate zone were derived;
- c) Are there capitalized labour costs included in the capital expenditures? If so, please set out those costs and provide all assumptions used to derive those costs.

Response:

- a) and b) see response to Interrogatory I-01-04.
- c) See response to Interrogatory I-05-01.

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**CONSUMERS COUNCIL OF CANADA
INTERROGATORY - 08**

Reference:

Exhibit A-6-1, Page 19

Interrogatory:

Hydro One has confirmed that its achieved ROE did not exceed the OEB deemed ROE in 2024. The achieved ROE was 9.79% or 43 basis points above the deemed ROE of 9.36%. What was the dollar value of the 43 basis points? What is the projected ROE for 2025?

Response:

To clarify, Hydro One's Achieved ROE has exceeded the OEB deemed ROE by a 43 basis point difference in 2024. The dollar value of this 43 basis points differential is approximately \$17 million.

Hydro One does not normally prepare a projected achieved ROE calculation until audited results are available due to the variability in calculation inputs. As of September 30, 2025, Hydro One has estimated on a best efforts basis that the projected ROE for 2025 is approximately [REDACTED]. This estimate is subject to change based on various factors which can include timing of business activity, cost of power, and weather.

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**CONSUMERS COUNCIL OF CANADA
INTERROGATORY - 09**

Reference:

Exhibit A-6-1, Page 21

Interrogatory:

a) Asset removal costs are the necessary expenses associated with dismantling, decommissioning, or disposing of assets that are damaged or have reached the end of their useful life. Is Hydro One aware of any Z-factor applications where the recovery of asset removal costs was approved by the OEB? If so, please provide a list of those applications.

Response:

a) Hydro One has not completed an exhaustive review of Z-factor applications before the OEB but expects that all storm-related Z-factor applications would include similar costs to dismantle, decommission, or dispose of assets. Hydro One's treatment of Asset Removal Costs is consistent with USGAAP accounting and reporting standards – see Interrogatory I-01-01.

Hydro One does note that within Elexicon Energy's EB-2022-0317 Z-factor application the OEB found that disposal costs are more appropriately expensed, and approved recovery of these costs in this manner. Hydro One's treatment of Asset Removal Costs is consistent with the OEB's finding as they are expensed in year.

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CONSUMERS COUNCIL OF CANADA INTERROGATORY - 10

Reference:

Exhibit A-6-1, Page 22

Interrogatory:

Please provide evidence to demonstrate that the level of costs incurred in response to the Z-factor were prudent. Please provide evidence that Hydro One's emergency response plan is aligned with industry best practices.

Response:

The costs incurred in response to the Z-Factor event were prudent, reasonable, and necessary to ensure the safe and timely restoration of power to customers.

The Z-Factor event was the most significant extreme weather event Hydro One has experienced and impacted approximately 1.2 million customers, or 76% of Hydro One's customer base. Hydro One restored power to 44% of its customers within twelve hours of their outages and addressed 90% of outages within four to five days. The sheer magnitude of the event was unprecedented and the restoration efforts were necessary and were conducted in a manner that was appropriate and consistent with industry best practice.

Hydro One's approach to emergency response is described in its Distribution Emergency Management Procedure (DEMP) provided in response to Interrogatory I-01-06. The DEMP is aligned with the Incident Management System (IMS) framework, which is the industry standard for emergency management in the electricity sector across North America.

Hydro One's Emergency Management plans, procedures, and training are aligned with the core concepts outlined by the IMS framework:

- **Unity of Command** – Ensures that each individual reports to only one designated supervisor, promoting clear direction and accountability.
- **Span of Control** – Maintains an optimal number of direct reports per leader (typically between 3 and 7) to ensure effective supervision and decision-making.
- **Flexibility & Scalability** – Allows the IMS to expand or contract based on the complexity and scale of the incident.
- **Clear Roles & Responsibilities** – Minimizes overlap and gaps by clearly defining duties, enabling coordinated and efficient response efforts.

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1 By aligning with these principles, Hydro One ensures that its emergency response plans
2 are appropriate and the costs incurred to address emergency situations are reasonable
3 and prudent.

4

5 In addition, Hydro One's ongoing vegetation management program is reasonable and
6 prudent and operates to mitigate storm impacts. See Interrogatory I-01-06 part e) for
7 details.

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CONSUMERS COUNCIL OF CANADA INTERROGATORY - 13

Reference:

Exhibit A-6-1, Page 21 and 26

Interrogatory:

Hydro One's approved Asset Removal Costs are \$77 million for 2025 and forecast to be \$96.4 million. Why is Hydro One seeking recovery of \$25.5 million and not \$19.4 million in its Z-factor request?

Response:

The 2025 forecast of \$96.4 million provided in Exhibit A-06-01 was based on year to date (YTD) actuals as of July 31, 2025. In response to Interrogatory I-05-12 Hydro One has provided an updated 2025 forecast of \$100.1M based on YTD actuals as of September 30, 2025.

Cumulatively over the 2023-2027 rate term, for the years 2023 - 2025 there are \$221.1M of Asset Removal Costs included in the Hydro One Distribution rates¹ and the Hydro One Distribution projects are projected to have incurred \$256.1M² in Asset Removal Costs by the end of 2025, exceeding the amounts in base rates by approximately \$35M.

Hydro One's application seeks the recovery of amounts that are directly attributable to the Z-factor event which includes \$26.7M in Asset Removal Costs, \$25.5M of which are attributable to the Hydro One Distribution.

¹ 2023: \$72.1M, 2024: \$72.0M, 2025: \$77.0M

² 2023: \$68.9M, 2024: \$87.1M, 2025: \$100.1M

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**CONSUMERS COUNCIL OF CANADA
INTERROGATORY - 14**

4 **Reference:**

5 Exhibit A-9-1, Page 2

7 **Interrogatory:**

8 Please explain why some Hydro One Distribution RZ customers are experiencing
9 distribution rate decreases as a result of this Application.

11 **Response:**

12 The reduction in the distribution charges for medium-density (R1) and low-density (R2)
13 residential customers in Hydro One Distribution RZ is driven by the following factors:

- 14 • application of Distribution Rate Protection (DRP), which caps their monthly distribution
15 charges (currently at \$42.88 per month); and
- 16 • proposed credit rate rider for disposition of the Earnings Sharing Mechanism deferral
17 account.

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Table 8 (Updated) - Hydro One Distribution Capital Expenditures (\$M)

OEB Category	Capital Expenditures – 2023			Capital Expenditures - 2024			Capital Expenditures - 2025			
	OEB Approved ¹	Actual	Variance	OEB Approved ¹	Actual	Variance	OEB Approved ¹	Actual Q3/2025	Y/E Forecast	Variance to Forecast
System Access	252.2	335.9	83.7	253.3	355.2	101.8	238.9	232.7	366.0	127.1
System Renewal	314.5	292.6	-21.9	356.5	436.6	80.1	520.1	418.3	561.0	40.9
System Service	182.0	166.9	-15.1	157.2	164.9	7.7	241.6	70.8	146.0	-95.6
General Plant	172.2	194.5	22.3	182.2	158.9	-23.3	179.0	85.7	112.6	-66.4
Total	920.8	989.8	69.0	949.2	1,115.6	166.4	1,179.7	807.3	1,185.6	5.9

2 b) Please see requested information below.

¹ EB-2021-0110, Decision on Settlement Proposal and Order on Rates, Revenue Requirement and Charge Determinants, Hydro One Networks Inc., November 29, 2022, Schedule A, pp. 257-258 (Tables 25 and 26)

1 **Table 8 (New) - Hydro One Distribution Capital Expenditures – Orillia RZ (\$M)**

OEB Category	Capital Expenditures – 2023			Capital Expenditures - 2024			Capital Expenditures - 2025			
	Plan ²	Actual	Variance	Plan ²	Actual	Variance	Plan ²	Actual Q3/2025	Y/E Forecast	Variance to Forecast
System Access	1.2	1.3	0.1	1.1	1.1	-	1.1	0.7	1.7	0.6
System Renewal	0.6	0.4	-0.2	1.0	0.6	-0.4	3.8	4.0	7.2	3.4
System Service	0.2	0.4	0.2	0.2	0.2	-	0.2	0.1	1.7	1.5
General Plant	-	-	-	-	-	-	-	-	-	-
Total	2.0	2.2	0.2	2.4	2.0	-0.4	5.1	4.8	10.6	5.8

2 **Table 8 (New) - Hydro One Distribution Capital Expenditures – Peterborough RZ (\$M)**

OEB Category	Capital Expenditures – 2023			Capital Expenditures - 2024			Capital Expenditures - 2025			
	Plan ²	Actual	Variance	Plan ²	Actual	Variance	Plan ²	Actual Q3/2025	Y/E Forecast	Variance to Forecast
System Access	2.3	-0.1 ³	-2.4	2.4	1.2	-1.2	2.4	1.8	3.5	1.1
System Renewal	1.4	0.9	-1.5	4.2	1.0	-3.2	2.7	8.7	13.7	11.0
System Service	0.2	-0.6 ³	-0.3	0.2	0.1	-0.1	0.3	0.1	0.3	-
General Plant	-	-	-	-	-	-	-	-	-	-
Total	4.0	0.2	-4.1	6.8	2.2	-4.6	5.4	10.5	17.5	12.1

² EB-2018-0242, Post-application filing: HONI_OPDC_PDI_DSP Section 5-01-Appendix 2-AA and 2-AB_20221130

³ There was an offset to capital due to the impact of capital contributions

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- 1 e) Hydro One's 2025 year-end forecast of total Asset Removal Costs as of September
2 30, 2025 is \$102.3M (\$100.1M for the Hydro One Distribution, \$1.5M for the
3 Peterborough Rate Zone, and \$0.7M for the Orillia Rate Zone).
4
- 5 f) Exhibit A-06-01, Table 12, includes the year-end forecast of Asset Removal Costs as
6 of July 31, 2025 for the Peterborough and Orillia Rate Zones. The year end forecasts
7 as of September 30, 2025 for Orillia and Peterborough are provided in part e) of this
8 interrogatory.

**SCHOOL ENERGY COALITION
INTERROGATORY - 06**

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Reference:

Exhibit A-06-01, Table 13

Interrogatory:

Please provide further details on what is included in Asset Removal Costs.

Response:

See response to Interrogatory I-01-01.

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¹ **Table 1 - Hydro One Distribution Net Cash Working Capital Requirement¹**

	Net Lag (Lead Days)	2025 (\$M)	2026 (\$M)	2027 (\$M)
	(A)	(B)	(C)	(D)
Expenses				
Removals	20.3	25.5	-	-
Interest on Long-term Debt	41.2	2.2	4.3	4.3
Income Tax	34.5	4.9	(1.9)	(1.5)
Total		32.7	2.4	2.7
HST (related to Revenue and Removal costs)		5.3	1.7	1.7
Total Amounts Paid/Accrued		38.0	4.1	4.4
<u>Working Capital Required</u>				
(Calculations based on above values, for each expense category, calculated using the following formula: For Years 2025 to 2027 (Col (B)*Col (A)/365))				
Removal Costs		1.4	-	-
Interest Expense		0.3	0.5	0.5
Income Tax		0.5	(0.2)	(0.1)
Total		2.1	0.3	0.3
HST (related to Revenue and removal costs)		(0.1)	(0.1)	(0.1)
Distribution Net Cash Working Capital Required		2.0	0.3	0.3

¹ Numbers may not add due to rounding

1

Table 2 - Peterborough RZ Net Cash Working Capital Requirement²

	Net Lag (Lead Days)	2025 (\$M)	2026 (\$M)	2027 (\$M)	2028 (\$M)	2029 (\$M)	2030 (\$M)
	(A)	(B)	(C)	(D)	(E)	(F)	(G)
Expenses							
Removals	20.3	1.0	-	-	-	-	-
Interest on Long-term Debt	41.2	0.1	0.2	0.2	0.2	0.2	0.2
Income Tax	34.5	0.2	(0.1)	(0.1)	(0.1)	(0.0)	(0.0)
Total	-	1.3	0.1	0.1	0.1	0.1	0.1
HST (related to Revenue and Removal costs)		0.2	0.1	0.1	0.1	0.1	0.1
Total Amounts Paid/Accrued		1.5	0.2	0.2	0.2	0.2	0.2
Working Capital Required							
<i>(Calculations based on above values, for each expense category, calculated using the following formula: For 2025 to 2030 (Col (B)*Col A)/365)</i>							
Removal Costs		0.1	-	-	-	-	-
Interest Expense		0.0	0.0	0.0	0.0	0.0	0.0
Income Tax		0.0	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)
Total		0.1	0.0	0.0	0.0	0.0	0.0
HST (related to Revenue and removal costs)		(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)
Peterborough Net Cash Working Capital Required		0.1	0.0	0.0	0.0	0.0	0.0

² Numbers may not add due to rounding

1 **Table 3 - Orillia RZ Net Cash Working Capital Requirement³**

	Net Lag (Lead Days)	2025 (\$M)	2026 (\$M)	2027 (\$M)	2028 (\$M)	2029 (\$M)	2030 (\$M)
	(A)	(B)	(C)	(D)	(E)	(F)	(G)
Expenses							
Removals	20.3	0.2	-	-	-	-	-
Interest on Long-term Debt	41.2	0.0	0.1	0.1	0.1	0.1	0.1
Income Tax	34.5	0.1	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)
Total		0.3	0.0	0.0	0.0	0.1	0.1
HST (related to Revenue and Removal costs)		0.1	0.0	0.0	0.0	0.0	0.0
Total Amounts Paid/Accrued		0.4	0.1	0.1	0.1	0.1	0.1
Working Capital Required							
<i>(Calculations based on above values, for each expense category, calculated using the following formula: For 2025 to 2030 (Col (K)*Col A)/365)</i>							
Removal Costs		0.0	-	-	-	-	-
Interest Expense		0.0	0.0	0.0	0.0	0.0	0.0
Income Tax		0.0	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)
Total		0.0	0.0	0.0	0.0	0.0	0.0
HST (related to Revenue and removal costs)		(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)
Orillia Net Cash Working Capital Required		0.0	0.0	0.0	0.0	0.0	0.0

- 2 b) No, Hydro One is not seeking to update short-term debt rates or variable rates for
 3 future years. These rates utilized are those established in Hydro One's EB-2021-0110
 4 rates application, which do not allow for update through the 2023-2027 rate term.

³ Numbers may not add due to rounding

**VULNERABLE ENERGY CONSUMERS COALITION
 INTERROGATORY - 01**

Preamble:

Hydro One seeks recovery of the following costs related to the March 29, 2025 storm:

	Hydro One Distribution	Peterborough RZ	Orillia RZ	Total
Z-factor (\$M)	\$187.0 M	\$7.4	\$1.8	\$196.2
Asset Removal Costs (\$M)	\$25.5	\$1.0	\$0.2	\$26.7
Total (\$M)	\$212.5	\$8.4	\$2.0	\$222.9

Interrogatory:

- a) Please provide a detailed breakdown and explanation of the Z-factor costs by Rate Zone.
- b) Please provide a detailed breakdown of asset removal costs by Rate Zone.
- c) Hydro One indicates the majority of the costs incurred were capital. Please describe Hydro One's capitalization policy and the rationale/criteria used to determine capitalized costs.
- d) Please confirm whether any labour charges have been capitalized. If so, provide a detailed explanation of how these costs are directly attributable to the restoration work.
- e) Hydro One is not seeking recovery of the OM&A costs it incurred due to the Z-factor event. Please provide the OM&A costs related to the event.
- f) Have the Z-factor costs been audited. If not, when will this occur?

Response:

- a) The total Z-Factor net capital expenditures \$196.2 million comprises of internal labour, fleet, external contractor, material, and other expenditures as shown in Table 1 by rate zone.

The External Contractor cost line item includes labour, vehicle, accommodations, meals, fuel and toll charges incurred by external personnel from utilities and contractors who assisted with restoration efforts.

The Other cost line item consists of tools and supplies, accommodations, meals, fuel and toll charges incurred by internal personnel while restoring electricity service to

1 Hydro One customers, as well as corporate overheads in alignment with Hydro One's
2 capitalization policy.

3
4

Table 1 - Z-Factor Net Capital Expenditures by Rate Zone

	Hydro One Distribution	Peterborough Rate Zone	Orillia Rate Zone	Total
Internal Labour (\$M)	79.0	1.7	0.5	81.2
Fleet (\$M)	12.4	0.3	0.1	12.8
External Contractor (\$M)	75.4	4.8	1.1	81.3
Material (\$M)	14.4	0.1	0.0	14.6
Other (\$M)	5.8	0.5	0.1	6.3
Z-Factor Costs (\$M)	187.0	7.4	1.8	196.1

5 b) See response to Interrogatory I-01-01.

6

7 c) and d) During an emergency restoration, Hydro One's primary focus is rebuilding or
8 replacing damaged assets. This work includes the removal of damaged assets
9 followed by the installation of the new assets. Consistent with Hydro One's
10 capitalization policy, expenditures that are directly attributable to and necessary to
11 place the new asset into the location and condition for its intended use are capitalized,
12 as they are expected to generate future economic benefit for Hydro One. Expenditures
13 related to the retirement and removal of the damaged assets are expensed as
14 incurred, as Asset Removal Costs. These Asset Removal Costs do not meet the
15 criteria for capitalization, as they do not generate future economic benefit.

16

17 Hydro One's capitalization policy provides that labour charges are capitalized when
18 they are directly attributable to the acquisition, construction, or betterment of an asset.
19 In accordance with this policy, labour costs are capitalized when they are necessary
20 to bring an asset into the location and condition required for its intended use. This
21 includes labour associated with the rebuilding or replacement of distribution assets
22 such as poles, conductors, and line transformers.

23

24 e) See Interrogatory I-01-04

25

26 f) See Interrogatory I-01-03

1 **VULNERABLE ENERGY CONSUMERS COALITION**
2 **INTERROGATORY - 02**

3
4 **Reference:**

5 Exhibit A-6-1, Page 5

6
7 **Preamble:**

8 Figure 4 shows the magnitude of customers without power between March 29 and April
9 14 within each of the Hydro One operations centre geographic boundaries.

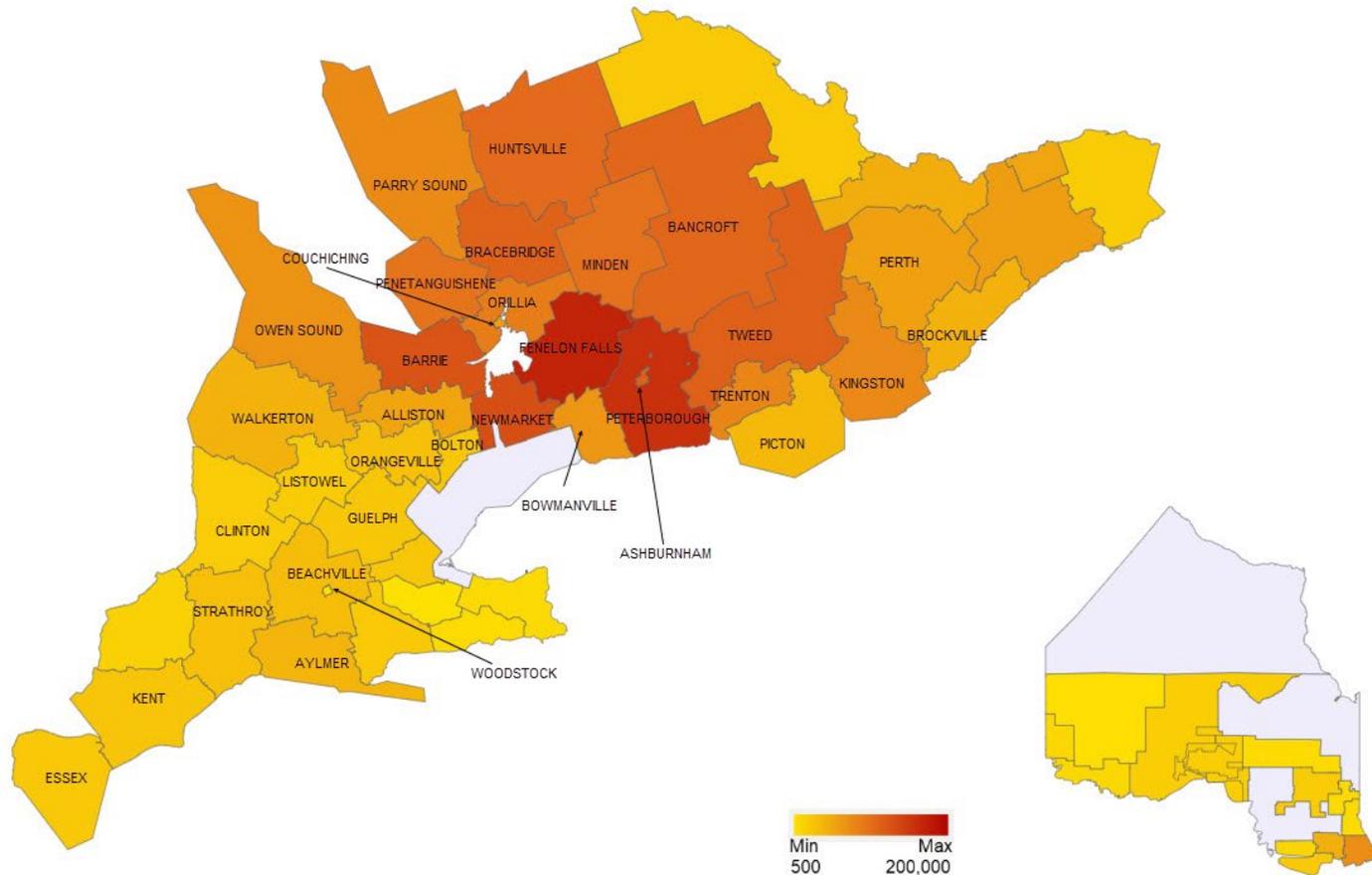
10
11 Damages occurred across the following Operations Centre: Ashburnham, Alliston,
12 Aylmer, Bancroft, Barrie, Beachville, Bolton, Bowmanville, Bracebridge, Brockville,
13 Clinton, Couchiching, Essex, Guelph, Fenelon Falls, Huntsville, Kent, Kingston, Listowel,
14 Minden, Newmarket, Orangeville, Orillia, Owen Sound, Parry Sound, Penetanguishene,
15 Perth, Peterborough, Picton, Strathroy, Trenton, Tweed, Walkerton, Woodstock.

16
17 **Interrogatory:**

18 Please overlay the names of the above Operations Centres on Figure 4.

19
20 **Response:**

Customers Out by Ops Centre



1
2

Figure 1: Customer Outages by Operation Centres

**VULNERABLE ENERGY CONSUMERS COALITION
INTERROGATORY - 03**

Interrogatory:

- a) Please summarize Hydro One’s Vegetation Management strategy and in the response include the cycle length, the current year of the cycle and a map of the cycle.
- b) Please provide Hydro One’s Vegetation Management amount approved in rates for Hydro One Distribution, Peterborough and Orillia.
- c) Please provide Hydro One’s Vegetation Management budget compared to actuals by Rate Zone for the years 2022 to 2025.
- d) Please complete the following Table by Rate Zone.

	2022	2023	2024	2025
Vegetation Management Planned Accomplishments				
Vegetation Management Actual Accomplishments				

- e) Please discuss Hydro One’s historical investments in resilient infrastructure.

Response:

- a) Hydro One’s Vegetation Management Strategy is discussed in Interrogatory I-01-06 part e).

Hydro One’s distribution vegetation management program consists of a cycle-based approach using a prescriptive methodology tailored to the voltage level and criticality of power lines. It relies on a suite of structured assessment tools aimed at characterizing overhang, hazard trees, and trimming needs to guide consistent, decisions in the field within a pre-defined envelop. These tools help foresters evaluate vegetation hazards based on species characteristics, structural integrity, proximity to energized apparatus, and environmental exposure. The approach ensures that vegetation removal is prioritized by impact to reliability and safety. The strategy also incorporates adaptive prescriptions based on access conditions (on-road vs. off-road, work on islands, etc.).

- 1 Hydro One's vegetation management program consists of the following:
- 2 • Planned vegetation removal in proximity to overhead assets
 - 3 • A brush management program, focusing on addressing vegetation below
4 overhead conductor to facilitate access to the right-of-way and minimize high
5 vegetation management costs in the long-term;
 - 6 • A demand program, focusing on requests for forestry work made by internal
7 and external customers; and
 - 8 • An outliers program initiated in 2024 to mitigate the impact of tree contacts in
9 dedicated areas in addition to regular maintenance cycle.

10
11 Hydro One introduced the Optimal Cycle Protocol program in 2018 to inspect and manage
12 vegetation on Right of Ways (ROW) using cycle lengths of 3 to 5 years. All Hydro One,
13 Orillia, and Peterborough ROWs have completed their first maintenance cycle as part of
14 this program. Approximately 60% of all ROWs have had their second maintenance cycle
15 complete and 79% of all ROWs had planned maintenance completed within the last 4
16 years (i.e. prior to the Z-factor event).

17
18 Below is a map of the southern portion of Ontario where the storm was active showing the
19 right of ways cleared by years since last clearance.

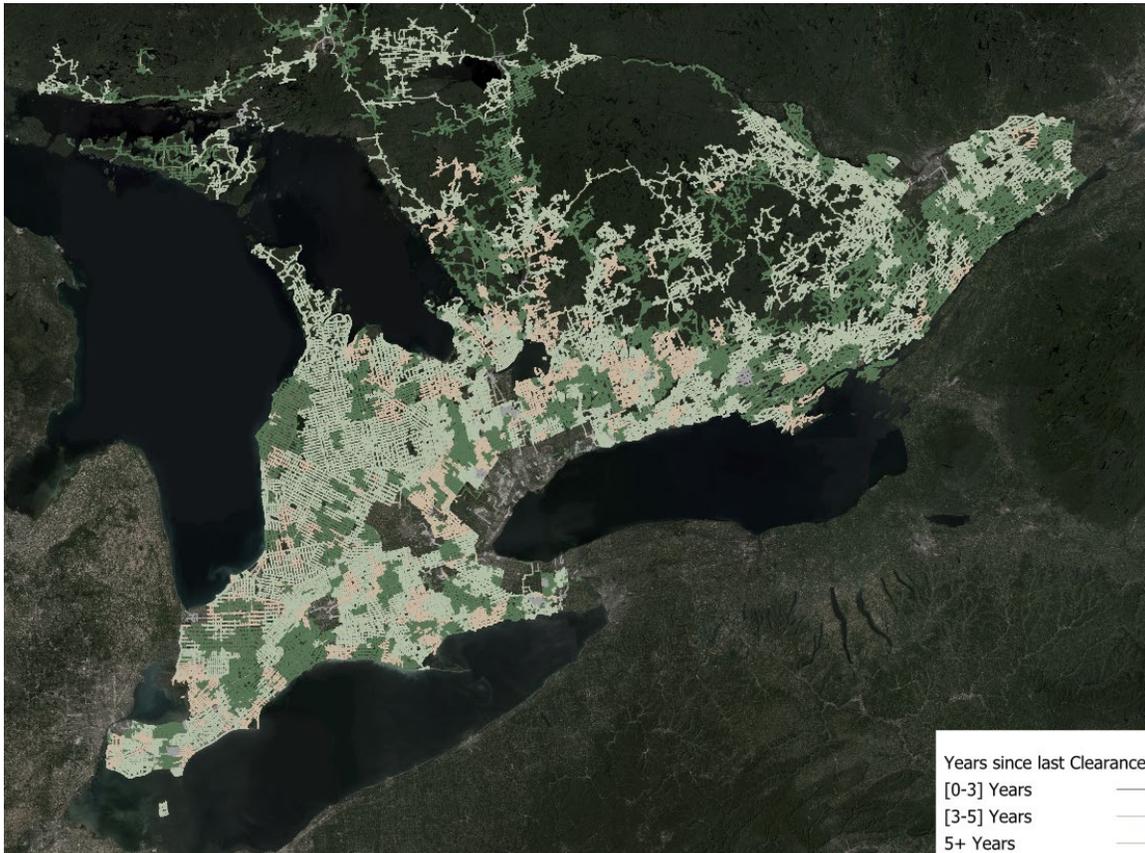


Figure 1: Map of Right of Ways Maintained by Years Since Last Clearance

1
2
3
4 b) Hydro One Distribution sets its revenue requirement based on a Custom IR framework
5 whereby the total OM&A is approved by the OEB in year one and escalated
6 formulaically in future years of the rate period. Hydro One manages total OM&A
7 relative to the overall approved amount in rates however there is no “approved”
8 Vegetation Management amount in rates. Orillia and Peterborough RZs are on ten-
9 year deferred rebasing period. Please see part c).

10
11 In the current rate period, Hydro One has spent more OM&A than the total OEB-
12 approved OM&A in 2023 and 2024.

13
14 Hydro One exceeded its approved Distribution OM&A, in part due to higher Trouble
15 Call program. These increased, and mandatory, reactive expenditures have resulted
16 in deferral of some planned work in programs such as the Vegetation Management
17 program as seen in part c) below.

- 1 c) Hydro One’s Vegetation Management Program plan and actual expenditures for 2022
 2 – 2025 are provided below.

3 **Table 1 Vegetation Management Expenditures (\$M)**

	2022		2023		2024		2025	
	Plan*	Actual	Plan*	Actual	Plan*	Actual	Plan*	YE Forecast
Hydro One	124.0	117.3	112.3	99.3	114.4	97.5	121.0	69.3
Peterborough	0.5	0.6	0.5	0.2	0.6	1.4	0.6	0.7
Orillia	0.2	0.3	0.3	0.8	0.3	0.9	0.3	0.0**

* Plan amounts reflect the annual forecast spend

** Year-End Forecast for 2025 for Peterborough is \$11K which when rounded shows as 0.0.

- 4 d) Please see below:

5 **Table 2: Right of Way Kilometers Cleared by Rate Zone**

Right of Way Kilometers Cleared		2022	2023	2024	2025
HONI Dx	Planned	31,983	18,088	21,009	21,791
	Actuals / YE Forecast	23,223	14,296	12,340	7,903
Peterborough	Planned	123	123	123	123
	Actuals / YE Forecast	76	0	69	24
Orillia	Planned	58	58	58	58
	Actuals / YE Forecast	9	39	27	1

Note 1: Accomplishments are reported once work has been executed and trees have been trimmed/removed. However, towards the end of a year there may be a reporting lag with accomplishments only recognized in the following year. 2025 values for Actuals are Year-End Forecasts.

- 6 e) For Hydro One’s historical investments in resilient infrastructure, please see
 7 discussion in EB-2021-0110, Exhibit B-1-1, Section 1.8.3.1 and Interrogatory I-01-06
 8 part e).

1 **VULNERABLE ENERGY CONSUMERS COALITION**
2 **INTERROGATORY - 04**

3
4
5 **Reference:**

6 Exhibit A-6-1, Page 6

7
8 **Preamble:**

9 Table 1 provides the asset damage resulting from the Z-factor event.

10
11 **Interrogatory:**

12 a) Please provide Table 1 broken down by Rate Zone.

13
14 b) For provide the latest condition of each asset category prior to the storm.

15 Asset Quantities #Very Good #Good #Fair #Poor #Very Poor Total
Broken Poles
Broken Cross
Arms
Broken
Transformers

16
17 c) Please confirm all of the broken assets were replaced. If not, please discuss Hydro
18 One's restoration approach.

19
20 d) Please confirm assets were replaced on a like-for-like basis, with no enhancements or
21 betterments beyond what was necessary for safe and timely restoration.

22
23 e) Please provide details of replaced assets by Rate Zone previously scheduled for
24 replacement in the DSP.

1 **Response:**

2 a) The damage resulting from the Z-Factor event is presented in Table 1 by rate zone.

3
4 **Table 1 - Z-Factor Event Damage by Rate Zone**

	Hydro One Distribution	Peterborough Rate Zone	Orillia Rate Zone	Total
Broken Poles	2890	180	18	3088
Broken Cross Arms*	3269	239	19	3527
Damaged Transformers	758	1	0	759
Transformer Spills	170	0	0	170

5 *239 and 19 units of crossarms are allocated to Peterborough and Orillia RZs respectively
6 based on Crossarm to Pole ratio recorded in the corresponding operation centers.

7
8 b) Hydro One conducts regular asset inspections which identifies equipment and
9 components that are substandard and in poor condition. Asset condition for cross arms
10 are tracked by exception only when poor condition is identified during Distribution Line
11 Patrols. Pole-top transformers are run to failure assets and Hydro One typically does
12 not track or record asset condition.

13
14 As described in Interrogatory I-01-03, operational activities during the Z-Factor event
15 were focused on returning customers to service. For minor assets replaced during
16 storm events, Hydro One does not maintain detailed location records, such as for
17 crossarms and transformers, as these materials are often replaced as part of broader
18 restoration activities.

19
20 While location records are kept for poles, given the unprecedented scale of the storm
21 and the operational priority to restore power safely and effectively, it was not feasible
22 to record and reconcile detailed replacement data for every location in real time. As a
23 result, pole location data is only available for the majority of the poles replaced. Using
24 this location data, Hydro One can cross-reference and provide the asset condition.

25
26 To validate the total quantity of assets replaced during the storm events, Hydro One
27 relied on inventory issuance and materials management records, which accurately
28 tracks the total volume of materials used in the restoration effort. Tables 2, 3, and 4
29 outline asset condition by rate zone.

1 **Table 2 - Hydro One Distribution Asset by Asset Type**

Asset Type	Total asset replaced	# of Assets in fair/good condition	# of Assets in poor condition	# of Assets Condition cannot be cross-reference
Broken Poles	2890	2015	184	691
Broken Cross Arms*	3269	0	24	3245
Broken Transformers**	758	0	2	756

3 **Table 3 - Peterborough RZ Distribution Asset by Asset Type**

Asset Type	Total asset replaced	# of Assets in fair/good condition	# of Assets in poor condition	# of Assets Condition cannot be cross-reference
Broken Poles	180	11	2	167
Broken Cross Arms*	239	0	0	239
Broken Transformers**	1	0	0	1

5 **Table 4 - Orillia RZ Distribution Asset by Asset Type**

Asset Type	Total asset replaced	# of Assets in fair/good condition	# of Assets in poor condition	# of Assets Condition cannot be cross-reference
Broken Poles	18	17	1	0
Broken Cross Arms*	19	0	0	19
Broken Transformers**	0	0	0	0

- 7 c) All of the broken poles, broken crossarms and damaged transformers resulting from
 8 the Z-Factor event were replaced.
 9
 10 d) Confirmed. In Trouble and Storm situations, Hydro One replaces assets as near like-
 11 for-like as possible as long as the equipment or material is available.
 12
 13 e) See Response to Interrogatory I-01-02, Part c)

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1 **VULNERABLE ENERGY CONSUMERS COALITION**
2 **INTERROGATORY - 05**
3
4

5 **Reference:**

6 Exhibit A-6-1, Page 7
7

8 **Preamble:**

9 Table 2 provides the total number of customer interruptions and customer interruption
10 hours.
11

12 **Interrogatory:**

13 Please provide the total number of interruptions.
14

15 **Response:**

16 There were 9,733 interruptions related to the Z-Factor event.

Filed: 2025-10-31
EB-2025-0030
Exhibit I
Tab 5
Schedule 5
Page 2 of 2

1

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1 **VULNERABLE ENERGY CONSUMERS COALITION**
2 **INTERROGATORY - 06**
3
4

5 **Reference:**

6 Exhibit A-6-1, Page 7
7

8 **Preamble:**

9 Table 3 provides the SAIFI (0.8) and SAIDI (32.7) for the March 2025 storm.
10

11 **Interrogatory:**

12 With respect to tracking outages, please discuss how the duration of time to restore
13 customers beyond April 14 is treated with respect to SAIDI and SAIFI. Does the clock run
14 continuously in term of customer interruption hours until power is restored to the last
15 customer on May 8 - is all of this data included in SAIFI and SAIDI results related to the
16 storm?
17

18 **Response:**

19 Hydro One determines the interruption day based on the start date and time of the
20 interruption, not the restoration date or time. Accordingly, if an interruption began on April
21 13 and service was fully restored on April 15, the event is attributed to April 13.
22

23 For the purpose of SAIDI and SAIFI calculations, the duration of each individual customer
24 interruption is measured continuously from the start of the interruptions until service is fully
25 restored to that customer. This means that if an interruption extends beyond April 14, the
26 duration for that customer continues to accrue until restoration is complete.
27

28 Interruptions that started between March 29 and April 14 are included in the storm-related
29 SAIDI and SAIFI results, even if the restoration occurred after that date (for example on
30 April 15 or later). Interruptions that began after April 14 are not included in the event
31 statistics.
32

33 While the majority of customers were restored within 1 to 48 hours, some remote or hard-
34 to-access areas required additional time for temporary restoration measures, in some
35 cases extending into early May. These remaining restoration efforts are included in the
36 storm's total SAIDI and SAIFI calculations, as they stem directly from the Z-factor event.

Filed: 2025-10-31
EB-2025-0030
Exhibit I
Tab 5
Schedule 6
Page 2 of 2

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1 **VULNERABLE ENERGY CONSUMERS COALITION**
2 **INTERROGATORY - 07**

3
4 **Reference:**

5 Exhibit A-6-1, Page 9

6
7 **Preamble:**

8 Hydro One's restoration efforts during the storm event were guided by established
9 emergency response protocols, including the activation of its Distribution Emergency
10 Management Procedure (DEMP).

11
12 **Interrogatory:**

- 13 a) Please provide a copy of the DEMP.
14
15 b) Please confirm Hydro One did not deviate from its DEMP.
16
17 c) Please provide details of any proposed updates to the DEMP following the storm.

18
19 **Response:**

- 20 a) and b) Please refer to Interrogatory I-01-06.
21
22 c) Please refer to Interrogatory I-05-16.

Filed: 2025-10-31
EB-2025-0030
Exhibit I
Tab 5
Schedule 7
Page 2 of 2

1

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**VULNERABLE ENERGY CONSUMERS COALITION
 INTERROGATORY - 08**

Reference:

Exhibit A-6-1, Pages 4-5, Page 14

Preamble:

Each of the days from March 29-April 6 qualified as a Major Event Day. The majority of customer restorations took place between March 29 and April 14. Normal operations resumed on April 14, 2025 however, the final customer outage due to the Z-factor event was not resolved until early May. Permanent infrastructure replacements continued beyond May, with nearly all final restorations completed by June 30. Hydro One has included only those costs incurred up to and including June 30, 2025.

Interrogatory:

- a) Please provide a breakdown of Z-factor costs between Hydro One Distribution, Peterborough Rate Zone and Orillia Rate Zone between the following timeframes:
- i. March 29-April 6
 - ii. April 7-April 14
 - iii. April 15- May 8
 - iv. May 9-June 30

Response:

Table 1: Z-Factor Costs by Rate Zone and Time Frames Noted in I-VECC-08

Z-Factor Costs (\$M)				
	Hydro One Distribution Rate Zone	Peterborough Rate Zone	Orillia Rate Zone	Total
March 29 - April 6	71.3	1.4	0.3	73.0
April 7 - April 14	50.4	1.2	0.1	51.7
April 15 - May 8	25.9	0.5	0.2	26.5
May 9 - June 30	39.4	4.4	1.1	44.9
Total	187.0	7.4	1.8	196.1

The severe weather event began on March 29, bringing prolonged freezing rain and significant ice accumulation on trees and powerlines. Each day from March 29 to April 6 qualified as a Major Event Day, as reported in Hydro One's Major Event Response Report (filed as Exhibit A-06-01 Attachment 3).

1 As of April 11, Hydro One began its demobilization efforts starting with the release of the
2 first batch of mutual assistance crews. At this time Hydro One remained in an emergency
3 response state but downgraded the emergency from level 3 to level 1. By April 14, power
4 had been restored to a large majority of impacted customers, and normal operations were
5 declared. However, restoration efforts for the remaining Z-factor event outages continued
6 into May, with the final customer restored on May 8.

7
8 While Hydro One was able to restore power to all impacted customers by May 8, many of
9 these restorations included temporary measures for remote and hard-to-reach
10 customers. Between May 9 and June 30 Hydro One focused on permanent infrastructure
11 replacements, for these remote and hard-to-access areas. These activities were directly
12 tied to storm damage and as such have been included in Hydro One's Z-Factor claim.

1 **VULNERABLE ENERGY CONSUMERS COALITION**
2 **INTERROGATORY - 09**

3
4 **Reference:**

5 Exhibit A-6-1, Page 19

6
7 **Preamble:**

8 The achieved ROE for 2024 was 9.79%, 43 basis points above the deemed ROE of 9.36%.

9
10 **Interrogatory:**

11 Please provide the forecast ROE for 2025.

12
13 **Response:**

14 Please refer to Interrogatory I-02-08.

Filed: 2025-10-31
EB-2025-0030
Exhibit I
Tab 5
Schedule 9
Page 2 of 2

1

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1 **VULNERABLE ENERGY CONSUMERS COALITION**
2 **INTERROGATORY - 10**
3
4

5 **Reference:**

6 Exhibit A-6-1, Page 20
7

8 **Interrogatory:**

- 9 a) Please expand Table 9 to include the year 2022.
10
11 b) Please confirm the Distribution Lines Trouble Call and Storm Damage Response
12 amounts In base rates.
13
14 c) Please provide the equivalent emergency response/restoration amounts in base rates
15 for the Peterborough Rate Zone and Orillia Rate Zone.
16
17 d) Please provide the forecast compared to actual emergency response/restoration
18 amounts for the Peterborough and Orillia Rate Zones in the same format as Table 9
19 for the years 2022 to 2025.
20

21 **Response:**

a) Exhibit A-06-01 Table 9 has been updated with 2022 data.

Table 9 (Updated) - Hydro One Distribution Lines Trouble Call and Storm Damage Response Program (D-SR-05) Capital Expenditures (\$M)

Program	Capital Expenditures – 2022 ¹			Capital Expenditures - 2023			Capital Expenditures - 2024			Capital Expenditures - 2025		
	Forecast	Actual ²	Variance	Forecast ³	Actual	Variance	Forecast ³	Actual	Variance	Forecast ³	YTD Actual ⁴	YTD Variance
D-SR-05	79.5	243.9	164.4	111.6	141.4	29.8	113.8	168.5	54.7	116.1	289.0	172.9

Since Hydro One filed this Application, the D-SR-05 program has incurred additional expenditures to respond to new Trouble and Storm events. As of September 30, 2025, year-to-date actual costs in this program, including the Z-Factor event (\$187.0M), are approximately \$172.9M greater than the full-year forecast.

b) The D-SR-05 program costs in base rates are shown in the “Forecast” column of the table in part a) above and further explained in footnote 2.

c) and d)

¹ This program was categorized as D-SR-07 in 2022 as outlined in EB-2017-0049.

² This reflects the impact of Derecho storm, which happened in May 2022

³ In December 2022, Hydro One revised the capital expenditure and ISA forecast on a multi-year envelope and OEB-category basis to implement the OEB-approved Settlement proposal (the “Forecast”). This allocated the impact of the Settlement Proposal to the project and program level.

⁴ Year-to-date Actual and Variance, updated to September 30, 2025. Previously by July 31, 2025: Actual \$271.9M and Variance \$155.8M

Table 1 - Peterborough RZ Trouble Call and Storm Damage Program (D-SR-05) Capital Expenditures (\$M) ⁵

	Capital Expenditures – 2022			Capital Expenditures - 2023			Capital Expenditures - 2024			Capital Expenditures (\$M) - 2025		
Program	Forecast	Actual	Variance	Forecast	Actual	Variance	Forecast	Actual	Variance	Forecast	YTD Actual ⁶	YTD Variance
D-SR-05	0.12	12.9 ⁷	12.8	0.33	0.1	-0.23	0.34	0.3	-0.04	0.34	8.0	7.7

Table 2 - Orillia RZ Trouble Call and Storm Damage Program (D-SR-05) Capital Expenditures (\$M) ⁵

	Capital Expenditures – 2022			Capital Expenditures - 2023			Capital Expenditures - 2024			Capital Expenditures - 2025		
Program	Forecast	Actual	Variance	Forecast	Actual	Variance	Forecast	Actual	Variance	Forecast	YTD Actual ⁶	YTD Variance
D-SR-05	0.05	0.2 ⁷	0.2	0.07	0.2	0.1	0.07	0.2	0.1	0.07	2.0	1.9

As of September 30, 2025, year-to-date actual costs for Orillia and Peterborough RZs in this program, including the Z-Factor event, are approximately \$7.3M and 1.9M greater than the full-year forecast.

⁵ EB-2018-0242, Post-application filing: HONI_OPDC_PDI_DSP Section 5-01-Appendix 2-AA and 2-AB_20221130

⁶ Year-to-date Actual and Variance, as of Sept 30, 2025

⁷ This reflects the impact of Derecho storm, which happened in May 2022.

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VULNERABLE ENERGY CONSUMERS COALITION INTERROGATORY - 11

Reference:

Exhibit A-6-1, Page 21

Interrogatory:

Please provide Table 10 on the basis of rate zones.

Response:

Table 10 - Total Capital Expenditures by Asset Class and by Rate Zone (\$M)

Asset Class	Hydro One Distribution	Peterborough Rate Zone	Orillia Rate Zone	Total
Poles, Towers, and Fixtures	\$86.9	\$4.3	\$1.0	\$92.2
Overhead Conductors and Devices	\$54.9	\$3.1	\$0.8	\$58.9
Lines Transformer	\$45.1	\$0.0	\$0.0	\$45.1
Total	\$187.0	\$7.4	\$1.8	\$196.2

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**VULNERABLE ENERGY CONSUMERS COALITION
INTERROGATORY - 12**

Reference:

Exhibit A-6-1, Page 21

Interrogatory:

Please add 2022 data to Table 11.

Response:

Table 11 - Hydro One Distribution Rate Zone Asset Removal Costs (\$M)

2022		2023		2024		2025	
OEB Approved	Actual	OEB Approved	Actual	OEB Approved	Actual	OEB Approved	Forecast ¹
\$70.1	\$73.6	\$72.1	\$68.9	\$72.0	\$87.1	\$77.0	\$100.1

¹ The 2025 forecast of Asset Removal Costs has been updated and represents amounts incurred YTD as of September 30, 2025, and includes the Asset Removal Costs associated with the Z-factor event

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1 **VULNERABLE ENERGY CONSUMERS COALITION**
2 **INTERROGATORY - 13**
3
4

5 **Reference:**

6 Exhibit A-6-1, Page 23
7

8 **Preamble:**

9 Hydro One crews, contractors and mutual aid partners responded to the storm.
10

11 **Interrogatory:**

12 a) Please complete the following Table. In the response define "Other" costs.
13

	Internal Resources	Third-Party Contractors	Mutual Aid Partners
Labour Hours - Regular			
Labour Hours - Overtime			
Labour \$ - Regular			
Labour \$ - Overtime			
Materials \$			
Equipment \$			
Vehicles \$			
Sub-contractor \$			
Other \$			
TOTAL \$			

14 b) Please provide Hydro One's overtime policy with respect its non-union employees and
15 management.

16
17 c) Please confirm regular wages and base salaries for Hydro One are excluded from the
18 Z-factor claim. If not, please explain.

19
20 d) Please explain the nature of the restoration efforts undertaken by Hydro One crews,
21 compared to contractors and mutual aid partners.

Response:

a)

Table 1 - Breakdown of Z-Factor Costs (\$M)

	Internal Resources	Third-Party Contractors ^{1,2}	Mutual Aid Partners ^{1,2}	Total
Labour Hours - Regular	203,309	████████	████████	████████
Labour Hours - Overtime	359,535	████████	█	████████
Labour - Regular (\$M)	29.7	50.0	7.3	86.9
Labour - Overtime (\$M)	51.5	0.5	-	52.0
Materials (\$M)	14.6	2.0	0.1	16.6
Fleet (\$M)	12.8	15.9	1.4	30.2
Sub-contractor (\$M)	-	0.7	-	0.7
Other ^{2,3} (\$M)	6.3	2.8	0.6	9.8
Total (\$M)	114.9	71.8 ⁴	9.4 ⁴	196.1

¹ In cases where a breakdown of labour hours and dollars are not segmented by regular or overtime, all amounts have been recorded as "regular"

² Both Third-Party Contractors and Mutual Aid Partners refer to the mutual aid resources referenced in Exhibit A-01-06 Figure 1

³ "Other" costs include P-Card transactions, sundry expenses, and corporate overhead

⁴ Total of third-party contractor and mutual aid partner costs (\$81.3M) matches Interrogatory I-02-06, Table 2, Row External Contractors

b) Hydro One does not have an overtime policy for non-union employees and management.

c) Confirmed. The Z-Factor claim is not seeking recovery of wages and salaries funded through base rates. See response to Interrogatory Response to I-01-04, OM&A amounts, including staff funded through OM&A budgets are not being sought for recovery in this Application. Hydro One is seeking recovery of capital costs and removal costs associated with the Z-factor event, which exceed the amounts funded through base distribution rates as demonstrated in Exhibit A-06-01, Table 9. The determination of costs sought for recovery in this Application followed Hydro One's capitalization approach, including labour costs as described in Interrogatory Response to I-05-01.

1 d) During storm response efforts, Hydro One triages and assigns work based each
2 team's expertise, available equipment, familiarity with the territory, and the scope of
3 damage and response effort required.

4

5 Typically, Hydro One crews are assigned to complex work as they are experienced
6 with off-road work, climbing, and operating in towns, cities, and bush areas. Hydro
7 One crews are experienced in using specialized equipment and coordinating with
8 internal departments as required. Hydro One crews are assigned helicopter-based
9 operations given their experience with helicopter-based pole setting.

10

11 Contractors are typically assigned to large, defined geographic areas to complete work
12 such as a series of pole replacements. Deployment of contractor resources is also
13 dependent on their available equipment, which may not be suitable for off-road or bush
14 access.

15

16 Support from other utilities is generally assigned to urban or roadside work in our rural
17 areas.

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1 **VULNERABLE ENERGY CONSUMERS COALITION**
2 **INTERROGATORY - 14**
3
4

5 **Reference:**

6 Exhibit A-6-1, Page 25
7

8 **Preamble:**

9 The costs presented in this application for recovery exclude the applicable carrying
10 charges. Hydro One is seeking recovery of carrying charges and will update these
11 amounts during the course of the proceeding, consistent with final OEB approved interest
12 rates applicable to deferral and variance accounts.
13

14 **Interrogatory:**

15 Please provide the amounts sought by rate zone including carrying charges.
16

17 **Response:**

18 The carrying charges for Account 1572 Extraordinary Event Costs up to the end of
19 December 31, 2025 are as follows:
20

21 **Table 1 - Relief Sought and Carrying Charges by Rate Zone (\$M)**

Rate Zone	Relief Sought by Rate Zone	Carrying Charges	Total
Hydro One Distribution	64.3	0.63	64.9
Peterborough RZ	4.0	0.04	4.1
Orillia RZ	1.1	0.01	1.1

22 The carrying charges were calculated using the OEB prescribed interest rates. Hydro One
23 intends to update the carrying charges up to the effective date of 2026 rates in the draft
24 rate order process.

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**VULNERABLE ENERGY CONSUMERS COALITION
 INTERROGATORY - 15**

Interrogatory:

a) Please provide the number of interruptions, number of customer interruptions and number of customer interruption minutes by Cause Code for each of the years 2020 to 2025 for each Rate Zone.

b) Please discuss the trend in Tree Contact interruptions.

Response:

a)

Table 1 - Hydro One Number of Interruptions*

Number of Interruptions	2020	2021	2022	2023	2024	2025 (Jan-Sep)
Adverse Environment	28	38	34	28	58	66
Equipment Failure	11759	11087	10786	11396	10697	8924
Foreign Interference	5739	5478	5263	5204	7019	4862
Human Element	724	649	706	707	207	130
Scheduled	6086	7075	5819	6756	9440	5223
Tree Contacts	8847	8361	7489	7894	9939	7650
Unknown/Other	2115	2256	2245	2573	2689	2285

Table 2: Hydro One Number of Customer Interruptions*

Number of Customer Interruptions	2020	2021	2022	2023	2024	2025 (Jan-Sep)
Adverse Environment	2356	2695	6275	2475	3446	3238
Equipment Failure	1203238	1192007	1300642	1343434	1151346	923651
Foreign Interference	250816	244092	316817	323812	398923	281427
Human Element	151097	149524	159410	204043	95409	54645
Scheduled	587359	541418	506654	669269	672276	454490
Tree Contacts	829196	797763	783403	761889	1016725	696261
Unknown/Other	532272	488537	651875	835610	650906	600975

1 **Table 3: Hydro One Number of Customer Interruption Hours***

Number of Customer Interruptions Hours	2020	2021	2022	2023	2024	2025 (Jan-Sep)
Adverse Environment	14311	11187	34536	9908	7592	74766
Equipment Failure	3209681	3030000	3856849	3859946	3629869	2981133
Foreign Interference	561184	591397	778819	925428	1068661	574630
Human Element	119687	219663	250750	255190	46318	27457
Scheduled	1467248	1207113	1162565	1895299	1741967	1063409
Tree Contacts	4313343	3919624	3678904	3441636	4327921	3550539
Unknown/Other	492127	431896	538392	626405	573867	596976

2 *The Peterborough and Orillia acquisition occurred mid-2021. As such, full year results for
 3 these two Rate Zones are included above from 2022 onwards.

4

5 b) The trend for the Number of Interruptions for Tree Contacts has been declining since
 6 2020. However, due to increased storm days in 2024, including 48 storm days
 7 compared to the 10-year historical average of 34 storm days per year, higher
 8 interruptions due to tree contacts were recorded. Data for 2025 is only provided to
 9 September month-end. Therefore, it is not comparable to prior years.

10

Tree Contacts Trend:	2020	2021	2022	2023	2024	2025(Jan-Sep)
Number of Interruptions	8,847	8,361	7,489	7,894	9,939	7,650
Number of Customer Interruptions	829,196	797,763	783,403	761,889	1,016,725	696,261
Number of Customer Interruptions Hours	4,313,343	3,919,624	3,678,904	3,441,636	4,327,921	3,550,539

1 **VULNERABLE ENERGY CONSUMERS COALITION**
2 **INTERROGATORY - 16**

3
4 **Reference:**

5 Exhibit A-6-1, Attachment 3, Page 4

6
7 **Preamble:**

8 The Major Events response states “A comprehensive internal After-Action Review is
9 currently underway to drive improvements across processes, people, and technology. This
10 review will enhance our operational procedures, strengthen team capabilities, and
11 upgrade data systems to deliver more accurate, customer-focused information and ensure
12 more effective response and communication during future incidents.

13
14 **Interrogatory:**

- 15 a) Please provide the status of the review. If completed, please provide a copy of the
16 review.
- 17
- 18 b) If still in progress, please provide the preliminary findings from the review including
19 recommended improvements.

20
21 **Response:**

- 22 a) The internal After-Action Review referenced in the major Events Response Report is
23 still underway.
- 24
- 25 b) While the review in part a) is underway, Hydro One has identified and prioritized
26 process improvement actions. The key preliminary findings and improvement actions
27 resulting are summarized below:
- 28
- 29 • **Strengthening Large-Scale Response Readiness:** Hydro One maintains robust
30 emergency response procedures and regularly trains staff to support coordinated
31 and safe restoration efforts. The Z-Factor event was Hydro One’s first Level 3
32 emergency response and involved damage and impacts that exceeded the scale
33 of previous large storms. As part of the review, Hydro One is considering how its
34 existing processes can be further enhanced to operate effectively at this highest
35 level of emergency severity. This work includes validating escalation protocols,
36 confirming resource deployment pathways, and reinforcing cross-functional
37 coordination practices.

- 1 • **Enhanced Training and Support for Emergency Operations Roles:**
2 Hydro One currently delivers established training for Emergency Operations
3 Centre position holders and field leadership roles. The review has identified
4 opportunities to enhance training and clarify roles during extended, high-intensity
5 events. Enhancements under development, and building on Hydro One's current
6 approach, include more frequent and scenario-based training exercises, clarifying
7 positions that require rotational back-up during long duration events, and
8 managing workload fatigue.
9
- 10 • **Community and Partner Coordination:** Hydro One has longstanding
11 relationships with municipal emergency management officials and participates in
12 regular coordination meetings to support information sharing, emergency
13 preparedness, and planning. During the Z-Factor event, these partnerships
14 supported response activities; however, the scale and geographic distribution of
15 the impacts highlighted opportunities to further enhance real-time coordination
16 during major emergencies. As part of the review, Hydro One is assessing
17 improvements such as establishing additional liaison pathways and, where
18 appropriate, deploying Hydro One representatives directly into municipal
19 Emergency Operations centers during large-scale events to improve local
20 communication, better align situational awareness, and assist with coordinated
21 public messaging.
22
- 23 • **Customer Information and Outage Communications:** During emergency
24 responses, Hydro One provides outage information through its online outage map,
25 call centre updates, and public messaging. Hydro One is reviewing opportunities
26 to enhance the public outage map and associated communication channels to
27 provide more specific, timely, and easily interpretable updates.

1 **VULNERABLE ENERGY CONSUMERS COALITION**
2 **INTERROGATORY - 17**

3
4 **Reference:**

5 Exhibit A-6-1, Attachment 3, Page 4

6
7 **Preamble:**

8 The following utilities provided the assistance: Alectra Utilities, Algoma Power, Bluewater
9 Power, Burlington Hydro, CanadianNiagara Power (Fortis), Elexicon Energy, Enova
10 Power, ENWIN Utilities, EPCOR, EARTH Power, ESSEX Powerlines, GrandBridge Energy,
11 GreaterSudbury Hydro, Hydro Ottawa, London Hydro, Milton Hydro, Oakville
12 Hydro, Orangeville Hydro, PUC Services, Toronto Hydro, and Utilities Kingston,
13 CentreWellington Hydro, Lakefront Utilities, NPEI, Oshawa PUC, Ottawa River
14 Power, Renfrew Hydro, Wasaga PUC, Wellington North Power, and Westario Power.
15 In addition to the distributors listed, Hydro One received assistance from Hydro Quebec
16 and NB Power as well.

17
18 **Interrogatory:**

19 Please provide a schedule that sets out the payments made to each utility.

20
21 **Response:**

22 A completed list of the utilities and mutual aid partners that participated in storm response
23 efforts is provided in response to Interrogatory I-01-05 part a).

24
25 Hydro One has provided a list of payments made to each utility and mutual aid partner in
26 Table 1. At this time, the specific names of the utility partners have not been attributed to
27 the payment amounts as Hydro One had not had sufficient time to notify each participating
28 utility that the payment amounts will be publicly disclosed as part of this proceeding.

1

Table 1 - Payment by Utility and Mutual Aid Partners

Utility	Sum of payout (pre-tax) \$M
Utility 1	2.26
Utility 2	2.13
Utility 3	1.02
Utility 4	0.74
Utility 5	0.46
Utility 6	0.40
Utility 7	0.37
Utility 8	0.34
Utility 9	0.33
Utility 10	0.32
Utility 11	0.26
Utility 12	0.25
Utility 13	0.19
Utility 14	0.16
Utility 15	0.15
Utility 16	0.15
Utility 17	0.14
Utility 18	0.13
Utility 19	0.12
Utility 20	0.11
Utility 21	0.10
Utility 22	0.09
Utility 23	0.08
Utility 24	0.08
Utility 25	0.08
Utility 26	0.07
Utility 27	0.05
Utility 28	0.04
Utility 29	0.03
Utility 30	0.02
Utility 31	0.01
Grand Total	\$10.70 M

2 The table above outlines the gross pre-tax payments made to utilities that supported Hydro
 3 One's efforts during the Z-Factor Event. The majority of these payments (\$9.4 million, as
 4 referenced in Interrogatory I-05-13 part a)) were classified as net capital expenditures,

1 with the remainder allocated to removal costs, in accordance with Hydro One's accounting
2 policy.

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1 **VULNERABLE ENERGY CONSUMERS COALITION**
2 **INTERROGATORY - 18**

3
4 **Interrogatory:**

5 Please provide the percentage of underground versus overhead for each Rate Zone.

6
7 **Response:**

8 Hydro One, Orillia, and Peterborough are 91%, 69%, and 67% overhead respectively.
9 Please note that 100% of the assets replaced in each Rate Zone in relation to the Z-Factor
10 event were overhead assets.

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