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November 7th, 2025

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

**Re: Wasaga Distribution Inc. – EB-2025-0254
Service Area Amendment Application
Interrogatory Responses**

Dear Mr. Murray,

In accordance with Procedural Order No. 2, please find enclosed Wasaga Distribution Inc.'s responses to Interrogatories as part of our Service Area Amendment Application. A full copy has also been uploaded electronically and distributed to all intervenors.

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

Respectfully Submitted,

A. Karamatic

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Wasaga Distribution Inc.

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Ontario Energy Board (OEB) Interrogatories

OEB Staff-1

Ref 1: [Filing Requirements for Service Area Amendment Applications](#), March 12, 2007

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

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

1. Please describe the potential cost implications and community disruptions that could result from having duplicate facilities.
2. Please describe how the construction of new facilities by HONI on the subject land, would limit WDI’s ability to plan and evolve its future system in the area.

RESPONSE

For clarity, “duplicate infrastructure” refers to new electrical facilities built by HONI that replicate the function of WDI’s existing assets without adding reliability, capacity, or operational value. This includes:

- HONI’s proposed pole line that would strand WDI’s existing section along Morgan Road.
 - HONI’s design that bypasses WDI’s upgraded portion of Morgan Road, which was purpose-built mainly for redundancy, broader system planning needs, and looped feeds.
1. Cost Implications: If WDI were required to abandon its existing pole line along Morgan Road, the following direct costs would be incurred:
 - Pole and Hardware Removal: Labor and equipment costs to dismantle approximately 470 meters of overhead line, including poles, crossarms, and associated hardware.
 - Conductor and Material Disposal: Safe removal and disposal of conductors and other materials in compliance with environmental regulations.
 - Restoration Costs: Backfilling and restoration of disturbed areas to municipal standards.
 - Estimated Range: Based on historical unit costs, removal and disposal could range from \$5,800 to \$6,000, depending on site conditions and disposal requirements.

Community Disruptions:

i. During construction:

Impact Area	Scenario 1: WDI Upgrades Existing Pole Line	Scenario 2: HONI Builds New Line & WDI Removes Existing
Traffic & Access	Single phase of lane closures. Short duration.	Two separate phases: HONI construction + WDI removal. Extended or repeated closures.
Noise & Dust	Moderate noise and dust during upgrade.	Double disturbance: noise and dust during both build and removal.
Duration	Shorter overall timeline (one project).	Longer timeline due to two distinct projects and coordination delays.
Safety Risks	Standard construction hazards for one phase.	Increased exposure to hazards over two phases; more equipment and crews.
Community Confusion	Clear communication - one utility doing work.	Higher confusion: why two utilities, two projects? Risk of complaints.

ii. In a Catastrophic Event (e.g., Ice Storm)

Impact Area	Explanation
Restoration Speed	Two utilities = slower restoration. HONI crews are dispatched from outside the municipality, while WDI has embedded local crews for rapid response. Losing WDI's presence can result in significant delays (i.e. March 2025, Ice Storm)
System Resilience	WDI's urban design includes a loop feed for quick switching and sectionalizing. HONI's rural radial design creates a single point of failure - if the line goes down, the entire subdivision is out until repairs are complete.
Real-World Evidence	During the March 2025 ice storm, HONI customers adjacent to Wasaga Beach faced extended outages, while WDI restored 100% of its system within ~21 hours and assisted HONI afterward. This demonstrates WDI's resilience advantage.
Emergency Coordination	WDI's municipal integration enables coordinated response with local emergency services. HONI's build fragments planning and slows critical response during severe weather events.

2. The construction of new facilities by HONI on the Subject Lands would limit WDI's ability to plan and evolve its system in the following ways:
 - Blocked System Optimization: prevents WDI from completing its planned loop feed to the adjacent subdivision. This reduces resilience and increases outage risk.
 - Municipal Alignment and System Continuity: WDI's infrastructure is already integrated with the Town's growth strategy and emergency response protocols. Continued service by WDI ensures seamless planning, avoids fragmentation, and supports coordinated municipal servicing and emergency management. In contrast, HONI's build would disrupt this alignment, introducing planning inefficiencies and weakening local emergency response capabilities.

OEB Staff-2

Ref 1: [Filing Requirements for Service Area Amendment Applications](#), March 12, 2007

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

Ref. 1, section 7.4.1 states an applicant who brings forward an application where customer choice may be a factor must provide a written statement signed by the customer (which includes landowners and developers) indicating the customer's preference.

WDI states (ref. 2, section 1, p. 4 of 27) "the developers have expressed a clear preference for WDI to serve the subdivision. The Town of Wasaga Beach, as the local municipality, also supports WDI as the logical and efficient service provider."

WDI further states (ref. 2, section 5, p. 20 of 27) that "written confirmation of support has been provided by one developer and is included as part of this application."

As noted in the application, the two developers are Primont (Wasaga 2) Inc. and Sterling Group of Companies. A letter of support for the service area amendment application was only provided by the Sterling Group of Companies.

1. Please submit copies of any letters of support from Primont (Wasaga 2) Inc. and the Town of Wasaga.

RESPONSE

Primont Homes: While WDI does not have a formal letter from Primont, we have email correspondence confirming their preference for WDI as the service provider. Additionally, Primont registered as an intervenor and filed evidence on the public record supporting WDI's position. Please see Appendix A for emails from Primont and their consultant.

Town of Wasaga Beach: The Town's support is evidenced through multiple channels,

including its official presentation at the 2025 AMO Conference (held August 17-20, 2025) advocating for regulatory changes to enable WDI to serve its high-growth areas efficiently. This public advocacy reinforces municipal preference and aligns with the OEB's principle of considering local planning and public interest. A copy of the AMO presentation is attached as Appendix B.

Both forms of evidence demonstrate active engagement and alignment with broader planning objectives, which is more substantive than a single written statement.

OEB Staff-3

Ref 1: [Filing Requirements for Service Area Amendment Applications](#), March 12, 2007

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

Ref. 1, sections 7.3.2 and 7.3.3 requires the applicant to provide a description of any impacts on costs, rates, service quality, and reliability for customers in and out of the area that is the subject of the SAA application that arise as a result of the proposed SAA.

WDI states (ref 2, Section 1, p. 4 of 27) that "WDI's distribution rates are materially lower than HONI's, and WDI consistently outperforms HONI in reliability metrics, ensuring fewer and shorter outages for future residents. These benefits can be delivered without adverse impact to existing customers in either distributor's service area."

1. Please explain the benefits to WDI existing customers if the SAA application is approved. Please provide the supporting analysis for this response.1.
2. What impact would the cost of providing service by WDI to the subject land have on WDI's ratepayers and HONI's ratepayers? Please include the forecast incremental amount in charges to be paid to HONI as the host distributor.
3. What impact would the cost of providing service by HONI to the subject land have on WDI's existing customers?

RESPONSE

1. Approval of the SAA would result in several benefits to WDI's existing customers:
 - **Customer Growth:** The addition of approximately 660 new residential customers represents an estimated 4.45% increase in WDI's customer base. This growth enables WDI to either spread costs over a larger customer base or allocate additional resources to enhance service to existing ratepayers.
 - **Enhanced Investment Capacity:** Growth in customer base directly supports WDI's ability to invest in system improvements and modernization. WDI has historically maintained some of the lowest distribution rates in Ontario, and continued growth is essential to sustaining affordability, while also providing the ability to continue to grow and advance our system.

- **Improved Asset Utilization:** WDI has existing distribution assets adjacent to the Subject Lands, including a feeder tie along Morgan Road, which were constructed as part of long-term system planning for redundancy and would have been built regardless of this specific development. Connecting the new subdivision to WDI's network allows the development to benefit from infrastructure already in place, ensuring efficient use of prior investments.
- **Enhanced System Planning and Reliability:** Integrating the Subject Lands into WDI's service area supports contiguous system planning. The proposed connection enables WDI to complete a looped feed configuration, improving fault tolerance and reducing outage durations. WDI's 2023 SAIDI and SAIFI metrics (0.66 hours/year and 0.73 interruptions/year, respectively) significantly outperform HONI's (~7.5 hours/year and ~2.8 interruptions/year).
- **Municipal Coordination and Emergency Response:** WDI's embedded field crews and strong municipal ties enable faster restoration and coordinated emergency response, which benefits the broader community, including existing customers.
- **Cost savings:** Existing ratepayers will be future ratepayers and will benefit from reduced costs on any additional streetlights or other community-owned assets that may be required in this service area.
- **Avoidance of community confusion,** creating multiple systems in an area where there the local government is accountable – this could have the potential to create very tense situation.

2. Impacts on the cost of WDI and HONI ratepayers if the Subject Lands were serviced by WDI would include:

- WDI can serve the Subject Lands using existing infrastructure with minimal upgrades. The forecasted load of 2.1 MW can be accommodated without upstream investment.
- Charges to HONI as Host Distributor, as an embedded distributor, WDI will continue to pay upstream delivery charges to HONI for electricity supplied to the new customers. Based on HONI's current rates (as set out in EB-2024-0032, December 19, 2024) and the estimate that the Subject Land will peak at approximately 2.1MW, WDI forecasts incremental costs of ~\$273K per year to be paid to HONI. Calculated as follows (excluding supply line losses):

2025 HONI Rates		Anticipated kW	Total Cost
Common ST Lines	1.7096	2,100	3,590
Trans Connection	3.4894	2,171.40	7,577
Network	5.3280	2,171.40	11,569
Total Cost for One Month			22,736
Total Cost for One Year			\$ 272,835

- **Future Costs:** Total assumed future costs are based on WDI's current OM&A per customer of \$272.74, which will provide WDI with the resources needed to continue evolving and modernizing its system.
- **Impact on HONI:** WDI does not foresee any additional cost to HONI beyond the

removal of the temporary service.

3. The impacts on costs of WDI ratepayers if the Subject Lands were serviced by HONI would include:
 - **Lost Opportunity for System Optimization:** WDI would lose the opportunity to complete a loop feed and integrate the subdivision into its network, which would reduce system efficiency and reliability for adjacent WDI ratepayers. This would be contrary to the OEB’s principle of rational optimization of distribution systems (Filing Requirements, Section 7.2).
 - **Limit Growth:** WDI would not gain new customers or revenue from the development. This could result in less favorable cost recovery for existing ratepayers.
 - **The municipality, as an existing ratepayer would be subject to substantially higher rates if serviced by HONI rather than WDI.**
 - **Stranded Assets for WDI:** WDI’s infrastructure along Morgan Road would be bypassed, resulting in stranded assets and loss of corridor rights. This could lead to real costs for removal and disposal, and limit WDI’s future planning flexibility.

OEB Staff-4

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

WDI states (ref 2, section 3.1, p. 13 of 27) that “HONI’s proposed radial connection would introduce a single point of failure, significantly increase outage exposure, and add infrastructure without adding system value.”

1. Please explain and justify the last part of this statement “add infrastructure without adding system value” and its relevance to providing service to the subject area.

RESPONSE

HONI’s proposed build runs contrary to promoting economic efficiency, rational optimization of distribution systems, and alignment with public interest. It adds cost and physical plant without improving reliability, planning flexibility, or community integration. The duplication fragments municipal coordination and undermines cohesive planning - hence, “limited system value.

The following points illustrate why HONI’s infrastructure proposal lacks system value in context of the Subject Lands:

- **No Reliability Gain:** HONI’s proposed radial line introduces a single point of failure and does not improve redundancy or outage restoration capability. It adds poles and wires but leaves customers more vulnerable to prolonged outages.
- **Bypasses Existing Assets:** WDI already has upgraded infrastructure adjacent to the site, designed for future growth and looped feeds. HONI’s build ignores these assets, creating duplication instead of leveraging prior investments.

- No Operational Efficiency: HONI's facilities would not integrate with WDI's urban network or municipal coordination processes, increasing complexity without improving reliability or cost efficiency.
- Community Impact: WDI's infrastructure supports unified planning and local accountability. HONI's duplication fragments this cohesion, creating confusion for residents and weakening coordinated municipal services.

OEB Staff-5

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

WDI states (ref. 2, section 6.1.3, p. 23 of 27) that it "has proximate, upgraded distribution infrastructure available to serve the Subject Lands without the need for upstream investment."

1. Please identify the upstream investments that WDI has already made to supply the subject area and connect the developers.
2. Please include the original capital cost and current depreciated amount of the investments made by WDI to supply the subject area.
3. Please identify when the recently upgraded infrastructure to serve the subject area was installed.
4. Please provide the amount that WDI ratepayers have paid to date on a fully allocated basis, i.e. including capital, operating and depreciation expenses for the investments made that will supply the subject area.

RESPONSE WDI does not require upstream investments related to supplying the Subject Lands. Contrary to HONI's assertion, WDI did not construct Municipal Station #6 (MS#6), nor undertake the Morgan Road Feeder Tie, for the purpose of serving the Subject Lands at 400 45th Street South. These projects were initiated before the current development was proposed and were driven by broader system planning needs, including redundancy, load balancing, and could support future growth across multiple subdivisions.

WDI can also serve the Subject Lands from MS#3, built in the late 1970's, which remains a viable option. WDI elected to use MS#6 in our application to optimize asset utilization and defer upstream investment, not because MS#6 was built specifically for this development. WDI has multiple options available from its urban designed system that are not related to MS#6 nor Morgan Road.

The following clarifies the purpose and timing of the relevant infrastructure projects:

- **MS#6** was planned and commissioned in 2022 to meet anticipated load growth from the Sunnidale Trails and River's Edge subdivisions. In addition, It was designed with a 10 MVA transformer and four feeders to provide backup and transfer capability between existing stations, including MS#3. The station was not built for the Subject Lands, but to support long-term growth and system resilience.
- **Morgan Road (New Station Backup – Overhead)** (Feeder tie phase 1) was constructed as a three-phase 8 kV tie between MS#3 and MS#6, enhancing redundancy and load distribution. This project was part of a broader feeder-rated tie strategy initiated in 2022 and was not targeted at the Subject Lands.
- **Morgan Road** (Feeder tie phase 2) involved replacing aging infrastructure and installing new conductors and switchgear to complete the circuit between MS#3 and MS#6. These upgrades improve fault tolerance and load transfer capabilities across WDI's network and were planned independently of the current SAA application.

WDI's infrastructure investments reflect prudent planning and responsible asset management. The decision to serve the Subject Lands from MS#6 is consistent with WDI's mandate to deliver reliable, cost-effective service using existing resources. It is not, as HONI suggests, a targeted attempt to expand service territory, but rather a logical extension of WDI's existing network and planning framework.

The original capital cost of the investment made by WDI for Morgan Road Feeder Tie was \$848,728. At the end of 2024, these assets have depreciated a total of \$42,854. These projects/costs were approved in our 2024 COS.

OEB Staff-6

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

WDI states (ref. 2, section 3, p. 12 of 27) the "subdivision is progressing through the municipal approval process, including civil design and the preparation of Composite Utility Plans (CUPs), during which distributors are expected to resolve potential utility conflicts and confirm servicing requirements."

1. Please explain the Composite Utility Plans process and specifically identify all of the participants in that process.
2. Please confirm whether HONI participated or was asked to participate in the preparation of the Composite Utility Plans.

RESPONSE

1. The Composite Utility Plans (CUPs) process is a coordinated planning activity undertaken during the municipal approval phase of a development. Its purpose is to ensure that all utilities - electricity, gas, water, telecommunications, and others - can be installed efficiently and without conflict in shared corridors such as road allowances and easements.

During CUP preparation:

- Utilities submit their proposed servicing layouts.
- Conflicts in alignment, depth, and spacing are identified and resolved.
- The CUP is finalized to guide construction and ensure safe, efficient installation of all services.

Participants in the CUP process typically include:

- The developer and their civil engineering consultants.
- The Town of Wasaga Beach including planning and public works departments.
- All servicing utilities, including:
 - WDI
 - Enbridge Gas
 - Rogers, Bell, or other telecom providers

The CUP process is critical for confirming servicing requirements and avoiding costly redesigns after municipal approvals or construction delays.

2. WDI cannot confirm HONI's participation in CUP preparation for this or other Wasaga Beach projects.

OEB Staff-7

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

WDI states (ref 2, section 3.4, p. 14 of 27) that “abandoning this infrastructure would impose direct costs on WDI, including removal and disposal expenses. More critically, it would undermine corridor rights that support future service opportunities and long-term planning.”

1. What are the direct costs that would be imposed on WDI and its ratepayers?
2. Please explain and provide support for the statement that the failure to get approval to serve the subject area would affect WDI's corridor rights and long-term planning.

RESPONSE

1. See OEB Staff-1 (1)
2. See HONI-11 and HONI-12.

OEB Staff-8

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

WDI states (ref 2, section 3.6, p. 16 of 27) that it “already maintains upgraded infrastructure along Morgan Road, supported by existing capacity on Feeder 1 from Municipal Station #6,

with Feeder 4 from Municipal Station #3 available as a backup. The projected 2.1 MW load of the proposed subdivision can be accommodated with minimal upstream investment.”

1. Does WDI expect to upgrade Feeder 1 and Feeder 4 to serve the subject area after the residential development is completed?
2. What are WDI’s expected costs for the upgrades and how will this cost be recovered?
3. Has WDI engaged HONI to determine if the additional demand at MS#6 would require any investments by HONI to its system?

RESPONSE

1. No.
2. N/A.
3. WDI has actively engaged HONI through the regional planning process and attempted direct discussions regarding WDI’s overall system growth and planning requirements. Despite these efforts, HONI has consistently advised that detailed discussions would only occur after WDI commits to specific load growth timelines. WDI is cautious to make such commitments because development build-out rates and market conditions are outside WDI’s control and cannot be predicted with sufficient accuracy. Committing prematurely would introduce risk and potentially result in misaligned investment and stranded assets, contrary to the OEB’s principles of economic efficiency and rational system planning.

WDI remains committed to working collaboratively with HONI. Our intent has always been to ensure transparent coordination and alignment with regional planning objectives, consistent with the OEB’s principles of economic efficiency and rational optimization of distribution systems.

OEB Staff-9

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

WDI states (ref. 2, section 4.1.5, p. 18 of 27) the “load is minimal and not permanent, the impact on HONI in terms of lost revenue is negligible.”

1. Please explain this statement and provide evidence to support your statement.

RESPONSE

The statement refers to the temporary electrical connection currently in place on the Subject Lands, which serves only a sales office and does not represent a long-term customer. The lands are vacant and undeveloped, with no permanent electricity customers and no

permanent infrastructure installed by HONI.

The existing load is minimal, the connection is temporary, and HONI has no permanent infrastructure on the Subject Lands. Therefore, the impact on HONI's revenue is negligible, and the proposed Service Area Amendment would not adversely affect HONI's financial position or current customer base.

OEB Staff-10

Ref 2: WDI Service Area Amendment Application, August 19, 2025

WDI states (ref. 2, section 4.2.4, p. 20 of 27) that WDI "will serve the customer directly using existing infrastructure within its service area, which will be upgraded as necessary." However, (ref. 2, section 3.7, p. 16 of 27) WDI states "as part of the connection, WDI will upgrade a short section - approximately five poles - along the remaining segment of the Morgan Road corridor."

1. Does WDI plan to install the five poles along the Morgan Road corridor before or after the residential development begins, to provide service to the subject area?
2. Please identify the impacts on WDI's ratepayers resulting from the upgrade of a short section of the Morgan Road corridor, which involves the installation of five new poles.
3. Please identify the impacts to HONI's ratepayers resulting from WDI upgrading the short section of the Morgan Road corridor, which involves the installation of five new poles.

RESPONSE

1. WDI plans to complete the Morgan Road reinforcement (approximately five existing poles) in coordination with the development timeline, not before construction begins. The timing will depend on subdivision phasing and actual load requirements. It is possible that Phase 1 of the development could be served using the existing infrastructure without an upgrade, depending on actual load requirements. Reinforcement will be implemented only when required to maintain reliability and capacity as the subdivision builds out. This approach avoids premature investment and aligns with the OEB's principle of economic efficiency by matching infrastructure upgrades to actual demand.
2. This work is consistent with WDI's responsibilities as an embedded distributor and does not involve upstream investment or expansion beyond WDI's licensed service area. Therefore, WDI ratepayers are kept whole (little to no impact on ratepayers), and the upgrade aligns with the OEB's principles of economic efficiency and rational system planning.
3. From WDI's perspective, there are no direct impacts on HONI's ratepayers resulting from this upgrade. HONI has no infrastructure on the Subject Lands, no assets are being transferred or stranded, and HONI's customer service obligations remain unaffected.

HONI will continue to receive upstream delivery charges from WDI for electricity supplied to the new customers. As such, the upgrade has no adverse financial or operational impact on HONI's ratepayers.

OEB Staff-11

Ref 2: WDI [Service Area Amendment Application](#), August 19, 2025 Ref 3: WDI [Supplementary Evidence](#), October 27, 2025

WDI presented a table (ref. 2, section 6.1.3, p. 22 of 27) that it indicates “provides an apples-to-apples comparison of WDI and HONI cost estimates, isolating comparable components to highlight the true cost differences when scope differences are accounted for.”

WDI has asserted that it is not in a position to provide a Discounted Cash Flow (DCF) analysis (ref 3. Section 3, p. 4 of 11) for the expansion and connection of the development.

1. Please provide any further details on the basis for this cost comparison, including an explanation of the basis for this comparison and include any documents and or meeting notes referred to in your response.
2. Please provide a description of the information necessary to complete a DCF analysis that WDI has not received from the developer.
3. What information has WDI provided to the developer to support its assessment of the costs of connecting to WDI's system? Please provide supporting documentation for any calculations.
4. If possible, please estimate the amount, if any, the developer is expected to be required to pay, towards the connection? If so, please provide that estimate with details of the calculations.

RESPONSE

1. The cost comparison presented in Section 6.1.3 of WDI's application was developed solely to respond to Hydro One's request for a cost assessment during a meeting on March 6, 2024. At a subsequent meeting on March 5, 2025, HONI indicated that the distributor with the most economical connection estimate should be selected to serve the development.

WDI prepared a preliminary design and cost estimate based on conceptual site drawings provided by the developer. This estimate included all costs to install the electrical distribution system expansion for the development, including civil works and inspection. The disclosure of related costs was halted once WDI realized the two distributors were not costing out the same scope of work. To ensure comparability, WDI later adjusted its estimate to exclude civil and inspection costs, aligning scope with HONI's approach.

No formal documents or meeting minutes were exchanged; WDI's internal notes from

the meeting form the basis of the comparison. The table in Section 6.1.3 of the application summarizes the scope differences and adjusted cost estimates. WDI undertook this process in good faith to support transparency and provide an objective basis for assessing economic efficiency.

2. WDI had not completed a DCF analysis because the development is still in the Subdivision Plan Approval stage, and key inputs are unavailable, including:
 - Finalized lot fabric and phasing schedule (e.g., whether build-out occurs over 5, or longer).
 - Detailed civil design and confirmed connection points.
 - Customer class mix and timing of energization for each phase.

Without these details, any DCF analysis would be speculative and risk misaligned investment, contrary to the OEB’s principles of economic efficiency and rational system planning.

3. See HONI-1 (e) for communications with the developers.
4. Based on preliminary estimates, standard “beneficiary pays” principles proposed by HONI’s interpretation (civil work should be excluded from the cost estimate), WDI anticipates the developer will contribute approximately ~\$1.1 million (\$2,634,904 including civil costs) for a full build-out scenario over five years of \$1,700/lot (\$3,992/lot including civil costs). These figures are indicative only and subject to change once detailed design and phasing information are available. The contribution will be calculated in accordance with the Distribution System Code and WDI’s approved connection processes. The table below provides a cost comparison summary, considering both the standard and alternative “beneficiary pays” approach:

Cost Comparison Summary						
Option	Cost to Construct	Civil Costs	Total Development Costs	Developer Contribution	Utility Contribution	Break-Even Customer Rate
WDI Beneficiary Pay - Standard	\$2,181,646	\$1,502,683	\$ 3,684,329	\$ 2,634,904	\$ 1,049,425	\$39.45 / month
WDI Beneficiary Pay - Alternative	\$3,684,329	n/a	\$ 3,684,329	\$ 2,260,876	\$ 1,423,453	\$50.35 / month
HONI Beneficiary Pay - Standard	\$2,264,834	\$1,640,000	\$ 3,904,834	\$ 1,640,000	\$ 2,264,834	n/a

The break-even customer rate represents the revenue level at which no developer contributions would be required - in other words, where developer contribution would equal zero.

Furthermore, WDI has prepared a 40-year lifecycle cost comparison:

40-Year Lifecycle Cost Comparison (Discounted Cost/Per Lot)				
		[A]	[B]	[A] - [B]
Category	WDI Served Standard	WDI Served Alternative	HONI Served Standard	Comparison Difference
Developer contribution/lot	\$3,992	\$3,426	\$2,485	\$941
Discounted cost to future ratepayer(s)/lot	\$7,740	\$7,740	\$16,688	-\$8,948
Discounted cost to WDI/lot for host fees	\$1,329	\$1,329	-	\$1,329
Discounted cost to future ratepayer - Streetlighting	<i>Unknown at this time— HONI SL service charge would be ~55% higher than WDI</i>			

The 40-year lifecycle cost comparison calculations are based off of the following assumptions:

1. Using Developer Contributions from Cost Comparison Summary, and dividing by 660 lots
2. Discount Rate: 6.16% WACC approved in WDI's Cost of Service (EB-2023-0055)
3. Inflation Rate Applied to Rates: 2%
4. January 1, 2025 rates and tariffs for HONI and May 1, 2025 rates and tariffs for WDI, discounted cost to future ratepayer including low voltage charge for WDI, assuming 750 kWh/lot

For further calculation details, see Appendix C – Discounted Cash Flow Summary

OEB Staff-12

Ref 3: WDI [Supplementary Evidence](#), October 27, 2025

WDI states (ref 3. section 1, p. 3 of 11) “WDI has been very clear - and has communicated this directly to HONI on multiple occasions - that it has always understood 400 45th Street would revert back to WDI’s licensed service territory if it was ever developed.”

1. Please explain this statement, including, without limitation, the basis for WDI’s understanding; and provide documentation to support the statement that WDI has communicated to HONI its view that the subject area “would revert back to WDI’s licensed service territory”.
2. Please clarify the terms of the arrangement between WDI and HONI when the subject area was transferred to HONI. Please provide any documentation to support the terms of the arrangement.

RESPONSE

WDI’s understanding that 400 45th Street would revert to its licensed service territory upon development was based on corporate knowledge and interpretation of its distribution license

boundaries, which include the Town of Wasaga Beach. Historically, WDI served the property under a load transfer arrangement prior to the OEB-directed elimination of long-term load transfers (EB-2016-0207).

WDI communicated this understanding to HONI on multiple occasions, including informal discussions and correspondence. As supporting documentation, WDI refers to the letter from WDI to the OEB and the OEB's response during the EB-2016-0207 proceeding, which confirmed that WDI could file a Service Area Amendment application. While the correspondence did not specifically reference 400 45th street, it pertain to that property. The letter is provided in Appendix D. In addition, in Appendix E, WDI has attached a letter submitted to its Account Executive at HONI in regards to this Service Area Amendment.

The transfer of the Subject Lands to HONI occurred under the OEB's regulatory directive to eliminate load transfers, not through a negotiated agreement. No separate contractual terms exist beyond what was mandated by the OEB.

Hydro One Networks Inc. (HONI) Interrogatories

HONI-1:

References:

1. "The developers have expressed a clear preference for WDI to serve the subdivision" – p. 4 of 27 of the WDI SAA application
2. "the developers have indicated a preference for WDI to provide service to the subject lands. One developer has formalized this preference in writing, with a letter included in this application, demonstrating alignment with the OEB's principle that customer preference is a relevant factor in service area amendments" – p. 9 of 27 of the WDI SAA application
3. "the developers have expressed support for the proposed amendment, with written consent provided by one party." – p. 20 of 27 of the WDI SAA application
4. "the developers have expressed a clear preference for WDI to provide electrical service to the subject lands. Written confirmation of support has been provided by one developer and is included as part of this application. Their preference is based on alignment with the town's approval processes, proximity to WDI's existing facilities, and anticipated efficiencies in servicing the development" – p. 20 of 27 of the WDI SAA application
5. "the sole current affected customer is the developer of the subject lands, who has expressed a preference to be served by WDI. The decision on this application will also impact future residential customers who will purchase and occupy homes within the development." – p. 17 of 27 of the WDI SAA application
6. Sterling group of companies letter dated jan 30, 2024 - schedule c, of the WDI SAA application

7. “while the economic evaluation (or discounted cash flow analysis) is generally the most accurate reflection of future ratepayers’ interests, its reliability diminishes in the context of relationships between host and embedded distributors. In such cases, reliance on this methodology can result in an inefficient and costlier build out of a distribution system”. – p. 6 of 11 of WDI supplementary evidence
8. “with respect to 400 45th street - the OEB must decide: 100% of developer costs, paid for as described by HONI, based on the principles defined in this proceeding is in the best interest of public interest. In fact, utilities should always have paid 100% of this infrastructure (excluding upstream), because at the end of the day – utilities, like WDI need to replace it and some of the challenges we face today are from decisions made in the past, without the appropriate foresight”. – p. 6 to 7 of 11 of WDI supplementary evidence

Interrogatory:

- A) Please confirm that the letter dated January 30, 2024, as detailed at reference 2 and 6, is the most current letter provided by the developer, the sterling group of companies.
- B) Please confirm the letter noted in question a), above, remains the position of the endorsing developer and when WDI last confirmed this position with the developer.
- C) Please clarify when WDI was first made aware of the potential development of the subject area. If WDI became aware in writing, provide a copy of the communication.
- D) Please provide any documentation or information sent by WDI to the developer (in reference 6) prior to January 30, 2024, regarding this connection and the dates those details were shared. If the documentation or information was shared in meetings (prior to January 30, 2024), please include the meeting dates.
- E) With respect to the other developer in reference 2, Primont, that has now formalized their preference in writing through their registered intervenor request, please provide any documentation or information sent by WDI to this developer regarding this connection and the dates those details were shared.
- F) Please confirm what cost documentation was provided to the sterling group of companies to secure the letter provided at reference 6. Please provide what the cost estimate was predicated on.
- G) At reference 7, please confirm what cost responsibility WDI conveyed to each developer for civil works and whether the developers were shown cost alternatives.
- H) With respect to reference 7, please detail how WDI being an embedded utility has any bearing

on conveying to the developer how much of the connection they will be cost responsible for versus how much of the connection cost will be the responsibility of existing WDI ratepayers?

- I) At reference 8, please identify the specific infrastructure that 'utilities should always have paid 100% of this infrastructure (excluding upstream)'. Please explain the reason upstream investment is excluded and WDI's understanding of who is cost responsible for those upstream investments?
- J) Please confirm, at reference 8, whom the term "utilities" is intended to refer to when describing who should bear responsibility for the cost of "this infrastructure"? Specifically, does WDI contend that the cost of "this infrastructure" should be the cost responsibility of the utility, i.e., reducing WDI's net income, or conversely the cost responsibility of the existing rate payers of the utility, i.e., all other WDI ratepayers?
- K) Have the developers, or any affiliate of the developers, completed any other underground infrastructure projects in the WDI service territory? If so, have the developers been cost responsible for civil works for those connections? If not cost responsible for civil works, provide reasoning for not having developers be cost responsible?
- L) Please confirm that the letter at reference 6 is the only evidence relied on by WDI to support reference 1 and 4, for WDI to serve the subject lands. If not confirmed, what other evidence is being relied upon to evidence the developers' "clear preference".

RESPONSE

- A) The January 30, 2024, letter from the sterling group of companies remains the only formal letter on record; however, the developer has since reaffirmed its support for WDI serving the subject lands. See OEB staff-2 for additional details.
- B) See HONI-1 part e), specifically the email from sterling to WDI dated July 8, 2025, at 12:15 pm [re_ electrical servicing update – 400 45th Street South, Wasaga Beach 0708].
- C) WDI first became aware of the potential development through municipal circulation of pre-consultation application (PRE-C1722) on August 23, 2022. These early notices often do not materialize, but WDI acted prudently by sending an email to sterling at that time, noting HONI as the distributor of record and requesting their support should a SAA be pursued. No further communication occurred until January 30, 2024, when Primont homes contacted WDI to request that WDI's service area be amended to include this development. A second pre-consultation application (PRE-C00524) was issued on April 5, 2024, after WDI had engaged HONI to seek consent for the SAA.

- D) No meetings occurred prior to January 30, 2024; all communication was via email as referenced above. See HONI-1 part e for additional details.
- E) Relevant email correspondence is provided in Appendix F including communications with Primont, Sterling, and their consultants.
- F) No cost documentation was provided prior to receiving the letter in reference 6.
- G) WDI did not confirm civil works cost responsibility at any stage.
- H) To clarify, the statement in reference 7 was intended as a general note regarding any neighboring distributor and not specifically related to host/embedded relationships. Being an embedded distributor has no bearing on determining cost responsibility with developers in this instance.
- I) The statement was intended to provide an opinion that emphasizes long-term sustainability and fairness, not to redefine cost allocation principles that supports the efficient build out of newer homes.

The Town of Wasaga Beach has been among the fastest-growing municipalities in Ontario over the past 20 years. WDI has experienced similar growth. Residential ratepayers have benefited from some of the lowest service charges in the province due to developer contributions, which, while advantageous, also poses financial and operational risk in today's environment. WDI is therefore prioritizing long-term financial planning to mitigate these risks.

WDI is a financially strong utility. Its deemed debt-to-equity ratio is in the lower quadrant among Ontario LDCs (see Appendix G). In 2025, WDI temporarily paused its dividend to its shareholder as part of broader strategies to ensure long-term sustainability in alignment with its growth strategies and to ensure it is best prepared to support the broader Ontario wide priorities.

To be clear, with respect to reference 8, the intent of this statement, specific to this proceeding, is to convey WDI's position that the developer(s) of 400 45th Street should be kept whole. WDI acknowledges that, beyond cost considerations, there are a variety of valid reasons why the developer may prefer WDI to service these lands. In this context, partnerships, mutual success, and the broader benefits to the Ontario electrical distribution system are strong considerations in WDI's approach. The principle of partnership is a core element of WDI's corporate values.

- J) See HONI-1 part i)
- K) Yes. Developers and their affiliates have completed other underground projects in WDI's service territory. In those cases, WDI included civil works (e.g., trenching, duct banks, vaults) as part of its discounted cash flow (DCF) analysis.
- L) WDI does not confirm.

HONI-2:

References:

1. “The timing of this application is critical. The subdivision is progressing through municipal planning approvals, including detailed servicing design and composite utility plan preparation, where the serving utility must be identified to resolve alignment and space conflicts. A decision now will avoid costly redesigns, ensure civil works are coordinated with permanent electrical servicing, and prevent conflicts between utilities during construction.” – p. 4 of 27 of the WDI SAA application
2. “early certainty as to which utility will serve the subject lands is essential to avoiding delays, minimizing redesigns, and ensuring infrastructure investments are efficient and aligned. Addressing the service territory designation now will support coordinated development, protect WDI’s existing rights-of-way, and avoid unnecessary duplication of infrastructure” - p. 12 of 27 of the WDI SAA application
3. “...the project has not yet reached the offer to connect (OTC) stage...” – p. 4 of 27 of the WDI SAA application
4. “since the detailed design of electrical distribution connections depends on these finalized plans, it is not possible at this time to accurately allocate connection costs. A fully allocated connection cost model requires confirmed development details to determine the extent of required electrical infrastructure, such as transformers, feeders, and underground cabling. Until these details are finalized, any cost estimates would be preliminary and subject to change.” – p. 14 of 27 of the WDI SAA application
5. “for the same reasons outlined in section 3.2, capital contributions cannot be determined at this time. Without finalized development plans, it is not possible to accurately assess the electrical infrastructure requirements or associated capital costs.” – p. 14 of 27 of the WDI SAA application
6. Sterling group of companies letter dated jan 30, 2024 – schedule c, of the WDI SAA application

Interrogatory:

- A) Please provide a copy of the WDI designs for the subject lands and all available utility service layouts for the development.
- B) Please confirm that WDI has not provided the developers an offer to connect in accordance with the OEB’s ‘additional informational requirements for contested applications’ of the filing requirements for service area amendment applications, dated march 12, 2007, section 7.5.2.

- C) Please specifically detail what information is unavailable to WDI to provide a preliminary offer to connect to the developers.
- D) Based on the information as it is known today by WDI, please provide an example of the offer to connect WDI would provide the developers, and what efforts WDI has made to obtain this information?
- E) With respect to reference 1, please provide any information WDI has received with respect to the forecast timing of municipal and planning approvals for the subdivision.
- F) Please reconcile the apparent conflict between the following statements: (i) the necessity of an SAA determination at this stage of municipal planning approvals, including detailed servicing design and composite utility plan preparation, during which the serving utility must be identified to resolve alignment and space conflicts (references 1 & 2); (ii) the fact that, according to references 4 & 5, there is currently insufficient detailed design to define the required electrical infrastructure for accurately allocating connection costs or determining capital contributions; and, (iii) the timing of this application is now characterized as critical against the fact that WDI waited 1.5 years from the signed developer letter to file its proposed SAA (reference 1 & 6).
- G) Please isolate the a) design costs and b) inspection costs accounted for within WDI's estimates in its offer to connect related to the subject area of the proposed SAA? Please confirm whether these costs are being allocated directly to the developers.
- H) Are there any costs in addition to the costs that will be presented in the offer to connect that the developer would, or has the potential to receive, from WDI if WDI served the subject area?

RESPONSE

- A) WDI relied on a draft design provided by the developer's consultant for preliminary cost comparison purposes. This draft was also shared with HONI. A preliminary conceptual design was prepared solely for cost comparison purposes and is not suitable for an OTC or construction.
- B) Confirmed. WDI has not provided an OTC to the developer.
- C) See OEB staff-11 part 2.
- D) WDI cannot provide a formal OTC at this time and has not made efforts to obtain detailed design information because it is not yet available. The development is still progressing through municipal approvals, and the subdivision plan and lot fabric are not finalized. These details are essential to completing an electrical design, which forms the basis for an accurate cost estimate and discounted cash flow analysis, both of which are prerequisites for issuing an OTC. Until

these approvals are granted, any OTC would be premature.

- E) WDI has not received confirmed timing for municipal approvals. The development is in the draft plan stage, and the cup is pending. WDI seeks distributor certainty now to coordinate civil works and electrical servicing during the approval process and avoid delays for the developer.
- F) There is no conflict when viewed in the following context:
 - I. Urgency: the serving utility must be identified during cup preparation to avoid redesigns and conflicts.
 - II. Insufficient detail: while final lot fabric is pending, distributor certainty enables coordinated planning.
 - III. Delay: WDI waited 1.5 years after the developer's letter because it attempted to work collaboratively as a genuine partner with HONI. HONI seemed to stall and presented a questionable OTC to the developer, forcing WDI to file a contested application to protect local public interest and developer timelines.
- G) No OTC was provided. However, refer to HONI-5 a) for the cost comparison exercise.
- H) No. Based on the approach WDI has undertaken to develop its cost estimate, WDI does not anticipate any costs beyond those presented in the OTC, except in the event of a change in scope or unforeseen circumstances, such as regulatory requirements, material price fluctuations, or site-specific conditions that materially impact the design. Any such changes would be communicated to the developer promptly.

HONI-3:

References:

1. "Generally, the applicant should be able to demonstrate that it can provide the lowest cost connection, and that the proposed connection is consistent with existing networks, avoiding duplication" - board's decision with reasons, rp-2003-0044, par. 85
2. "HONI has no proximate infrastructure to the subject lands and would need to upgrade approximately 4.95 km of existing line and construct an additional 350 m of new line to make the connection. This approach would duplicate facilities already in place, introduce unnecessary cost, and create avoidable community disruption" – p. 4 of 27 of WDI SAA application
3. "In the WDI SAA, hydro one's proposed connection has been misrepresented and therefore, hydro one is correcting the record of this proceeding to reflect the specifics of hydro one's actual proposed connection of the developers at the subject area. Hydro one's proposed connection consists of only upgrading approximately 250 meters of existing line and 350 meters of

expansion. This is confirmed in hydro one's multi-service connection cost agreement, included in attachment 5, which contains two service connection options for consideration by the developers." – p. 6 of 18 of HONI intervenor evidence

4. "The WDI proposed SAA does not optimize the use of existing system configurations and unnecessarily duplicates existing distribution assets. Hydro One has upstream capacity available to facilitate the new development. In addition, hydro one has the capability to switch load to a different circuit, in the event of an issue with the 8kv system. Hydro one confirms capacity is available to accommodate the load of the subject area from Sunnidale corners ds f2 that also has an existing tie point with capacity available from Duntroon ds f2 to accommodate the development." – p. 15 of 18 of HONI intervenor evidence.

Interrogatory:

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

RESPONSE

- a) Regardless of not requiring the 4.95 km upgrade, HONI's proposed expansion along Morgan Road and into the Subject Lands does not utilize WDI's network, which provides for redundancy, and supports future customer needs such as EV adoption, building electrification, and DERs.
- b) Yes, WDI maintains its position. WDI can serve the Subject Lands with minimal upgrades. Any HONI facilities added to serve the Subject Lands will duplicate the service that can be provided by WDI's Morgan Road upgrades, which is contrary to the OEB's principles of avoiding unnecessary duplication.

HONI-4:

Reference:

1. "This system, designed and built to accommodate future load growth in the area, has sufficient capacity to serve the projected 2.1 MW load without upstream investment, ensuring that the

connection can be made with minimal incremental cost and maximum use of existing assets” – p. 4 of 27 of WDI SAA Application

2. “Any concerns that HONI may have regarding the proposed 2.1 MW has the potential to pale in comparison to the potential impacts of additional 65 MW of load”. – p. 8 of 11 of WDI Supplementary Evidence
3. “The Subject Lands are directly adjacent to recently upgraded WDI infrastructure along Morgan Road, extending from Club Court to Middleton Drive (see Figure 2), part of a purpose- built section of WDI’s network designed to accommodate growth within the Town of Wasaga Beach. This infrastructure was specifically planned and constructed to support residential development and provide redundancy in this area and is currently serving surrounding subdivisions.” p. 13 of 27 of WDI SAA Application Evidence.
4. “HONI has provided evidence to question WDI’s use of the words “purpose built” and seems to suggest that WDI has done so, specifically for this development. Again, WDI always understood 400 45th Street to fall within its licensed service territory. That interpretation was ultimately correct or not, WDI’s actions were based on its genuine and reasonable understanding of its service area and licence obligations. WDI would therefore strongly object to any suggestion or interpretation that it has purpose-built assets in this area specifically for this development, or any other misrepresentation HONI might try and convey.” – p. 3 of 11 of WDI Supplementary Evidence.

Interrogatory

- a) At Reference 1 and 2, please provide all studies, reports, data, and calculations with dates and assumptions (e.g. load profiles) that WDI relied on to conclude that its existing infrastructure can accommodate the projected 2.1 MW load without any upstream investments
- b) At Reference 1, define the term “this system” as used in the Reference, and identify each component involved (e.g. substation, transformer, feeder lines).
 - i. For each component, provide its design capacity (e.g. MW), current peak load or utilization, and available spare capacity.
 - ii. If any of these components identified in (i.) were upgraded or reinforced (collectively, Upgrades) since 2020 to support future growth, provide the details and dates of those Upgrades.
 - iii. Please provide all alternatives considered for any of the Upgrades.
- c) At Reference 1, please confirm the majority of the load growth in this area targeted by “this

system” would materialize within Hydro One service territory.

- d) At Reference 2, provide examples of past connections of similar size to 2MW in WDI’s service area, including the capacity of the host feeder at the time, any system upgrades required, and the final costs of those projects. Please also detail the cost borne by developers or customers for each project.
- e) At Reference 4, WDI provides supplementary evidence that suggests that Hydro One has misinterpreted WDI’s prefiled evidence with respect to how facilities have been purpose built to accommodate future growth as detailed at Reference 1 and 3. Please clarify how Hydro One has misrepresented the prefiled evidence provided by WDI on the upstream facilities being purpose built to address future load growth. In so doing, please clarify what is meant by WDI by the following statements in each respective reference:
 - i. Reference 1: “This system, designed and built to accommodate future load growth in the area...”
 - ii. Reference 3: “The Subject Lands are directly adjacent to recently upgraded WDI infrastructure along Morgan Road, extending from Club Court to Middleton Drive (see Figure 2), part of a purpose-built section of WDI’s network designed to accommodate growth within the Town of Wasaga Beach. This infrastructure was specifically planned and constructed to support residential development and provide redundancy in this area and is currently serving surrounding subdivisions.”

RESPONSE

- a) WDI relied on station loading data and feeder load data from its Distribution System Plan (EB-2023-0055, Exhibit 2) and Load Growth Analysis Report (EB-2023-0055, Exhibit 2, Appendix D). These reports include historical peak demand, forecast growth assumptions, and capacity analysis confirming that existing infrastructure can accommodate the projected 2.1 MW without upstream investment.
- b) The term “this system” refers to WDI’s broader distribution network in the area, including MS6, MS3, the feeder ties between MS6 and MS3, and other system elements. It is not limited to recent upgrades; it also includes legacy assets, some dating back 50+ years. These components were planned and implemented as part of system planning to enhance reliability, provide redundancy, and accommodate long-term growth - not for a single development.
- c) No. “This system” includes legacy assets - some dating back to Ontario Hydro ownership. Over the years, this system has been expanded as the municipality evolved from a seasonal cottage

community to a year-round town. All investments were planned to support community growth, redundancy, and system readiness, not to target HONI territory.

- d) WDI can provide examples of past large-scale connections within its own service area, such as Georgian Sands, River's Edge and Sunnidale Trails, all of which were multi-phase residential developments. These projects were served entirely within WDI's network using existing host feeder capacity; no upstream HONI investments were required.

WDI does not have access to HONI's historical capacity data. This limitation underscores why WDI has been actively seeking deeper engagement with HONI (see Appendix H) - to improve coordination, share planning assumptions, and ensure transparency for future developments.

- e) The intent of the statements in References 1 and 3 is to clarify that the phrase "purpose built" refers to long-term system needs. The system was designed to provide redundancy and enhance reliability, not for a single development. While it accommodates future load growth, that growth relates to broader system planning, not one project.

HONI-5:

References:

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

Interrogatory:

- a) Please provide WDI's costs in the table format provided in Reference 3, Table 1 'One-Time Connection Costs'.

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

RESPONSE

- a) WDI has not progressed to evaluating Option A versus Option B. At this stage, only a single preliminary estimate was prepared for cost comparison purposes, based on the draft design provided by the developer's consultant. WDI notes that its cost structure includes different contestable and non-contestable components compared to HONI, which results in significant variances between the two estimates. These differences reflect each utility's design standards, work practices, and allocation methodologies.

Connection Cost Component	Hydro One		WDI aligned with HONI's Option A costing practice
	Option A	Option B	
Non-contestable work (poles, wires, meters)	1,226,835.53	1,226,835.53	1,952,850.42
Design costs	16,718.54	16,718.54	15,240.96
Contestable work	1,021,279.91	-	199,681.70
Civil Work	-	-	
Capital Contributions	-	-	1,132,221.00
Total (excludes HST)	2,264,833.98	1,243,554.07	2,167,773.07
Inspection	-	92,566.02	13,872.59

- b) WDI understands that, in Reference 2, the term “premium solution” as used in the OEB Bulletin may be interpreted to refer to higher-cost alternatives, such as an underground supply solution, in contrast to a standard overhead line solution. WDI notes that how such costs would be calculated could be subject to interpretation.
- c) n/a.
- d) Trenching may be shared with other utilities (e.g., telecom, gas, water) when coordinated. Duct banks, vaults, and road crossing components are generally not shared.
- e) WDI will act in accordance with OEB guidance and direction in the allocation and recovery of the costs of this connection, including “undergrounding” costs.

HONI-6:

References:

1. 2023 Reliability Metrics Comparison – p. 15 of 27 of the WDI SAA Application
2. “Unlike WDI’s looped and recently upgraded system, HONI’s design introduces a single point of failure, reduces overall reliability, and entails a higher-cost, less efficient build that duplicates existing infrastructure without adding value.” – p. 16 of 27 of the WDI SAA Application
3. “WDI consistently outperforms HONI in reliability metrics (SAIFI and SAIDI), offering fewer
4. and shorter outages and a more resilient system with built-in redundancy” – p. 9 of 27 of WDI SAA Application
5. “Importantly, WDI operates well below the OEB’s established reliability targets, demonstrating a highly reliable system, whereas HONI exceeds its targets, indicating comparatively lower reliability. These performance benchmarks underscore that WDI’s network is inherently more reliable.” – p. 15 of 27 of WDI SAA Application

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

Interrogatory:

- a) Please explain the SAIDI and SAIFI results year over year from 2018 to 2023 with explanations for the annual variances in performance, following the LTLT SAA Decision.
- b) Given References 2 through 4, please detail the rationale for upgrading the infrastructure along Morgan Road to create a loop feed for existing connections for further redundancy purposes.
- c) With respect to Reference 2, please provide the SAIDI and SAIFI data for the affected feeders in the area for the five years prior to the in-servicing of WDI’s looped and recently upgraded system. Please provide the same reliability data post-in-servicing this upgraded infrastructure.
- d) Please provide the number of unplanned outages in this area in the five years prior to the recently upgraded infrastructure detailed at Reference 2. Please detail the cause and duration of each unplanned outage.
- e) Please confirm if the loop redundancy for the new subdivision connection is included in the cost estimate or is there additional cost required to complete the loop?
- f) Please detail the depth of consultation undertaken by WDI with Hydro One in advance of filing the WDI Distribution System Plan (EB-2023-0055) as an embedded distributor of Hydro One and neighboring distributor, as noted at Reference 5.

RESPONSE

- a) WDI’s SAIDI and SAIFI results from 2018 to 2023 consistently remained well below OEB reliability targets, reflecting strong system performance.

Summary:

- 2019: Stable year, mostly scheduled outages and loss of supply.
 - 2020–2021: Spike due to major scheduled outages and severe weather, increasing SAIFI and slightly SAIDI.
 - 2022: Improvement as scheduled outages declined and restoration times improved.
 - 2023: Best performance with fewer weather events, lowering outage frequency and duration.
 - Key Drivers: Capital projects and storms caused peaks; completion of upgrades and fewer severe events drove improvements.
- b) The Morgan Road upgrade was necessary to connect the new MS6 station to the rest of WDI’s network at multiple points. This is one of the ties that create redundancy and improve operability

by enabling load transfer, switching flexibility, and contingency support. It ensures the system can maintain reliability during outages, accommodate load growth, and operate efficiently without relying on single radial feeds.

- c) The Morgan Road upgrade was completed in December 2024; therefore, only year-to-date 2025 reliability data reflects post-in-service performance.

Year	SAIDI	SAIFI
2019	0.778	0.632
2020	4.316	2.443
2021	0.001	0.001
2022	0.000	0.002
2023	1.398	0.687
2024	1.741	1.713
2025 YTD	4.469	0.626

- d) Outage data for the feeders affected by the Morgan Road Upgrade.

Outage Causes by Year	Count of events	Sum of Interrupted Minutes
2019	3	412
(5)Defective Equipment	1	51
(6)Adverse Weather	2	361
2020	8	1,010
(0)Unknown/Other	1	15
(5)Defective Equipment	4	326
(6)Adverse Weather	3	669
2021	1	88
(0)Unknown/Other	1	88
2022	1	3
(5)Defective Equipment	1	3
2023	5	666
(2)Loss of Supply	1	117
(5)Equipment Failure	3	473
(8)Human Element	1	76
2024	8	467
(2)Loss of Supply	2	105
(3)Tree Contacts	1	50
(6)Adverse Weather	1	82
(9)Foreign Interference	4	230

- e) Confirmed. The cost estimate for the new subdivision connection will include loop redundancy within the subdivision. WDI's design inherently incorporates an internal looped system to enhance reliability and operational flexibility; no additional cost is required to complete the loop.
- f) WDI's consultation with HONI before filing its DSP was limited to routine operational discussions and review of HONI's published regional plans; no formal joint planning occurred. WDI's approach reflects its focus on maintaining strong reliability within its embedded network by investing in system redundancy and feeder ties, ensuring SAIDI and SAIFI remain well below OEB targets. While this approach has delivered strong performance, WDI remains committed to deeper collaboration with HONI in future planning cycles to enhance coordination and system efficiency.

HONI-7:

Reference:

1. "The Subject Lands are directly adjacent to recently upgraded WDI infrastructure along Morgan Road, extending from Club Court to Middleton Drive (see Figure 2), part of a purpose- built section of WDI's network designed to accommodate growth within the Town of Wasaga Beach. This infrastructure was specifically planned and constructed to support residential development and provide redundancy in this area and is currently serving surrounding subdivisions." – p. 13 of 27 of WDI SAA Application
2. "The WDI annual capital plans have been included as Attachments 2, 3 and 4 of this intervenor evidence, respectively. Therein, WDI articulates plans to undertake the following:
 - 1) MS#6 Sunnidale Road Substation – 2022 Capital Budget Report, Attachment 3, p. 32.
 - 2) Morgan Road (new stn backup) Overhead – 2022 Capital Budget Report, Attachment 3, p. 33.
 - 3) Morgan Road –2023 Capital Budget Report, Attachment 4, p. 29.Cumulatively, these investments equate to a minimum of a new substation and the expansion of over 3km of primary conductor at a forecast capital cost exceeding \$4 million." – p. 11 of 18 of HONI Intervenor Evidence
3. [EB-2023-0055 - Appendix K of 2-VECC- 3 – WDI approved budget plans for the 2021 through 2023 capital expenditures – Filed February 2, 2024](#) – HONI Intervenor Evidence Attachments 2, 3, 4
4. "WDI has approximately 470 meters of existing pole line along Morgan Road; however, this

infrastructure was not originally built to serve the subject development and will require upgrading to accommodate permanent service. Granting the amendment will enable WDI to utilize and upgrade this existing infrastructure efficiently.” – p. 18 of 27 of WDI SAA Application

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

Interrogatory:

- a) Please confirm that the recently upgraded WDI infrastructure along Morgan Road, extending from Club Court to Middleton Drive detailed at Reference 1, 2, 3, are those planned in the 2023 Capital Budget, detailed at Slide 29, with a forecast capital cost of \$547,631.
 - i. If so, please fully describe what was intended by WDI with respect to “greater load capabilities” in the sentence in Reference 9, and
 - ii. Please identify from WDI’s DSP the need for the upgrade undertaken to the infrastructure along Morgan Road
- b) Please clarify whether WDI ratepayers or the Developer will be the beneficiaries that pay for the work detailed at Reference 4.
- c) With respect to References 3, 5, 6, and 7, please confirm that it is WDI’s position that any costs

associated with the previously incurred upstream investments that have been placed in service in the last three years to address anticipated forecast growth in the area should not be included in the comparison of costs between utilities? If so, please provide WDI's rationale for this position.

- d) At Reference 7, please detail why WDI believes the Morgan Road upgrade is a "strategic section".
- e) At Reference 7, WDI highlights that approving the SAA would avoid unnecessary duplication of ratepayer funded investments that have been recently completed. Please provide both the total cost of the following investments as well as the proportionate share of those costs that existing WDI ratepayers have funded for the below:
- i. WDI's Municipal Station 6
 - ii. The work identified as Morgan Road in the 2023 Capital Plan including replacing the three-phase riser pole on Sunnidale Rd. S., installing ducts and conductors through the golf course to Club Court where the existing sectionalizing cabinet will be replaced with a new pad mounted switchgear unit as well as new conductors installed in existing ducts between the new switchgear unit and the existing pole line at Wedgewood Drive to complete the circuit.
 - iii. The work identified as Morgan Road (new stn backup) – Overhead in the 2022 Capital Plan that included a 3 phase 8 kV pole line along Morgan Road between Middleton Boulevard and Club Court.
- f) If any of the assets in-service identified in Reference 2 were not purely funded by existing WDI ratepayers and contributions in aid of construction (CIAC) were made, please provide the amounts and timing of the capital contributions provided.

RESPONSE

- a) Yes, we confirm. See OEB Staff-5 for costs.
- i. Greater load capabilities refers to the ability of the feeder tie between MS3 and MS6 to support higher demand, improve load transfer flexibility, and accommodate future growth. This corridor can handle incremental 2.1 MW subdivision load plus long-term growth identified in WDI's Load Growth Analysis.
 - ii. DSP Need: The upgrade was justified in WDI's DSP (EB-2023-0055, Exhibit 2, page 108 off 117) to enhance redundancy, operational flexibility, and system resilience, supporting feeder ties between MS3 and MS6 for outage management and reliability.
 - iii. This upgrade was identified as an investment in System Service.
- b) This is included in the cost estimate and would be included in the DCF evaluation.

- c) Yes, WDI's position is that previous upstream investments (e.g., MS6, Morgan Road tie) should not be included in the cost comparison because they were planned and implemented for long-term system needs, not for a single development. Including them would distort the principle of incremental cost comparison under RP-2003-0044, which focuses on the lowest incremental cost connection rather than sunk costs.
- d) The section is strategic because it completes the feeder tie between MS3 and MS6, enabling looped supply, load transfer during contingencies, and future growth capacity. Without this tie, the feeders would remain partially radial, limiting reliability and operational flexibility.
- e) For clarification, the reference to "avoiding unnecessary duplication of ratepayer-funded infrastructure" relates to the risk of HONI bypassing WDI's existing feeder tie designed for redundancy, reliability, and load transfer flexibility, not the short pole line segment upgrade/expansion.
 - i. See response to OEB Staff-5
 - ii. See response to OEB Staff-5
 - iii. See response to OEB Staff-5
- f) Does not pertain to this proceeding – See response to OEB Staff-5

HONI-8:

Preamble:

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

In WDI's supplementary evidence, WDI states:

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

Reference:

1. "The WDI annual capital plans have been included as Attachments 2, 3 and 4 of this intervenor evidence, respectively. Therein, WDI articulates plans to undertake the following:
 - 1) MS#6 Sunnidale Road Substation – 2022 Capital Budget Report, Attachment 3, p. 32.

2) Morgan Road (new stn backup) Overhead – 2022 Capital Budget Report, Attachment 3, p. 33.

3) Morgan Road –2023 Capital Budget Report, Attachment 4, p. 29.

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

2. [EB-2023-0055 - Appendix K of 2-VECC- 3 – WDI approved budget plans for the 2021 through 2023 capital expenditures – Filed February 2, 2024](#) – HONI Intervenor Evidence Attachments 2, 3, 4
3. EB-2006-0327, Filing Requirements for SAA Applications, March 12, 2007.
4. “Ultimately, this project will have the benefits of redundancy, increased load distribution capabilities, and greater load capabilities” – 2023 Capital Budget Report, Attachment 4, p. 29.
5. “In EB-2023-0055 (WDI Cost of Service), WDI submitted independent evidence of anticipated load growth within its service area of potentially seeing up to 103.6 MW by 2033. Any concerns that HONI may have regarding the proposed 2.1 MW has the potential to pale in comparison to the potential impacts of additional 65 MW of load.” – p. 8 of 11 of WDI Supplementary Evidence
6. EB-2023-0055, WDI Cost of Service Application, October 20, 2023, Exhibit 2 Rate Base and Capital, Appendix 2 (C) 2024-2028 Wasaga Distribution Inc. Distribution System Plan, Appendix D: Load Growth Analysis Report – p. 2 of 11 of WDI Supplementary Evidence
7. EB-2023-0055, WDI Interrogatory Responses, dated February 2, 2024, 2-Staff-25, Load Growth Analysis Report.

Interrogatory:

- a) Please provide a table of WDI’s annual customer count by rate class for the last 5 years.
- b) At Reference 1, 2 and 4, please detail how many incremental customers relative to 2020 have been connected annually for: 1) Morgan Road – 2023 and 2) Morgan Road – new stn backup and capture the information by adding two additional columns to the table created in response to question a), above.
 - 1) Morgan Road: The work identified as Morgan Road in the 2023 Capital Plan included replacing the three-phase riser pole on Sunnidale Rd. S., installing ducts and conductors through the golf course to Club Court where the existing sectionalizing cabinet will be replaced with a new pad mounted switchgear unit. New conductors will be installed in existing ducts between the new switchgear unit and the existing pole line at Wedgewood

Drive to complete the circuit.

- 2) Morgan Road (new stn backup) Overhead: The work identified as Morgan Road (new stn backup) Overhead in the 2022 Capital Plan that included a 3 phase 8 kV pole line along Morgan Road between Middleton Boulevard and Club Court.
- c) Pursuant to s.7.1.6 of Reference 3, please provide a description of WDI's plans, known to date, for similar expansions in lands adjacent to the Subject Area. Provide a map or diagram showing the lands where expansions are planned in relation to the Subject Area with the timing contemplated for these expansions.
- d) At Reference 1, please detail for each investment 1) MS#6 Sunnidale Road Substation; 2) Morgan Road (new stn backup) Overhead; and 3) Morgan Road, if they are defined as planned growth or potential load growth within the Load Growth Analysis Report based on WDI's definition outlined in Reference 7, 2-Staff-25, a).
- e) Provide the corresponding references for the investments identified in Reference 1 to WDI's Load Growth Analysis Report at Reference 6.
- f) Please provide the source for the 65 MW of load cited in Reference 5 and the location of this load for future development.
- g) Reference 7 details that planned growth in Reference 6 is derived from projects in the Town that are either in the final stages of planning approvals or currently under construction. Assumptions for the potential growth rely on preliminary submissions from the Town Pre- Consultation process and strategic growth areas outlined by the municipality's planning. These two sources of growth loads have been utilized to forecast the capacity needs of WDI. Given this detail, please confirm whether:
 - i. Reference 6 contemplated the development of the Subject Area.
 - ii. Any of the other preliminary submissions from the Town pre-consultation process and strategic growth areas outlined by the municipality's planning are currently in HONI's service territory.

RESPONSE

- a) Please find below the table of WDI's annual customer count by rate class from 2020-2024:

	2020	2021	2022	2023	2024
Residential	13,372	13,622	13,978	14,524	14,796
GS<50 KW	833	832	849	860	840
GS>50 KW	33	34	36	38	39
Streetlights (Customer)	1	1	1	1	1
USL	35	37	45	55	42

- b) No incremental customers can be attributed to the Morgan Road projects. These were system service investments implemented to improve redundancy, reliability, and operational flexibility - not to connect specific subdivisions. Accordingly, the table in part (a) remains unchanged.
- c) No expansions are currently planned in the vicinity of the Subject Lands, whether within WDI's or HONI's service territories.
- d) Please see response to 2-Staff-25 – as defined, planned growth is derived from projects in the Town of Wasaga Beach that are either in the final stages of planning approvals or currently under construction. Potential growth relies on preliminary submissions from the Town's pre-consultation process and strategic growth areas outlined by municipal planning. These two sources were used to forecast some of WDI's capacity needs. MS6 and Morgan Road were not only implemented for subdivision development growth but to address broader load growth and system reliability requirements, including anticipated future growth.
- e) The Load Growth Analysis Report was dated October 2023, by which time MS6 was already built and in service, as shown in the substation load table (page 8). The Morgan Road feeder tie was also planned and in the process of being completed. These projects were therefore not future assumptions but existing or committed investments. Accordingly, there is no corresponding investment reference in the report.
- f) The 65 MW figure is derived from WDI's Load Growth Analysis Report, which aggregates potential growth from municipal strategic areas and pre-consultation submissions, and anticipated electrification adoption.
- g) The following is confirmed:
 - i. While the Subject Area was included in the Load Growth Analysis Report, WDI only became aware of this during this interrogatory process, as the development growth source data was provided by the Town of Wasaga Beach. The inclusion was not intended to forecast subdivision-specific load but to analyze the overall impact of load growth on WDI's distribution system.

- ii. After verification, no other preliminary submissions or strategic growth areas identified by the Town fell outside WDI's service territory.

HONI-9:

References:

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

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

Interrogatory:

- a) At Reference 1, state whether WDI describes the Morgan Road infrastructure, extending from Club Court to Middleton Drive, as ‘purpose-built’. If yes, please provide WDI’s definition of “purpose-built” as used in this context.
- b) At Reference 1 and 2, define the beneficiary by geographical location for the ‘recent upgraded WDI infrastructure’.
- c) Provide the evidence that underpinned WDI’s investment decision for this ‘purpose-built section of WDI’s network’ identified in Reference 1.
- d) Identify how the investment need was assessed and what WDI considered in its determination to have its ratepayers fund the ‘purpose-built’ section of WDI’s network, designed to accommodate growth’ pertaining to Hydro One’s service territory.
- e) Please identify any investments, not yet identified by Reference 3, that are ‘purpose-built by WDI to expand WDI distribution system to supply the Subject Area’ and/or future developments that are currently within HONI’s service territory. For each investment, please provide the reference in WDI’s Capital Budget Reports (EB-2023-0055) with the capital costs and detail whether those costs are forecast or actual.
- f) Please provide how WDI’s actions in Reference 1 and 2 aligns with the beneficiary-pays principle.
- g) How does WDI recommend that the OEB and parties to this proceeding assess the cost burden imposed on the developers and existing WDI ratepayers, respectively, absent an offer to connect? Please clarify why WDI believes that section 7.5 of the OEB’s minimum filing requirements for

contested service area amendments does not apply in this proceeding, including the mandatory requirement for information and documentation to be filed flowing from the Offer to Connect (OTC)?

- h) In response to the question above, if WDI relies on its position in Reference 7, please explain how this connection is materially different than any other connection across the province that has preceded it and have complied with the OEB's service area amendment mandatory filing requirements?
- i) Please provide a table of the variance between WDI versus Hydro One's Customer Satisfaction Survey Scorecard results annually from 2019 to 2024.

RESPONSE

- a) WDI describes the Morgan Road infrastructure as purpose-built. WDI used the phrase "purpose-built" to mean planned and constructed to enhance system reliability, provide redundancy, and accommodate long-term load growth, not for a single development. This includes anticipated electrification trends.
- b) The upgraded infrastructure benefits customers within the municipal boundaries of the Town of Wasaga Beach, including both existing and future customers. These investments were planned as part of WDI's Distribution System Plan to enhance reliability, provide redundancy, and support anticipated long-term load growth.
- c) The Capital Budget Reports referenced in HONI's evidence outline WDI's definition of "System Service" and the rationale for these investments. These projects were identified through WDI's asset management and system planning process to enhance reliability, redundancy, and operational flexibility. For additional context, please also refer to WDI's response to OEB Staff-5.
- d) The investment need was assessed through WDI's asset management and system planning process, which identified requirements for redundancy, reliability, and load transfer capability to support long-term system resilience. These projects were not designed to accommodate growth in HONI's service territory. They were implemented to address WDI's own system needs, and to ensure operational flexibility within WDI's licensed area. Ratepayer funding was justified because these upgrades benefit WDI's entire network and customer base, not a single development.
- e) WDI does not have any planned investments that are 'purpose-built' by WDI to expand WDI's distribution system to supply the Subject Area' and/or future developments that are currently within HONI's service territory. All recent investments, including MS6 and the Morgan Road

upgrades, were implemented to address WDI’s own system needs, such as redundancy, reliability, and anticipated electrification trends, within WDI’s licensed service area. These projects were not designed to consider growth in HONI’s territory.

- f) See HONI-9 d)
- g) WDI believes that the OEB will have sufficient information in order to make a decision on the SAA Application, taking into account all the factor from the Combined Proceeding. As explained in evidence and interrogatory responses, WDI does not currently have sufficient information to prepare a complete OTC. However, clarity and certainty as to the developer who will serve the Subject Lands is important now, and that is why the SAA Application is proceeding.
- h) WDI does not wish to speculate on other proceedings or how they complied with the OEB’s filing requirements. Each service area amendment is unique and assessed based on its own facts and circumstances.
- j) Please find below a table of the variance between WDI versus HONI’s Customer Satisfaction Survey Scorecard results annually from 2019 to 2024:

Table 1: HONI/WDI Customer Satisfaction Scorecard Comparison

	2019	2020	2021	2022	2023	2024
WDI	81.8%		81.0%		81.0%	
HONI	84.2%	82.9%	82.4%	82.4%	82.1%	85.7%
Variance	2.4%		1.4%		1.1%	

WDI engages a third-party vendor to conduct its annual customer satisfaction survey through random phone interviews. WDI does not provide incentives for participation, nor does it allow customers to complete the survey online. This approach ensures unbiased and representative feedback from the customer base.

WDI acknowledges that customer satisfaction results can vary substantially among utilities due to differences in survey methodology, timing, customer demographics, and engagement strategies. Given the absence of a standardized process for conducting or calculating CSAT results across utilities, WDI considers direct comparisons with other distributors - such as HONI - under differing conditions to be of limited relevance.

The strong preference of the local community for WDI as its utility was demonstrated in 2017, when the Town of Wasaga Beach conducted a review of municipal utility ownership. More than 8,000 community members signed petitions expressing their desire for WDI to be retained and supported to grow, reflecting a clear and sustained customer preference for WDI as the local distributor.

https://www.simcoe.com/news/wasaga-utility-decision-irks-some/article_2f6e16a7-2a26-5565-80ad-9cff958a70fa.html.

WDI recently conducted their 2025 Customer Satisfaction (CSAT) survey and results indicated a score of 85%.

HONI-10:

References:

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

Interrogatory:

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

RESPONSE

- a) The 2024 OEB Scorecard does not provide the number of residential customers served by WDI. 660 new residential customers would increase WDI current customer base by ~4.5%.

HONI-11:

Reference:

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

Interrogatory:

- a) Identify all assets WDI considers “existing infrastructure along Morgan Road” and identify whose service territory they reside within.
- b) For each asset, provide: asset type, voltage, precise location (GPS or civic), function (distribution metering, switching), in-service date, original installed cost, accumulated depreciation, and current net book value (NBV).
- c) Confirm whether each asset is currently energized and serving load and identify the current

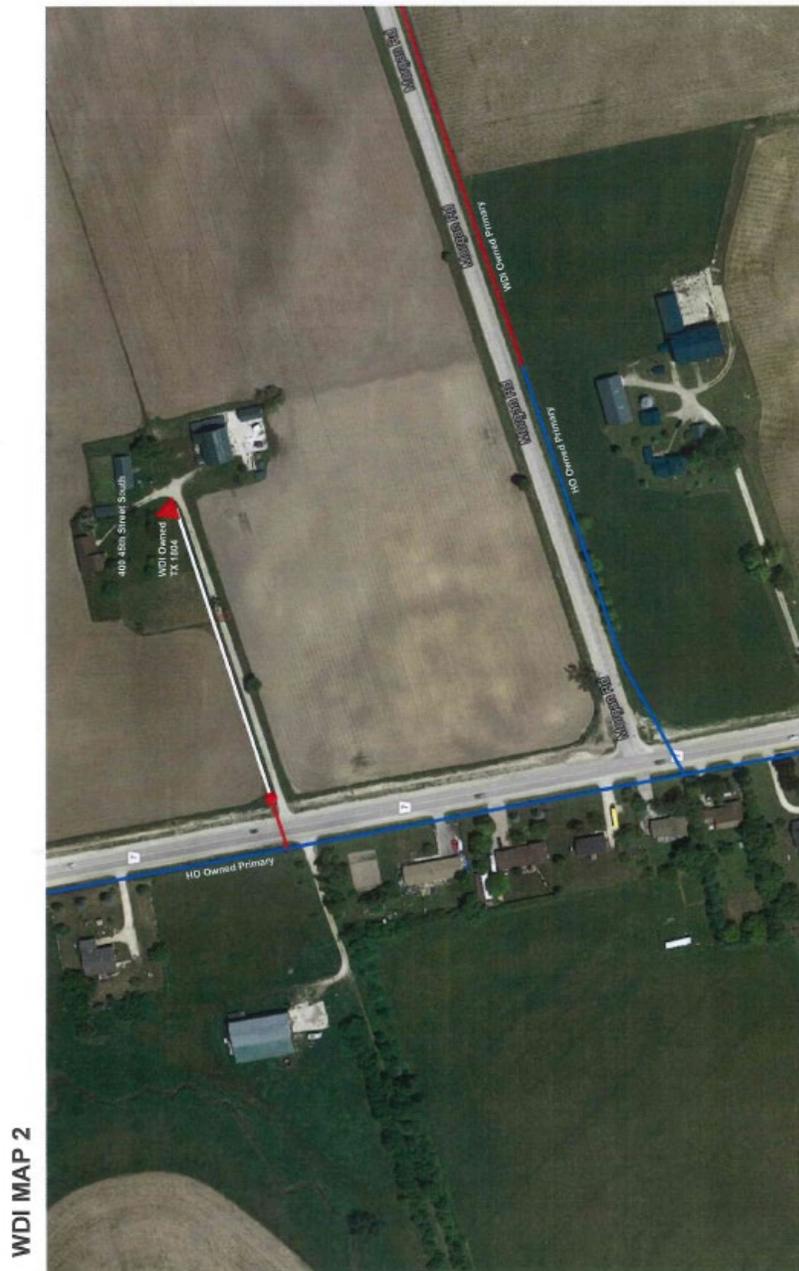
numbers of customers served by each asset.

- d) Describe all mitigation options available if the SAA is denied (e.g., reconfiguration, redeployment) and the expected utilization of each affected asset under those options. Identify any incremental costs or savings from mitigation versus declaring assets stranded.
- e) Please provide more information regarding WDI's "long-standing occupation rights" in this utility corridor. Specifically, please provide:
 - i. The type of legal rights granted to WDI or relied upon by WDI, for occupation of the utility corridor.
 - ii. Copies of all real estate rights identified in e), i) above, including any easement rights.
 - iii. A map with sufficient detail outlining the utility corridor and its boundaries.
 - iv. Details on how determination to deny the SAA, will undermine the specific rights described in section i), above.
 - v. The gross book value and net book value of the referenced real estate rights.

RESPONSE

- a) The existing infrastructure consists of a single-phase overhead pole line, approximately five poles with primary and neutral conductors, located along the south side of Morgan Road. As shown in the attached map (filed in EB-2016-0207).

Filed: 2016-06-28
Attachment 4
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[*HONI_Wasaga_app_SAA_20160629*](#)

These assets reside within HONI's licensed service territory; however, they are legacy infrastructure that predates HONI and WDI's existence. WDI notes that similar legacy configurations exist elsewhere, where HONI assets are situated within WDI's territory.

- b) The five poles, along with their associated hardware and conductors, are fully depreciated and

carry no book value.

- c) The pole line is energized but does not currently serve any customers. It remains in place as legacy infrastructure and was not addressed during the Long-Term Load Transfer (LTLT) proceeding, although it was identified at that time.
- d) If the SAA is denied, WDI's preferred mitigation option is removal of the assets. Removal would involve standard decommissioning and disposal procedures.
- e) The following information is provided for clarification regarding WDI's "long-standing occupation rights" in this utility corridor:
 - i. The alignment of the pole line reflects historical arrangements that predate current licensing boundaries, WDI relied on legacy agreements that existed prior to market deregulation.
 - ii. WDI does not hold separate registered easements for this corridor as it's within the municipal right-of-way.
 - iii. See HONI-11 c)
 - iv. WDI maintained the assets described in HONI-11 (b) following the OEB's direction during the LTLT elimination process, to ensure continuity and flexibility for future system planning. See OEB-12 and Appendix D.
 - v. n/a.

HONI-12:

References:

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

Interrogatory:

- a) Please reconcile WDI's statements between the Joint LTLT Application (Reference 1) and WDI's current position that denial of the proposed SAA would strand infrastructure along Morgan Road (Reference 2).
- b) Provide a chronology of all Morgan Road infrastructure additions, relocations, or upgrades from January 1, 2015 to present (asset name, approval date of investment need decision, asset in-service date, book value cost, and stated need) to provide the details for Reference 2.

- c) Identify which of these assets WDI now characterizes as: i) at risk of stranding, and ii) whether those asset investments were undertaken with knowledge that the Subject Area lands are within Hydro One's License (ED-2003-0043).

RESPONSE

- a) See HONI-11.
- b) This matter is addressed collectively in the responses to HONI-4, HONI-7, and HONI-9.
- c) The only assets at risk of stranding are five poles with single-phase primary and neutral conductors along Morgan Road. These were originally installed by Ontario Hydro prior to HONI and WDI existence.

HONI-13:

Reference:

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

Interrogatory:

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

RESPONSE

- a) The only relevant asset(s) is a single-phase overhead pole line along Morgan Road, consisting of approximately five poles with primary and neutral conductors. This infrastructure is located within the access corridor to the Subject Lands. Although originally installed as legacy plant, its proximity and alignment make it technically suitable for connection to a potential Phase 1 of the

proposed development, subject to actual load requirements.

- b) There are no WDI assets on Morgan Road that WDI considers “not referable and connected or connectable” to the Subject Area.
- c) The assets are fully depreciated. The stranded value is based on removal costs.

HONI-14:

References:

1. “Faster service connection timelines: Because WDI already has upgraded facilities and distribution assets in place near the Subject Lands, it can complete the connection using standard construction methods within a significantly shorter timeline than would be required for HONI to design, permit, and upgrade a 4.95 km pole line upgrade and construct 350 m pole line expansion. This supports timely project development and reduces delays related to utility servicing.” – p. 17 of 27 of WDI SAA Application
2. “The Town of Wasaga Beach, as the local municipality, also supports WDI as the logical and efficient service provider.” – p. 4 of 27 of WDI SAA Application
3. “One advantage is that WDI will allow us to complete the design, and HONI will complete it in-house, so with WDI, the design process and utility coordination aspect will be streamlined. ” – Primont Intervention Request, October 9, 2025
4. “The Town of Wasaga Beach - WDI’s shareholder - would be the only confirmed permanent connection to be serviced on these developed lands and the developer’s interests on the matter has been disregarded by HONI. Their approach cannot reasonably be said to be serving the public interest.” – p. 3 of 11 of WDI Supplementary Evidence
5. “HONI is a publicly traded entity; WDI Holds no ownership stake in HONI. WDI’s preference has always been to work collaboratively with HONI toward solutions that would serve the best interests of all stakeholders. Unfortunately, despite those efforts on behalf of WDI, this proceeding has become necessary.” – p. 2 of 11 of WDI Supplementary Evidence

Interrogatory:

- a) For Reference 1 and 3, provide WDI’s detailed schedule for completing the connection and identifying all assumptions (e.g., municipal approvals, design, and construction).
- b) Provide any internal or external benchmarking studies WDI relied upon to support its claim of ‘faster service connection timelines’ in Reference 1.
- c) Provide documentation to substantiate Reference 2 and 4, specifically that the Town of

Wasaga Beach supports WDI as the service provider for the Subject Area.

- d) With respect to Reference 2, is WDI relying on any OEB Decisions or filing requirements to support how municipal preference should be considered in an SAA.
- e) With respect to Reference 4, is WDI relying on any OEB Decisions or filing requirements to support how shareholder preference should be considered in an SAA.
- f) With respect to Reference 4 and 5, please reconcile how shareholder ownership is a relevant consideration based on OEB Decisions or filing requirements that should be considered in this SAA.
- g) With respect to Reference 4, has the Town of Wasaga Beach requested connection in the Subject Area from WDI? If not, please clarify how WDI asserts the Town of Wasaga Beach would be the only confirmed permanent connection to be serviced on these developed lands.

RESPONSE

- a) Although WDI believes it can complete subdivision energization and subsequent home connections faster than HONI due to its local presence, WDI cannot speculate on the developer's construction schedule. If the developer elects to have its consultant complete the design, they control the pace of progress. WDI remains highly responsive and typically provides service layouts and coordination within a few business days. Municipal approvals are also dependent on the developer's submissions and other factors outside WDI's control. WDI's commitment is to ensure distributor readiness and timely execution once prerequisites are met.
- b) WDI did not rely on any formal internal or external benchmarking studies to support its claim of faster service connection timelines. The statement is based on WDI's operational experience and knowledge of typical service delivery timelines in the surrounding region, informed by many interactions with local developers, tradespeople, and stakeholders. Approximately 50% of WDI's staff live within HONI's surrounding service territory. The same builders and tradespeople work throughout the area, and local residents from the surrounding area regularly attend community events. Just last week, it was reported to WDI that it is taking HONI up to 5 weeks for a new service layout to be completed in the neighboring township. As of today, WDI would be able to turn a service layout around in 2 days. This observation is not intended to slight HONI, but rather to highlight that WDI's staff possess extensive, practical knowledge of the local and surrounding area, which should be considered.
- c) WDI and the Town have communicated on multiple occasions, and the Town has expressed its preference for WDI to serve the Subject Lands. These discussions occurred by phone and

email, not in written form. The Town of Wasaga Beach will be a customer at the Subject Lands - at minimum for streetlighting - and may require additional services for municipal assets. For further details, see OEB-Staff-2.

- d) This is a matter more properly addressed in argument.
- e) This is a matter more properly addressed in argument.
- f) This is a matter more properly addressed in argument.
- g) The Town of Wasaga Beach would be a permanent ratepayer, as at minimum, streetlighting services would be required to supply and maintain illumination within this development.

HONI-15:

References:

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

house, so with WDI, the design process and utility coordination aspect will be streamlined. " –
Primont Intervention Request, October 9, 2025

Interrogatory:

- a) At Reference 1, the Board determined alignment of service areas with municipal boundaries is not inherently beneficial for distribution system planning and may become increasingly irrelevant as consolidation and efficiency objectives advance. Please confirm whether WDI accepts this guidance, and if not, provide the basis for its disagreement.
- b) At Reference 2, WDI has stated that the lands at '400 45th Street fall within its licensed service territory because it is within the Town of Wasaga Beach, and at Reference 3, WDI states again that it has always understood this property to be part of its service area. Please reconcile the WDI statements at Reference 2 and 3 with the current effective OEB-approved WDI distribution licence, noted at Reference 4, that explicitly outlines that 400 45th Street is not within the service territory of WDI.
- c) Please confirm whether WDI acknowledges that its reliance on municipal boundaries and its own interpretation of its License is not aligned with the Board's guidance in Reference 1 and that customer interests are best served through efficiency and consolidation rather than municipal alignment. In your response, please explain how WDI's position from Reference 2 and 3 aligns with the OEB's statutory objectives.
- d) At Reference 5, please provide any documentation shared by WDI with Primont exchanged prior to the submission of Primont's evidence.

RESPONSE

- a) The environment and needs of distributors has evolved, and guidance from more than 20 years ago may not fully reflect current realities. WDI also emphasizes that not all situations are equal and should be assessed based as such. This proceeding is specific to 400 45th Street.
- b) The properties at 400 45th Street will be severed into over 600 distinct civic addresses in the Town of Wasaga Beach. See also OEB Staff-12.
- c) This is a matter better addressed in argument.
- d) See HONI-1 e).

HONI-16:

References:

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

Interrogatory:

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

RESPONSE

- a) The reference to “while mistakes can occur” in WDI’s Supplementary Evidence is intended as a general acknowledgment that, despite WDI’s strong commitment to transparency and integrity, administrative, regulatory, or clerical errors can occasionally occur. WDI recognizes that no organization is immune from such challenges - even large utilities, such as HONI, can make mistakes. This acknowledgment reflects WDI’s commitment to continuous improvement and its shared responsibility to ensuring consumers’ interest are protected.

WDI would also note that the period from 2020 to 2024 has been one of significant organizational changes, including a complete turnover of all senior management and approximately 50% of staff. This level of change inevitably resulted in a temporary loss of institutional knowledge and a learning curve for both new hires and internal promotions and mistakes have occurred.

WDI continues to rely on its partners and stakeholders to engage in open, honest, and collaborative communication - genuine partnerships that support shared success.

With respect to the reference suggesting that WDI’s “mistake” was an assumption that 400 45th Street would revert to WDI’s service territory, WDI wishes to clarify that it has always operated under the impression that this property would revert to WDI once developed. Accordingly, WDI would not characterize this as a mistake. See also OEB Staff-12.

HONI-17:

References:

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

Interrogatory:

- a) At Reference 1, please confirm whether WDI believes phasing the Subject Area is necessary for the purpose of electric servicing and installation of distribution system assets. If WDI does confirm, provide all documents, communications, and other information WDI relied on or received that support the following:
 - i. The assertion that the first phase will be on the south-east corner, and the earliest date WDI first learned of that proposal.
 - ii. The reasons WDI believes electrical servicing cannot be completed in a single phase.
- b) At Reference 2, please confirm Primont’s Intervenor Evidence was submitted to the OEB on October 8th, prior receiving the benefit of HONI’s Intervenor Evidence that was filed on October 17th, at Reference 3.
- c) At Reference 2, please confirm Primont’s submission is premised on the understanding that HONI cannot switch the load from the subject area to another circuit, which premise is incorrect, as per Reference 3.

RESPONSE

- a) At Reference 1, WDI does not believe phasing is necessary for the purpose of electric servicing and installation of distribution system assets. Our experience is that developments of this size are phased, and this was discussed with Primont's representative; however, this was not confirmed by Primont. For this reason, WDI used the wording "anticipated" and "should the first phase" in its submission. The actual approach will depend on the developer's build-out schedule and development plans.
- i. WDI does not assert that the first phase will be on the south-east corner; this was referenced as an anticipated possibility based on discussions with Primont's representative and based off of a review of the concept plans in which it illustrates the block references. WDI does not have a confirmed date when this proposal was finalized, as it was not formally communicated as a definitive plan.
 - ii. Our experience is that developments of this size are phased.
- b) Based on the OEB filing record, Primont's Intervenor Evidence appears to have been submitted on October 8, prior to HONI's Intervenor Evidence on October 17.
- c) WDI acknowledges that Primont's submission at Reference 2 includes its own assumptions regarding HONI's ability to switch load. We note that HONI's Intervenor Evidence at Reference 3 addresses this matter. WDI cannot speculate on Primont's understanding of this matter.

Appendices

- Appendix A – Email Communication with Developers
- Appendix B – 2025 AMO Presentation
- Appendix C – Discounted Cash Flow Summary
- Appendix D – WDI and OEB Letters Regarding OEB file No. EB-2016-0207
- Appendix E – WDI Letter to Account Executive at HONI
- Appendix F – Email Communications with Developers
- Appendix G – Debt to Equity Comparison
- Appendix H – WDI Engagement with HONI

APPENDIX A
Email Communication from Primont

From: [Daniel Bedford](#)
To: [Nanette Dupuis](#)
Cc: [Ian MacPherson](#); [Andrew Dixon](#)
Subject: Wasaga 45th Street - Service Area Amendment Request
Date: January 30, 2024 10:37:38 AM
Attachments: [2024-30-01 - EXECUTED - Service Area Amendment Request.pdf](#)

EXTERNAL SENDER: This email came from someone outside of the organization. Do not click the links or open any attachments unless you recognize the sender and know that the content is safe.

Good morning Nanette,

We have not spoken before, but it is nice to “meet” you. Your contact information was passed on to me from Andrew Dixon at Tatham Engineering. I believe you are the contact person for our Wasaga Beach project at 400 45th Street.

Please see attached Service Area Amendment request for your review and acceptance. The letter is in response to our future development being on the service area border. We are requesting WDI’s service area be amended to include this development.

This process is new to me, so please let me know if you require anything further. Can you provide me with a high-level overview; next steps; timing? What is the typical approval process at the Ontario Energy Board?

Regards,



Daniel Bedford Assistant Development Manager

O. 905-770-7002 Ext. 840 M. 416-856-4375

d.bedford@primont.com

9130 Leslie Street, Suite 301, Richmond Hill, ON L4B 0B9

primont.com

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From: [Tyler Ross](#)
To: [Nanette Dupuis](#)
Cc: [Daniel Stummer](#); [Michael Mehagan](#)
Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach
Date: September 16, 2025 3:58:09 PM
Attachments: [image001.png](#)

EXTERNAL SENDER: This email came from someone outside of the organization. Do not click the links or open any attachments unless you recognize the sender and know that the content is safe.

Good Afternoon Nanette,

Daniel Stummer and Primont have reviewed both HONI and WDI servicing options for their Wasaga Beach Development and would like to support WDI formally. Please let us know how we can assist WDI in working through the Service Area Amendment with the OEB.

Thank you,

Tyler Ross, P.Eng

DSEL

david schaeffer engineering ltd.

600 Alden Road, Suite 606
Markham, ON L3R 0E7

phone: (905) 475-3080

cell: (807) 355-0030

email: tross@DSEL.ca

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APPENDIX B
2025 AMO Presentation



TOWN OF WASAGA BEACH

2025 ASSOCIATION OF MUNICIPALITIES OF ONTARIO CONFERENCE



The longest freshwater beach in the world.



Town of Wasaga Beach 2022-2026 Council, from left: Councillor Richard White, Deputy Mayor Tanya Snell, Councillor Ellen Timms, Mayor Brian Smith, Councillor Joe Belanger, Councillor Faye Ego, Councillor Sasha-Rose Dileo.

**A place where
people love
to live is a
place where
people will
want to visit.**

Working together, the Province and Town of Wasaga Beach can leverage existing assets in our community, including Wasaga Beach Provincial Park, to grow tourism, create jobs and economic opportunities, and make life better for our full-time residents – for years to come.

As we look ahead to the 2026 fiscal year, we are encouraged by the alignment of our priorities. We look forward to your continued partnership, funding, and support to build a more complete community and a stronger Ontario.



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Building 288 Long Term Care Units Faster	9
Building Better Municipal Police Services	11
Building Public Energy Infrastructure to Build Faster	13
Building Destination Wasaga	15



SUMMARY OF ASKS

✓ 1. Building 3,600 Homes Faster

That the Province and Ministry of Infrastructure support Wasaga Beach's efforts to build more homes faster in the town's west end, and keep development near the beachfront and in our east end moving forward as follows:

- **Introduce** fast-track funding – in the form of grants or zero-interest loans – for Housing-Enabling Infrastructure, to resolve unintended consequences of Bill 17
- **Provide** the municipality with **\$35 million** to plan and build a water tower, including necessary site servicing and drainage works, which will unlock more than 3,600 homes and commercial development in our fast-growing west end.

✓ 2. Building 288 Long Term Care Units Faster

That the Province and Ministry of Long-Term Care support the Town of Wasaga Beach's efforts to relieve pressure on our regional hospitals and help resolve the issue of long-term care (LTC) facility waitlists in our region that are hundreds of people long:

- **Provide** support and funding to help unlock a shovel-ready project to build 288 long-term care units over the next 2 to 3 years. This would become **the largest LTC investment in the history of our community** and the South Georgian Bay region.

✓ 3. Building Better Municipal Police Services

The Mayor of Wasaga Beach is the appointed Chair of the Board at the Huronia West OPP Detachment Board. The Board has raised concerns with the Solicitor General's office regarding the revolving door of senior-level leadership at the Huronia West Detachment. The Board and municipality believe this relatively high employee turnover at such senior levels undermines the continuity of policing priorities and impacts service levels and recruitment. The Board, in alignment with current legislation, asks that the Solicitor General:

- Provide **clarity** regarding the role of Detachment Boards in matters of planning, priority setting, and succession planning, and an update on Detachment Board **funding**.
- Receive the Huronia West Board's concerns regarding the need for more open and consistent **lines of communication** between the Board and OPP Commissioner, and senior leadership.

✓ 4. Building Public Energy Infrastructure to Build Faster

That the Province and Ministry of Energy support Wasaga Beach's efforts to speed up new development and home construction by removing red tape, and amending current regulations that make it harder for the Town's independent, municipally-owned utility to build out capacity "**where we need it, when we need it.**"

The mandate of Wasaga Distribution Inc. (WDI) is to build more homes faster and service the Town's high rate of growth, which is four times higher than the provincial average. WDI is publicly accountable. WDI's priorities reflect the priorities of the Town and Council, which reflect provincial priorities.

Provincial Action:

- **Establish** provincial infrastructure funding programs for high-growth LDC service areas for upstream capacity-related infrastructure. This could align with provincial housing targets to ensure timely delivery of electricity infrastructure in high-growth areas.
- **Allow** rate-setting mechanisms or exemptions that enable quicker investment responses.
- **Take action** to ensure Hydro One works in genuine partnership with local LDCs to avoid unnecessary duplication of assets and costs. "Collaborate or get out of the way."

Provincial Direction to the OEB:

- **Enable** rate-setting mechanisms - such as Return on Equity true-ups or standard rates for efficiently benchmarked utilities - that reward high-performing distributors and allow flexibility, to accelerate necessary infrastructure build-out.
- **Encourage** the OEB to adopt a Capacity Development or "**Powering More Homes Faster**" fee to support growth-related infrastructure.
- **Amend** the SAA, giving greater weight to municipal/township preference.
- **Resolve** legacy issues that result in system inefficiencies and impact reliability and affordability.

SUMMARY OF ASKS continued...

✓ 5. Building Destination Wasaga

That the Province, Ministry of Tourism, Culture and Gaming (MTCG) and Ministry of the Environment, Conservation and Parks (MECP) continue to support the Town's efforts to evolve into a year-round, iconic recreation and nature-based destination, and build Destination Wasaga, by working together to unlock

The Power of 10:

- **Collaborate with the Town on enhancements to the existing Nordic Trail Centre**, which is part of Wasaga Beach Provincial Park, that would enable it to become a world-class addition to our region's winter sport and ski experiences – situated between three of the most prominent family winter resorts in Georgian Bay, Ontario: Blue Mountain Resort, Horseshoe Valley Resort and Mount St. Louis. **Wasaga Beach Provincial Park offers some of the most exciting Nordic ski terrains in Central Ontario with over 30 kilometers of groomed trails but it lacks investment, programming, and awareness.**
- **Partner** with the Town on a plan to reinvent **100 acres** of municipal land to create **Ontario's first tree-top provincial campground** (inspired by the *Oasis sites offered at Trent-Severn Waterway National Historic Site*). The perfect adventure getaway for couples, small families and paddlers.
- **Collaborate** with the Town on a plan to elevate the visitor experience within the forested trails and dunes of Wasaga Beach Provincial Park with educational wayfinding, accessible boardwalks, and a **Wasaga Beach Provincial Park Skywalk** at the Monument Hill Lookout area, located within the park boundary.
- **Leverage Gateway Wasaga Casino** to drive tourism and economic development, create jobs and help build Destination Wasaga. The existing Gateway casino in Wasaga Beach is high-performing. The location that was selected by Gateway is on the periphery of our town and appeals primarily to locals, which has provided a steady and consistent revenue stream. The current casino location is missing out on Wasaga Beach's tourist market. Relocate the existing casino or build a satellite casino in our primary investment zone near the beachfront that can capture a portion of Wasaga Beach's 2+ million visitor segment.



BUILDING 3600 HOMES FASTER

West Wasaga Secondary Plan

OUR ASK

That the Province and Ministry of Infrastructure support the Town of Wasaga Beach’s efforts to build 3,600 homes faster through its West Wasaga Secondary Plan by:

- Introducing fast-track funding — in the form of **grants or zero-interest loans** — for Housing-Enabling Infrastructure, to resolve the unintended consequences of Bill 17.
- The Town is asking for **\$35 million** to plan and build a water tower, including necessary site servicing and drainage works, which will unlock more than 3,600 homes and commercial development in our fast-growing west end.

Our Opportunity

- The Town of Wasaga Beach is bucking provincial trends — there is a **full development pipeline** and construction is moving forward near the beachfront.
- The Town has always been vigilant and planned carefully for future growth.
- About one-third of all future growth and home construction is expected to happen in the town’s west end.
- We can take action now to ensure that a water tower will come online at the right time to ensure no delays in development projects and home construction in the west end.

+33%
of all future growth and housing construction will happen in the Town’s west end

Why is this important?

- Wasaga Beach is one of Ontario’s fastest-growing municipalities, with a growth rate four times the provincial average.
- Provincial support for the Town’s **West Wasaga Secondary Plan** will accommodate future growth in a strategic, coordinated way that will help the Town develop into a complete community, attract jobs and investment, and protect the Town’s only employment lands.
- This will enable the Town of Wasaga Beach to continue to **meet bold provincial housing targets** and build a stronger Ontario.

ALIGNING WITH PROVINCIAL PRIORITIES

Supports the Province’s budget commitment for infrastructure projects, and is in alignment with the government’s priorities of growing tourism, building a stronger economy, building more homes faster, and investing in housing-enabling infrastructure that will ensure municipalities can continue to support future growth.

BUILDING 288 LONG TERM CARE UNITS FASTER

OUR ASK

That the Province and Ministry of Long-Term Care support the Town of Wasaga Beach's efforts to relieve pressure on our regional hospitals and help resolve the issue of long-term care facility waitlists in our region that are hundreds of people long by:

- Providing support and funding to help unlock a shovel-ready project to build 288-unit long-term care (LTC) home in Wasaga Beach. With provincial support this long-term care project can be completed within 2 to 3 years.

Why is this important?

- With support from the Province, this project is ready to move forward.
- This project will relieve pressure on local health and community support services: There are no LTC homes currently serving seniors and their families in Wasaga Beach – the closest LTC home is **13 km** away.
- **This would become the largest LTC investment in the history of our community – and the South Georgian Bay region.**

288 rooms

The largest LTC investment in the history of Wasaga Beach and the South Georgian Bay Region

34.7%

percentage of residents in Wasaga Beach area over the age of 65

Our Opportunity

- peopleCare has a track record of accelerating LTC developments and delivering new LTC homes.
- For instance, they opened new 128-bed homes in **Meaford** (2022) and **Tavistock** (2024) in under 2 years.
- In 2025, the company has already welcomed residents to new 128-bed homes in **Kitchener** and **Delhi**, and will have projects underway in **Tillsonburg** (160 beds), **Stratford** (288 beds) and **Peterborough** (224 beds).
- A new peopleCare LTC home in Wasaga Beach would meet urgent care needs, create local jobs, stimulate the economy and increase **affordable housing** capacity (given that 40% of LTC beds are available at reduced rates).
- This partnership brings together peopleCare's financing, capability, industry-leading development network, partnerships, experience, to build a modern five-storey, 288-bed LTC home in Wasaga Beach.



CLARIFYING THE ROLE OF O.P.P. DETACHMENT BOARDS

BUILDING BETTER MUNICIPAL POLICE SERVICES

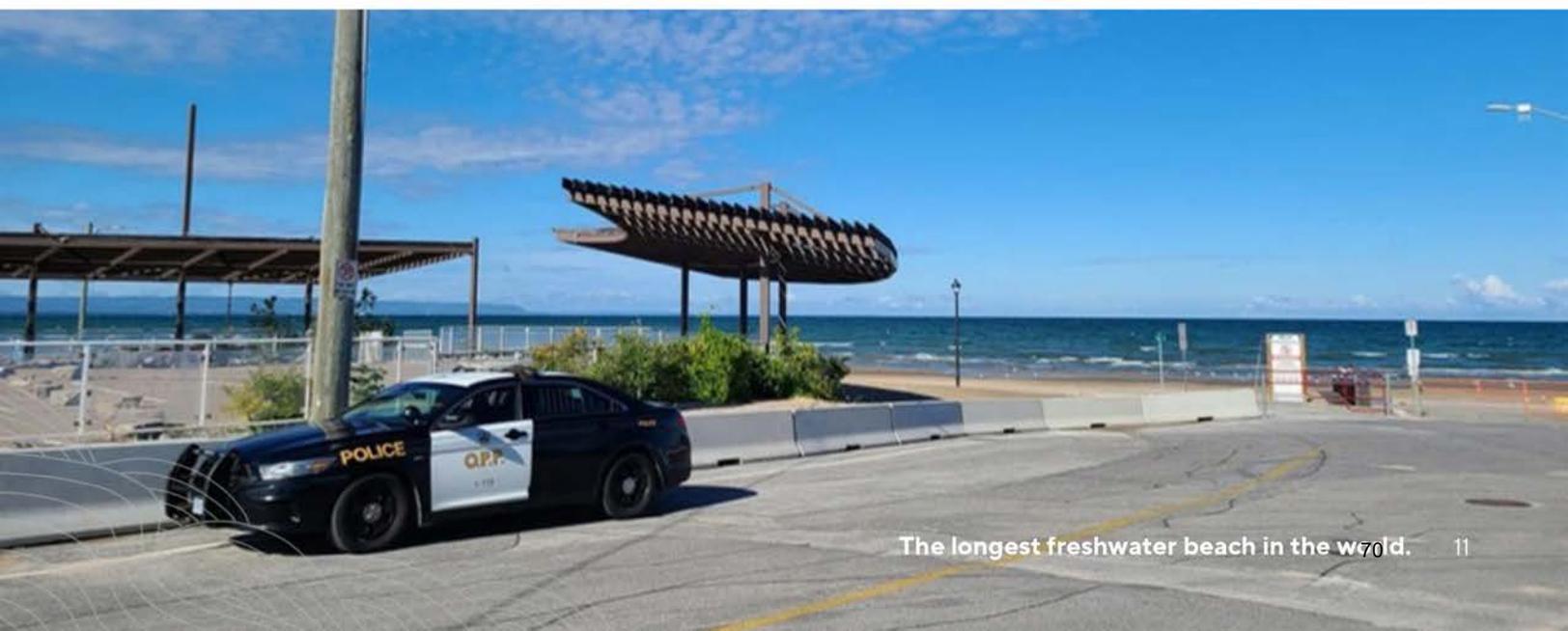
Clarifying the Role of O.P.P. Detachment Boards

The Mayor of Wasaga Beach is the appointed Chair of the Board at the Huronia West OPP Detachment Board. The Board has raised concerns with the Solicitor General's office regarding the revolving door of senior-level leadership at the Huronia West Detachment. The Board and municipality believe this relatively high employee turnover at such senior levels undermines the continuity of policing priorities and impacts service levels and recruitment.

OUR ASKS

The Board, in alignment with current legislation, asks that the Province and Solicitor General:

- Provide clarity regarding the role of Detachment Boards in matters of **planning, priority setting, and succession planning**.
- Receive the Huronia West Board's concerns regarding the need for more open and consistent lines of **communication** between the Board and OPP Commissioner, and senior leadership.
- Provide an update on Detachment Board **funding**, if possible.





BUILDING PUBLIC ENERGY INFRASTRUCTURE TO BUILD HOMES FASTER

OUR ASK

That the Province and Ministry of Energy support Wasaga Beach’s efforts to speed up new home construction—and prepare for a high amount of growth in the town’s west end—by removing red tape and amending current regulations that make it harder for the Town’s independent, municipally-owned utility to build out capacity “where we need it, when we need it.”

How does this support provincial priorities?

- Part of the mandate of Wasaga Distribution Inc. (WDI) is to help build more homes faster and service the Town’s high rate of growth, which is four times higher than the provincial average.
- WDI is publicly accountable. WDI’s priorities reflect the priorities of the Town and Council, which reflect provincial priorities, which are to get more homes built.

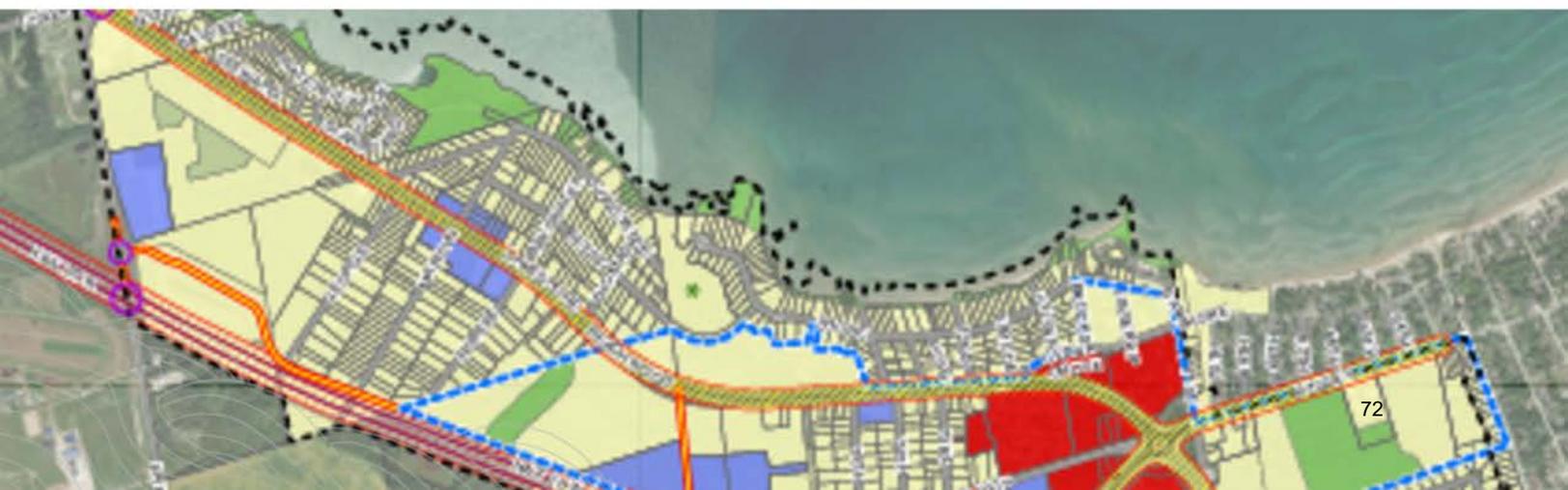
“To service planned home construction in our west end, we either need greater cooperation — or to be able to service the area.”

3600

Projected number of homes to be built in the west end of Wasaga Beach

+33%

of all future growth and housing construction is expected to happen in the Town’s west end



Building Public Energy Infrastructure to Build Faster

OUR ASK

✓ Ensuring Utility Infrastructure Keeps Pace with Housing Development

The current regulatory and funding environment does not support the timely build-out of utility infrastructure needed for new housing. Rising inflation, growth pressures, and cost recovery limitations create funding gaps that hinder development readiness. Small and mid-sized LDCs in high-growth areas like **Wasaga Beach** also face unique regulatory and financial barriers that delay investment in needed infrastructure.

Provincial Action:

- **Establish provincial infrastructure funding programs for high-growth LDC service areas** for upstream capacity-related infrastructure. This could align with provincial **housing targets** to ensure timely delivery of electricity infrastructure in high-growth areas.
- **Allow rate-setting mechanisms or exemptions** that enable quicker investment responses.
- Introduce legislative and policy measures to **reduce regulatory burden**, focusing on streamlining processes that do not directly improve reliability or service.

Provincial Direction to the OEB:

- **Enable rate-setting mechanisms** - such as Return on Equity true-ups or standard rates for efficiently benchmarked utilities - that **reward high-performing distributors** and allow flexibility, to accelerate necessary infrastructure build-out.
- **Encourage the OEB to adopt a Capacity Development or “Powering More Homes Faster”** fee to support growth-related infrastructure.

Amending the Service Area Amendments and Resolving Legacy Barriers

✓ The current Service Area Amendment (SAA) framework is inefficient. In Wasaga Distribution’s case, a lack of alignment with municipal boundaries stems not only from legacy Ontario Energy Board (OEB) policies on Long-Term Load Transfers, but also from historical annexations dating back to 1976. These issues are leading to inefficiency in the system build-out and creating duplication of infrastructure, and higher costs. We are concerned that they could also result in potential project delays. The problem is compounded when the provincial distribution company does not work in genuine partnership with Local Distribution Companies (LDCs), limiting our ability to plan and deliver electrical servicing efficiently to keep development and home construction moving.

Provincial Action:

- **Take action** to ensure Hydro One works in genuine partnership with local LDCs to avoid unnecessary duplication of assets and costs. “Collaborate or get out of the way.”

Provincial Direction to the OEB:

- **Amend the SAA, giving greater weight to municipal/township preference.**
- Address legacy issues that result in system inefficiencies and impact reliability and affordability.

Duplication of distribution assets in areas where growth has outpaced original plans creates inefficiencies, limits reliability improvements, and increases costs.

BUILDING DESTINATION WASAGA

Re-Imagining Our Beachfront &
Wasaga Beach Provincial Park
To Strengthen Our Economy
And Ignite Tourism in Ontario

OUR ASKS

That the Province, Ministry of Tourism, Culture and Gaming (MTCG) and Ministry of the Environment, Conservation & Parks (MECP) support Wasaga Beach's efforts to attract investment and build Destination Wasaga—by unleashing *The Power of 10*.

The Power of 10 creates a simple but profound benchmark: A great place needs to have at least 10 dependable things to do in it or 10 reasons to be there. A world-class destination must offer 10 world-class things to see and do.

Our approach is thoughtful. Imagine layers of experience that complement and connect two distinct visitor zones in our community.



1 Beachfront Zone (Waterfront Master Plan)

2 Adventure, Eco-Tourism & Environmental Education Zone

✓ Proposed site of Ontario's first tree-top provincial campground, accessible by canoe/kayak/SUP, hiking and car

THE POWER OF 10

Building Destination Wasaga

- 

1 Shoreline Trail
- 

5 Year Round Synthetic Sledding Trail
- 

9 Tree Top Provincial Campground
- 

2 Open Air Gondola to link both zones
- 

6 Accessible Trails & High-Density Boardwalk
- 

10 Smart Harbour
- 

3 Suspension Pedestrian Bridge
- 

7 Mushroom Hill Sky Walk
- 

4 Noroak Centre - Noroak Sprint Track
- 

8 Canada's Longest Zip Line



OUR ASK

Collaborate with the Town on enhancements to the existing **Nordic Trail Centre**, which is part of Wasaga Beach Provincial Park, that would enable it to become a world-class addition to our region's winter sport and ski experiences – situated between three of the most prominent family winter resorts in Georgian Bay, Ontario: **Blue Mountain Resort, Horseshoe Valley Resort** and **Mount St. Louis**. Wasaga Beach Provincial Park offers some of the most exciting Nordic ski terrains in Central Ontario with over **30 kilometers of groomed trails**, but it lacks investment, programming, and awareness. **#imagine**

OUR ASK

Partner with the Town on a plan to **reinvent 100 acres** of municipal land to create **Ontario's first tree-top provincial campsite** (inspired by the Oasis sites offered at Trent-Severn Waterway National Historic Site). The perfect adventure getaway for couples, small families and paddlers. This aligns with the Town and Province's shared vision to create Destination Wasaga. **#imagine**



OUR ASK

Work with the Town on a plan to elevate the visitor experience within the forested trails and sand dunes of Wasaga Beach Provincial Park with educational wayfinding, accessible boardwalks, and a Wasaga Beach Provincial Park Skywalk at the Monument Hill Lookout area, located within the park boundary.

#imagine







Leverage Gateway Wasaga Casino to drive tourism and economic development, create jobs and help build Destination Wasaga.

- The existing **Gateway** casino in Wasaga Beach is high-performing.
- The location that was selected by Gateway is on the periphery of our town and appeals primarily to locals, which has provided a steady and consistent revenue stream.
- At its height, Wasaga Beach attracted more than 4 million tourist trips per year. Currently we are attracting approximately 2 million visitors a year with plans to significantly increase visitation through strategic investments in tourism infrastructure. The current casino location is missing out on the tourist market.
- Wasaga Beach has recently announced that a premium **Marriott Hotel** will be built on Beach Drive near the beachfront, with shovels in the ground in 2026.
- In addition, with the proposed transfer of about 60 acres of provincial beachfront land from the Province to the Town, there is an opportunity to invest in other tourism anchors that will drive year-round visitation.

OUR ASK

- **Relocate** the existing casino or build a **satellite casino** in our primary investment zone near the beachfront that can capture a portion of this huge visitor segment. As a companion or in collaboration with the Marriott, this will help advance our shared goal of creating a vibrant year-round tourist destination on the world's longest freshwater beach.





APPENDIX C
Discounted Cash Flow Summary

Discounted Cash Flow - Summary (WDI Beneficiary Pay - Standard)

	In-Service Date	<----- Project year ended - annualized from In-Service Date ----->					
	Nov-1 <u>2025</u>	Nov-1 <u>2026</u>	Nov-1 <u>2027</u>	Nov-1 <u>2028</u>	Nov-1 <u>2029</u>	Nov-1 <u>2030</u>	Nov-1 <u>2031-2065</u>
Total Connections	0	367	504	570	622	655	655
Total Incremental Energy (kWh/month) - for energy billed rate classes	0	230,516	316,567	358,023	390,684	411,412	411,412
Total Incremental Demand (kWh/month) - for demand billed rate classes	0	0	0	0	0	0	0
Gross Revenue - \$K annual	0.0	126.3	173.5	196.2	214.1	225.4	225.4
OM&A Costs - \$K	0.0	(100.1)	(137.5)	(155.5)	(169.6)	(178.6)	(178.6)
Ontario Capital Tax and Municipal Tax - \$K	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Operating Cash Flow (before taxes) - \$K	<u>0.0</u>	<u>26.2</u>	<u>36.0</u>	<u>40.7</u>	<u>44.4</u>	<u>46.8</u>	<u>46.8</u>
Total Upfront Capital Expenditures - \$K	(2,181.6)						
Standard Basic Connection Fee - \$K	140.4						
Developer Contributed Capital - \$K	1,132.2						
Required Expansion Deposit - \$K	909.0						
Estimated Per Connection Refund - \$K	1.4						

APPENDIX D
WDI and OEB Letters
Regarding OEB file No. EB-2016-0207

Ontario Energy
Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto ON M4P 1E4
Telephone: 416- 481-1967
Facsimile: 416- 440-7656
Toll free: 1-888-632-6273

Commission de l'énergie
de l'Ontario
C.P. 2319
27e étage
2300, rue Yonge
Toronto ON M4P 1E4
Téléphone: 416- 481-1967
Télécopieur: 416- 440-7656
Numéro sans frais: 1-888-632-6273



BY E-MAIL j.tackaberry@wasagadist.ca

April 28, 2016

Joanne Tackaberry
Director of Finance
Wasaga Distribution Inc.
950 River Rd. W.
Wasaga Beach, ON L9Z 1A2

Dear Ms. Tackaberry:

**Re: Elimination of Load Transfer Arrangements
OEB File No.: EB-2015-0006**

This letter is in response to your April 5, 2016 letter in which you were seeking the Ontario Energy Board's (OEB) interpretation as to whether Wasaga Distribution Inc. (WDI), the geographic distributor in a Load Transfer (LT) Arrangement, can keep the customer under the provisions of the DSC.

In your case and the ones similar to what you described in your April 5, 2016 letter, the OEB requires confirmation and evidence that the expansion plan(s) had been planned and approved prior to December 21, 2015, and that the work would be completed by June 21, 2017. This typically would be demonstrated by the approved business plan containing this project within your asset management plan or alternatively, by an evidence, e.g. a connection agreement (specifying a planned connection date) signed or at least negotiated prior to December 21, 2015, with a developer. Either of these would show that the distributor is in the process of eliminating the LT Arrangement, prior to the code change coming into force.

If such conditions apply, Wasaga Distribution may request for an exemption as part of the applicable Service Area Amendment (SAA) application and submit evidence that the expansion was planned and approved prior to December 21, 2015.

Note that if this work has not been “approved” to be executed, the transfer of customers will need to be completed. In the future, if the expansion development does proceed, the distributor can file for a new SAA to expand their service territory and recapture the customer(s), on the basis of a regular SAA application process.

Yours truly,

Original Signed By

Peter Fraser

Vice President, Industry Operations and Performance
Ontario Energy Board



P.O Box 20, 950 River Road West, Wasaga Beach, Ontario L9Z 1A2
Tel: (705) 429-2517 Fax: (705) 429-2590 E-mail: hydro@wasagadist.ca

April 05, 2016

Mr. Peter Fraser,
V.P. Industry Operations & Performance
Ontario Energy Board
Suite 2700, 2300 Yonge Street
Toronto, ON
M4P 1E4

RE: Seeking Guidance on Interpretation of Code Amendment, LTLT (EB-2015-0006)

Dear Sir,

Wasaga Distribution Inc. (WDI) is seeking your guidance on the Code Amendments to the Long Term Load Transfer OEB File EB-2015-0006.

Wasaga Distribution is the geographical distributor of one customer under a current LTLT and Hydro One is the physical distributor. Under the revisions to the *Distribution System Code*, Section 6.5.3, states the following:

"All load transfer arrangements shall be eliminated by transferring the load transfer customers to the physical distributor by June 21, 2017. The geographic distributor shall apply to the Board for a service area amendment to the necessary licence(s) to effect the transfer."

The issuance of the paper on December 21, 2015 by the OEB that accompanied the Final Amendments to the Distribution System Code stated the following on page 3 under Section D. OEB Response to Other Comments Received:

"It was suggested that, if an expansion that would connect the load transfer customers had been approved before the final amendments are issued, the load transfer should not need to be eliminated. The OEB agrees with this suggestion as the load transfer will be eliminated without the need for approval of any incremental costs. In such cases, a request for an exemption can be made by distributors as part of the applicable SAA application. However, any request for an exemption will need to be accompanied by evidence that the expansion was approved by the OEB before the final amendments were made."

Wasaga Distribution Inc. is seeking guidance as it relates to the above paragraph. Wasaga Distribution filed its' Rate Application (EB-2015-0107) on September 25, 2015 well before the LTLT amendments to the DSC. In WDI's application within its Miscellaneous Capital additions WDI included in rates the assets required to connect one of the LTLT customers that is physically distributed by Hydro One at a cost of approximately \$20,000. Wasaga Distribution Inc.'s rates were approved with the Final Decision & Order on March 24, 2016.



P.O Box 20, 950 River Road West, Wasaga Beach, Ontario L9Z 1A2
Tel: (705) 429-2517 Fax: (705) 429-2590 E-mail: hydro@wasagadist.ca

Hydro One is of the opinion that under Section D. OEB Response to Other Comments received, WDI has not met the criteria of eliminating this LTLT before December 15, 2015; therefore, Hydro One as the physical distributor will keep the customer. WDI feels that because: 1) WDI's Rate Application was filed before December 15, 2015 2) WDI is ready to connect this customer and 3) the costs to connect this customer are included in rates, WDI feels that this customer should be retained by WDI.

Therefore, Wasaga Distribution is seeking your interpretation as to whether WDI can keep this customer under the Distribution System Code.

Yours truly,

A handwritten signature in black ink that reads "Joanne Tackaberry". The signature is written in a cursive style.

Joanne Tackaberry, CPA, CGA
Director of Finance
For: Paul Trace, CET
Director of Operations

Cc: Mr. Andres Mand,
Manager, Regulations & Liaison, OEB
Aarani Pathmanathan, Hydro One

APPENDIX E

WDI Letter to Account Executive at HONI

April 2, 2025



April 2, 2025

Erfan Hajian
Account Executive
Hydro One Networks Inc.
483 Bay Street,
Toronto, ON, M5G 2P5

Subject: Request for Consent – Service Area Amendment for 400 45th Street South, Wasaga Beach

To Whom it May Concern,

I hope this letter finds you well. Wasaga Distribution Inc. ("Wasaga Distribution") will be submitting an application to the Ontario Energy Board (OEB) to amend our service area to include the development located at 400 45th Street South, Wasaga Beach. We are formally requesting Hydro One's consent to this amendment as part of the OEB's regulatory process.

As you are aware, Wasaga Distribution completed a service territory amendment in 2017 as part of the Long-Term Load Transfer (LTLT) elimination process, which was a regulatory requirement "under the principles to minimize rate impacts for load transfer customers and prevent unnecessary costs associated with uneconomic distribution system expansions solely to connect these customers". It was clearly understood at that time that this parcel of land would revert to Wasaga Distribution's service area upon development. With development now planned, we need to ensure that the service area alignment reflects the original agreement and that the same principles guiding the 2017 process continue to apply in this situation.

Wasaga Distribution's position is firm in that:

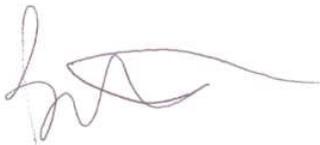
- **Customer Rates & Cost Savings:** Wasaga Distribution's distribution rates are significantly lower than those of Hydro One. Customers within this development should not be subjected to unnecessarily high rates when a more economical option exists.
- **Reliability & Service Standards:** Our infrastructure is already in place, capable of serving this area, which has demonstrated superior reliability, relative to the surrounding area. During this past weekend's ice storm impacting central Ontario, Wasaga Distribution was able to restore power within 12 hours to all of its customers, whereas directly adjacent Hydro One-serviced areas remained without power for more than four days.

- **Regulatory Alignment & Historical Agreements:** This amendment will align with the 2017 regulatory intent and ensures that Wasaga Distribution's service area is restored in accordance with previously recognized boundaries.
- **Customer Preference:** The developer of this site has provided formal documentation expressing a clear preference for Wasaga Distribution as the electricity provider.

We expect Hydro One to acknowledge the regulatory and operational rationale behind this amendment and provide its consent in a timely manner. If further discussion is required, we are open to arranging a meeting at the earliest convenience. However, we firmly believe that this amendment is in the best interest of customers, aligns with regulatory precedent, and should proceed without unnecessary delay or any further unnecessary expenditures.

We appreciate Hydro One's cooperation in this matter and look forward to your prompt response.

Sincerely,
Brandon Weiss
President & CEO
Wasaga Distribution Inc.

A handwritten signature in blue ink, appearing to read 'BW', with a long horizontal flourish extending to the right.

Brandon Weiss,
President & Chief Executive Officer, Wasaga Distribution Inc.

cc: Nanette Dupuis, Manager of Engineering

APPENDIX F

Email Communications with Developers

From: Jordan Goss
Sent: July 10, 2025 1:29 PM
To: 'Tyler Ross' <tross@oues.ca>; Nanette Dupuis <n.dupuis@wasagadist.ca>
Cc: Brandon Weiss <b.weiss@wasagadist.ca>; Roy Rogers <r.rogers@wasagadist.ca>; Michael Mehagan <mmehagan@oues.ca>
Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

Good afternoon Tyler,

Please find attached our preliminary CAD file. All proposed equipment locations are subject to confirmation based on the final civil and architectural plans. Let me know if you have any issues opening the file.

Our underground distribution cable is 2/0 AWG aluminum, and we have 556 aluminum overhead conductors running along Morgan Road toward Wedgewood Drive. All other cable sizes are indicated on the drawing, including those in the surrounding areas. We haven't shown any open points at this stage, but we normally would place them at PMH units or junction boxes.

Feel free to reach out if you have any questions or need other information.

Regards,

Jordan Goss, C.E.T.

Engineering Technologist | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | j.goss@wasagadist.ca

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From: Tyler Ross <tross@oues.ca>
Sent: July 10, 2025 10:36 AM
To: Nanette Dupuis <n.dupuis@wasagadist.ca>
Cc: Brandon Weiss <b.weiss@wasagadist.ca>; Roy Rogers <r.rogers@wasagadist.ca>; Jordan Goss <j.goss@wasagadist.ca>; Michael Mehagan <mmehagan@oues.ca>
Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

EXTERNAL SENDER: This email came from someone outside of the organization. Do not click the links or open any attachments unless you recognize the sender and know that the content is safe.

Good Morning Nanette,

I hope all is well and you are enjoying the summer!

I removed Primont and Tim from the thread.

We are just jumping into the site as well, and I was hoping you would be able to provide some insight on a few items so Michael and I can get a baseline understanding of how the site can be serviced:

- Can you confirm that the site would be serviced from 4.8kV?
- What is WDI's primary distribution philosophy for a site of this size with switchgears involved? Does WDI like the 200A loops to terminate in gears, or is there flexibility to terminate the 200A on poles or gears?
- Assuming it is 4.8kV and 50kVA, does WDI put 18 transformers per phase?
- Can you provide the adjacent subdivision drawings so we can get familiar with the area?

I am available all day and all morning tomorrow if you would like to have a quick call. I also live in the area and can meet you at the office if that would be beneficial.

Thank you,



Tyler Ross, P.Eng.

Managing Partner

tross@oues.ca

(807) 355-0030

www.oues.ca

From: Nanette Dupuis <n.dupuis@wasagadist.ca>
Sent: July 10, 2025 9:35 AM
To: Daniel Stummer <daniel@primont.com>
Cc: Brandon Weiss <b.weiss@wasagadist.ca>; Roy Rogers <r.rogers@wasagadist.ca>; Jordan Goss <j.goss@wasagadist.ca>; Tyler Ross <tross@oues.ca>; Michael Mehagan <mmehagan@oues.ca>; Tim Edmondson <TEdmondson@dsel.ca>; Ian MacPherson <ian@primont.com>
Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

Good morning, Daniel.

Thank you for the information—it's greatly appreciated.

I wanted to bring you up to speed on our end regarding our Offer to Connect (OTC).

At this time, we have not issued an OTC because the lot fabric is still subject to change pending finalization of the Plan of Subdivision. Additionally, completing the electrical distribution design requires coordination with your civil, architectural, and landscape consultants to avoid conflicts prior to construction and to ensure proper alignment with joint trench utilities.

That said, we've prepared a preliminary cost estimate based on the initial servicing information and general layout provided by Tathem, and we'd appreciate the opportunity to review it with you.

We continue to believe that WDI offers a highly competitive and flexible approach that can support your project goals effectively:

- **Flexible phasing** – We can issue separate OTCs and administer associated deposits on a per-phase basis. This allows for planning flexibility and supports more manageable cash flow as the project advances.
- **Support** – There is strong community interest in seeing this development move forward with WDI. We also understand that Paul Federico has expressed his support for WDI and for ensuring timely progress on this project.

We'd welcome the opportunity to meet and discuss project timelines, how we can best meet your needs, and ensure the most efficient and cost-effective outcome. Please let us know your availability for a meeting in the coming days.

Kind regards,

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | n.dupuis@wasagadist.ca

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From: Daniel Stummer <daniel@primont.com>

Sent: Wednesday, July 9, 2025 12:31 PM

To: Nanette Dupuis <n.dupuis@wasagadist.ca>

Cc: Brandon Weiss <b.weiss@wasagadist.ca>; Roy Rogers <r.rogers@wasagadist.ca>; Jordan Goss <j.goss@wasagadist.ca>; Tyler Ross <tross@oues.ca>; Michael Mehagan <mmehagan@oues.ca>; Tim Edmondson <TEdmondson@dsel.ca>; Ian MacPherson <ian@primont.com>

Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

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Hi Nanette,

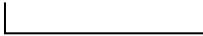
I wanted to provide a quick update on the project.

I've taken over as the Project Manager for this proposed development and will be your main point of contact moving forward. In addition, DSEL has now taken over from Tatham as the Electrical Engineer for the project.

The main contacts at DSEL will be Tyler Ross and Tim Edmondson (cc'd here). Please include them in any future correspondence related to electrical engineering matters - Tyler will follow up with any questions he has on this matter.

Looking forward to working with you. Please don't hesitate to reach out if you have any questions.

Much appreciated,



DANIEL STUMMER Development Manager
T 905 770 7002 x 846 C 416 219 7447 E daniel@primont.com
9130 Leslie St. Suite 301, Richmond Hill, ON L4B 0B9
primont.com

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From: Nanette Dupuis <n.dupuis@wasagadist.ca>
Sent: July 3, 2025 9:43 AM
To: Andrew Dixon <adixon@tathameng.com>; Paul Federico <pfederico@sterlinggroupcorp.com>
Cc: Brandon Weiss <b.weiss@wasagadist.ca>; Roy Rogers <r.rogers@wasagadist.ca>; Jordan Goss <j.goss@wasagadist.ca>
Subject: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

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Good morning, Paul and Andrew,

I hope you're enjoying the summer so far. I just wanted to give you a quick heads-up that I'll be sending over a formal letter shortly regarding the electrical servicing for 400 45th Street South.

As you know, we've been in ongoing discussions with Hydro One for some time now, trying to work through a fair and transparent process to determine which distributor will service the property. Unfortunately, we've encountered several challenges — including delays, inconsistent cost scopes, and a lack of clarity around civil and inspection costs on their end.

Here's a quick preview of where things stand:

- Our total estimate was \$3.69M, including inspection and \$1.52M for civil work.

- Hydro One's \$2.4M estimate excluded both civil and inspection costs. They later indicated that inspection costs alone would be approximately \$90,000.
- Once those costs are factored in, their effective cost is actually higher — and based on our understanding, their design is less robust and not as well prepared for future needs.

We've made several attempts to re-engage Hydro One since March but haven't made any progress. As a result, we're planning to move forward with a Service Area Amendment application to the OEB without their consent.

The formal letter will outline these details and ask for confirmation on a few items — including that WDI remains the preferred distributor and that we have the correct contact information for both property owner and developer.

For context: 400 45th Street South is located within the Town of Wasaga Beach and has historically been part of our service territory, as established when our utility was formed. At the time, the property was a farm and temporarily served by Hydro One from 45th Street, which created a long-term load transfer — Hydro One provided the service, but we reconciled the load annually.

In 2016, the OEB mandated that all long-term load transfers be eliminated, with customers assigned to the utility physically supplying them. Now that the farm service has been removed and the development will be fed from our infrastructure on Morgan Road (we're we have infrastructure), we're looking to reintroduce the property into our designated service territory — as originally intended.

Additionally, we're working with a new supplier and may be able to reduce our costs further. Once confirmed, we'll be ready to present an Offer to Connect should you wish to proceed.

If you have any questions or would like to connect before the letter goes out, feel free to reach out anytime.

Best regards,

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | n.dupuis@wasagadist.ca

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From: [Paul Federico](#)
To: [Nanette Dupuis](#)
Subject: RE: 400 45th Street South - Wasaga Distribution Service Area Amendment Application
Date: August 21, 2025 10:53:46 AM
Attachments: [image001.png](#)

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Many thanks. The feelings are mutual.

By the by, on a separate note, maybe we can get together in the coming months to talk about Theme Pk and Wally Dr. Our proposal for 6 apartment buildings has been submitted to the Town. Because we will be building it in phases, I'm wondering at what point do we reach a pinch point with power availability. Would love to chat further about it. I'm looking at engaging E-Lumen as electrical engineer. Have you ever dealt with them by chance?

Cheers,

Paul A. Federico, MBA | President | 20 Rivermede Rd, Suite 204, Concord, ON L4K 3N3
905.669.8399 (office)
289.597.8377 (fax)
416.910.1446 (mobile)



From: Nanette Dupuis <n.dupuis@wasagadist.ca>
Sent: Thursday, August 21, 2025 10:50 AM
To: Paul Federico <pfederico@sterlinggroupcorp.com>
Subject: RE: 400 45th Street South - Wasaga Distribution Service Area Amendment Application

Thanks again, Paul!

I really appreciate your help - you're always such a pleasure to work with.

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.
P: (705) 429-2517 | n.dupuis@wasagadist.ca

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From: [Nanette Dupuis](#)
To: [Andrew Dixon](#); [Daniel Stummer](#)
Cc: [Ian MacPherson](#); [Brandon Weiss](#); [Roy Rogers](#); [Jordan Goss](#)
Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach
Date: July 3, 2025 10:38:02 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hi Andrew,

Thanks again for sending over the contact information for Primont — really appreciate it.

As we finalize our Service Area Amendment application to the OEB, we're doing our best to present a clear and transparent comparison between WDI and Hydro One. We've tried to re-engage Hydro One a few times since March but haven't had any luck — and we haven't received the breakdown of their civil cost estimates that you mentioned.

I realize those costs would ultimately be paid by the developer, but for the purposes of our application — and to make sure we're comparing apples to apples — would you be able to share the unit rate assumptions used in that estimate? Our design is a bit different, so having those details would help us line things up more accurately on our end.

Of course, totally understand if there are any restrictions on what you're able to share — just let me know what works.

Thanks again,

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.
P: (705) 429-2517 | n.dupuis@wasagadist.ca

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From: Andrew Dixon <adixon@tathameng.com>
Sent: Thursday, July 3, 2025 9:51 AM
To: Daniel Stummer <daniel@primont.com>; Nanette Dupuis <n.dupuis@wasagadist.ca>
Cc: Ian MacPherson <ian@primont.com>
Subject: FW: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

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Hi Daniel,

From: [Nanette Dupuis](#)
To: [Paul Federico](#)
Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach
Date: July 8, 2025 1:50:00 PM
Attachments: [image001.png](#)

Thank you, Paul.

I'm glad to hear we still have your support — it's truly appreciated.

I've been hearing some things informally that suggest the process we were asked to follow by Hydro One may not be unfolding as expected. I wanted to flag this in case anything you've heard has caused concern or given a different impression of our role in all of this.

Thanks again, and please don't hesitate to reach out if you'd like to discuss anything further. I'll also be sure to let you know if anything comes up on our end that we need from your side.

Kind regards,

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | n.dupuis@wasagadist.ca

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From: Paul Federico <pfederico@sterlinggroupcorp.com>
Sent: Tuesday, July 8, 2025 12:15 PM
To: Nanette Dupuis <n.dupuis@wasagadist.ca>
Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

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From: [Nanette Dupuis](#)
To: [Daniel Stummer](#)
Cc: [Brandon Weiss](#); [Roy Rogers](#); [Jordan Goss](#); [Tyler Ross](#); [Michael Mehagan](#); [Tim Edmondson](#); [Ian MacPherson](#)
Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach
Date: July 10, 2025 9:34:00 AM

Good morning, Daniel.

Thank you for the information—it's greatly appreciated.

I wanted to bring you up to speed on our end regarding our Offer to Connect (OTC).

At this time, we have not issued an OTC because the lot fabric is still subject to change pending finalization of the Plan of Subdivision. Additionally, completing the electrical distribution design requires coordination with your civil, architectural, and landscape consultants to avoid conflicts prior to construction and to ensure proper alignment with joint trench utilities.

That said, we've prepared a preliminary cost estimate based on the initial servicing information and general layout provided by Tathem, and we'd appreciate the opportunity to review it with you.

We continue to believe that WDI offers a highly competitive and flexible approach that can support your project goals effectively:

- **Flexible phasing** – We can issue separate OTCs and administer associated deposits on a per-phase basis. This allows for planning flexibility and supports more manageable cash flow as the project advances.
- **Support** – There is strong community interest in seeing this development move forward with WDI. We also understand that Paul Federico has expressed his support for WDI and for ensuring timely progress on this project.

We'd welcome the opportunity to meet and discuss project timelines, how we can best meet your needs, and ensure the most efficient and cost-effective outcome. Please let us know your availability for a meeting in the coming days.

Kind regards,

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | n.dupuis@wasagadist.ca

From: [Nanette Dupuis](#)
To: "Tyler Ross"
Cc: [Daniel Stummer](#); [Michael Mehagan](#); [Roy Rogers](#)
Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach
Date: September 17, 2025 10:30:07 AM
Attachments: [image001.png](#)

Good morning, Tyler.

It's great to hear that Primont has aligned with Sterling in supporting WDI's application to the Ontario Energy Board (OEB) for a Service Area Amendment.

I'd like to confirm that we submitted the application to the OEB on August 20th. Following the submission, we received a letter on September 4th assigning a case number and an OEB staff member to the file. However, this letter was rescinded on September 8th, and we have not received any further communication since.

We will be following up with the OEB shortly to request an update and will keep you informed of any developments as they arise.

Please feel free to reach out if you have any questions in the meantime.

Kind regards,

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | n.dupuis@wasagadist.ca

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From: Tyler Ross <TRoss@dsel.ca>
Sent: Tuesday, September 16, 2025 3:58 PM
To: Nanette Dupuis <n.dupuis@wasagadist.ca>
Cc: Daniel Stummer <daniel@primont.com>; Michael Mehagan <mmehagan@oues.ca>
Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

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Good Afternoon Nanette,

Daniel Stummer and Primont have reviewed both HONI and WDI servicing options for their Wasaga Beach Development and would like to support WDI formally. Please let us know how we can assist WDI in working through the Service Area Amendment with the OEB.

Thank you,

Tyler Ross, P.Eng

DSEL
david schaeffer engineering ltd.

600 Alden Road, Suite 606
Markham, ON L3R 0E7

phone: (905) 475-3080

cell: (807) 355-0030

email: tross@DSEL.ca

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From: Nanette Dupuis <n.dupuis@wasagadist.ca>

Sent: August 14, 2025 1:02 PM

To: Daniel Stummer <daniel@primont.com>

Cc: Tyler Ross <tross@oues.ca>

Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Good afternoon, Daniel.

I wanted to follow up to see if you had a chance to connect with Tyler last week - he mentioned you had a meeting scheduled. We're in the final stages of preparing our OEB service area amendment application, and it would be helpful to understand Primont's position.

For your awareness, we have already confirmed Sterling's support.

Kind regards,

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | n.dupuis@wasagadist.ca

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From: Tyler Ross <tross@oues.ca>

Sent: Tuesday, July 15, 2025 3:57 PM

To: Nanette Dupuis <n.dupuis@wasagadist.ca>

Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

EXTERNAL SENDER: This email came from someone outside of the organization. Do not click the links or open any attachments unless you recognize the sender and know that the content is safe.

Good Afternoon Nanette,

Thank you for sending the map over!

I sent a lengthy email to Primont on Friday, highlighting the differences between WDI and HONI. It reads favourably for WDI, for sure. I will give Daniel a call tomorrow afternoon to see where he is at. Hopefully, he will have read it by then.

It does seem odd that HONI has this obvious cutout right in your territory. Oversight by the OEB, in my opinion, was that they did not have a provision in there to have it sent back to WDI if it were to get developed.

Thank you,



Tyler Ross, P.Eng.

Managing Partner

tross@oues.ca

(807) 355-0030

www.oues.ca

From: Nanette Dupuis <n.dupuis@wasagadist.ca>
Sent: July 15, 2025 2:37 PM
To: Tyler Ross <tross@oues.ca>
Cc: Brandon Weiss <b.weiss@wasagadist.ca>; Jordan Goss <j.goss@wasagadist.ca>; Michael Mehagan <mmehagan@oues.ca>; Daniel Stummer <daniel@primont.com>; Ian MacPherson <ian@primont.com>
Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

Good afternoon, Tyler.

Just wanted to reach out to let you know we're more than happy to support your review in any way we can. If there's anything you need from us—whether it's technical details, clarification, or help with timelines—please don't hesitate to reach out. We're happy to assist.

Further to what Jordan sent earlier, I've attached a rough sketch showing the municipal and LDC boundaries, which I hope is helpful.

In the sketch:

- Orange lines represent our feeders (600 Amp connection)
- Green lines are our distribution lines (200 Amp connection)
- The purple line is Hydro One's feeder (we're assuming a 200 Amp connection, though that hasn't been confirmed)
- Other lines are noted in the legend

We're committed to being responsive and flexible so you have everything you need to complete a thorough and objective evaluation—and to help ensure the developer's needs are met.

Looking forward to hearing from you.

Best regards,

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | n.dupuis@wasagadist.ca

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From: Jordan Goss <j.goss@wasagadist.ca>
Sent: Thursday, July 10, 2025 1:29 PM
To: Tyler Ross <tross@oues.ca>; Nanette Dupuis <n.dupuis@wasagadist.ca>
Cc: Brandon Weiss <b.weiss@wasagadist.ca>; Roy Rogers <r.rogers@wasagadist.ca>; Michael Mehagan <mmehagan@oues.ca>
Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

Good afternoon Tyler,

Please find attached our preliminary CAD file. All proposed equipment locations are subject to confirmation based on the final civil and architectural plans. Let me know if you have any issues opening the file.

Our underground distribution cable is 2/0 AWG aluminum, and we have 556 aluminum overhead conductors running along Morgan Road toward Wedgewood Drive. All other cable sizes are indicated on the drawing, including those in the surrounding areas. We haven't shown any open points at this stage, but we normally would place them at PMH units or junction boxes.

Feel free to reach out if you have any questions or need other information.

Regards,

Jordan Goss, C.E.T.

Engineering Technologist | Wasaga Distribution Inc. | Wasaga Resource Services Inc.
P: (705) 429-2517 | j.goss@wasagadist.ca

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From: Tyler Ross <tross@oues.ca>
Sent: July 10, 2025 10:36 AM
To: Nanette Dupuis <n.dupuis@wasagadist.ca>
Cc: Brandon Weiss <b.weiss@wasagadist.ca>; Roy Rogers <r.rogers@wasagadist.ca>; Jordan Goss <j.goss@wasagadist.ca>; Michael Mehagan <mmehagan@oues.ca>
Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

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Good Morning Nanette,

I hope all is well and you are enjoying the summer!

I removed Primont and Tim from the thread.

We are just jumping into the site as well, and I was hoping you would be able to provide some insight on a few items so Michael and I can get a baseline understanding of how the site can be serviced:

- Can you confirm that the site would be serviced from 4.8kV?
- What is WDI's primary distribution philosophy for a site of this size with switchgears involved? Does WDI like the 200A loops to terminate in gears, or is there flexibility to terminate the 200A on poles or gears?
- Assuming it is 4.8kV and 50kVA, does WDI put 18 transformers per phase?
- Can you provide the adjacent subdivision drawings so we can get familiar with the area?

I am available all day and all morning tomorrow if you would like to have a quick call. I also live in the area and can meet you at the office if that would be beneficial.

Thank you,



Tyler Ross, P.Eng.

Managing Partner

tross@oues.ca

(807) 355-0030

www.oues.ca

From: Nanette Dupuis <n.dupuis@wasagadist.ca>

Sent: July 10, 2025 9:35 AM

To: Daniel Stummer <daniel@primont.com>

Cc: Brandon Weiss <b.weiss@wasagadist.ca>; Roy Rogers <r.rogers@wasagadist.ca>; Jordan Goss <j.goss@wasagadist.ca>; Tyler Ross <tross@oues.ca>; Michael Mehagan <mmehagan@oues.ca>;

Tim Edmondson <TEdmondson@dsel.ca>; Ian MacPherson <ian@primont.com>

Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

Good morning, Daniel.

Thank you for the information—it's greatly appreciated.

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That said, we've prepared a preliminary cost estimate based on the initial servicing information and general layout provided by Tathem, and we'd appreciate the opportunity to review it with you.

We continue to believe that WDI offers a highly competitive and flexible approach that can support your project goals effectively:

- **Flexible phasing** – We can issue separate OTCs and administer associated deposits on a per-phase basis. This allows for planning flexibility and supports more manageable cash flow as the project advances.
- **Support** – There is strong community interest in seeing this development move forward with WDI. We also understand that Paul Federico has expressed his support for WDI and for ensuring timely progress on this project.

We'd welcome the opportunity to meet and discuss project timelines, how we can best meet your needs, and ensure the most efficient and cost-effective outcome. Please let us know your availability for a meeting in the coming days.

Kind regards,

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | n.dupuis@wasagadist.ca

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From: Daniel Stummer <daniel@primont.com>
Sent: Wednesday, July 9, 2025 12:31 PM
To: Nanette Dupuis <n.dupuis@wasagadist.ca>
Cc: Brandon Weiss <b.weiss@wasagadist.ca>; Roy Rogers <r.rogers@wasagadist.ca>; Jordan Goss <j.goss@wasagadist.ca>; Tyler Ross <tross@oues.ca>; Michael Mehagan <mmehagan@oues.ca>; Tim Edmondson <TEdmondson@dsel.ca>; Ian MacPherson <ian@primont.com>
Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

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Hi Nanette,

I wanted to provide a quick update on the project.

I've taken over as the Project Manager for this proposed development and will be your main point of contact moving forward. In addition, DSEL has now taken over from Tatham as the Electrical Engineer for the project.

The main contacts at DSEL will be Tyler Ross and Tim Edmondson (cc'd here). Please include them in any future correspondence related to electrical engineering matters - Tyler will follow up with any questions he has on this matter.

Looking forward to working with you. Please don't hesitate to reach out if you have any questions.

Much appreciated,

DANIEL STUMMER Development Manager
T [905 770 7002](tel:9057707002) x 846 **C** 416 219 7447 **E** daniel@primont.com
9130 Leslie St. Suite 301, Richmond Hill, ON L4B 0B9
primont.com

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From: Nanette Dupuis <n.dupuis@wasagadist.ca>

Sent: July 3, 2025 9:43 AM

To: Andrew Dixon <adixon@tathameng.com>; Paul Federico <pfederico@sterlinggroupcorp.com>

Cc: Brandon Weiss <b.weiss@wasagadist.ca>; Roy Rogers <r.rogers@wasagadist.ca>; Jordan Goss <j.goss@wasagadist.ca>

Subject: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

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Good morning, Paul and Andrew,

I hope you're enjoying the summer so far. I just wanted to give you a quick heads-up that I'll be sending over a formal letter shortly regarding the electrical servicing for 400 45th Street South.

As you know, we've been in ongoing discussions with Hydro One for some time now, trying to work through a fair and transparent process to determine which distributor will service the property. Unfortunately, we've encountered several challenges — including delays, inconsistent cost scopes, and a lack of clarity around civil and inspection costs on their end.

Here's a quick preview of where things stand:

- Our total estimate was \$3.69M, including inspection and \$1.52M for civil work.
- Hydro One's \$2.4M estimate excluded both civil and inspection costs. They later indicated that inspection costs alone would be approximately \$90,000.
- Once those costs are factored in, their effective cost is actually higher — and based on our understanding, their design is less robust and not as well prepared for future needs.

We've made several attempts to re-engage Hydro One since March but haven't made any progress. As a result, we're planning to move forward with a Service Area Amendment application to the OEB without their consent.

The formal letter will outline these details and ask for confirmation on a few items — including that WDI remains the preferred distributor and that we have the correct contact information for both property owner and developer.

For context: 400 45th Street South is located within the Town of Wasaga Beach and has historically been part of our service territory, as established when our utility was formed. At the time, the property was a farm and temporarily served by Hydro One from 45th Street, which created a long-term load transfer — Hydro One provided the service, but we reconciled the load annually.

In 2016, the OEB mandated that all long-term load transfers be eliminated, with customers assigned to the utility physically supplying them. Now that the farm service has been removed and the development will be fed from our infrastructure on Morgan Road (we're we have infrastructure), we're looking to reintroduce the property into our designated service territory — as originally intended.

Additionally, we're working with a new supplier and may be able to reduce our costs further. Once confirmed, we'll be ready to present an Offer to Connect should you wish to proceed.

If you have any questions or would like to connect before the letter goes out, feel free to reach out anytime.

Best regards,

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | n.dupuis@wasagadist.ca

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Subject: RE: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

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Looking forward to working with you. Please don't hesitate to reach out if you have any questions.

Much appreciated,

DANIEL STUMMER Development Manager
T 905 770 7002 x 846 C 416 219 7447 E daniel@primont.com
9130 Leslie St. Suite 301, Richmond Hill, ON L4B 0B9
primont.com

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From: Nanette Dupuis <n.dupuis@wasagadist.ca>
Sent: July 3, 2025 9:43 AM
To: Andrew Dixon <adixon@tathameng.com>; Paul Federico <pfederico@sterlinggroupcorp.com>
Cc: Brandon Weiss <b.weiss@wasagadist.ca>; Roy Rogers <r.rogers@wasagadist.ca>; Jordan Goss <j.goss@wasagadist.ca>
Subject: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

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Good morning, Paul and Andrew,

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The formal letter will outline these details and ask for confirmation on a few items — including that WDI remains the preferred distributor and that we have the correct contact information for both property owner and developer.

For context: 400 45th Street South is located within the Town of Wasaga Beach and has historically been part of our service territory, as established when our utility was formed. At the time, the property was a farm and temporarily served by Hydro One from 45th Street, which created a long-term load transfer — Hydro One provided the service, but we reconciled the load annually.

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Additionally, we're working with a new supplier and may be able to reduce our costs further. Once confirmed, we'll be ready to present an Offer to Connect should you wish to proceed.

If you have any questions or would like to connect before the letter goes out, feel free to reach out anytime.

Best regards,

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | n.dupuis@wasagadist.ca

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Good morning, Nanette.

I hope you're doing well! I wanted to confirm that I'm still involved with the project as a silent partner. Regarding the letter of support, it is still valid and reflects my current position. Please feel free to include it in your Service Area Amendment application to the OEB.

Thanks for keeping me in the loop, and let me know if there's anything else you need from me.

Best regards,

Paul A. Federico, MBA | President | 20 Rivermede Rd, Suite 204, Concord, ON L4K 3N3
905.669.8399 (office)
289.597.8377 (fax)
416.910.1446 (mobile)



From: Nanette Dupuis <n.dupuis@wasagadist.ca>
Sent: Monday, July 7, 2025 8:53 AM
To: Paul Federico <pfederico@sterlinggroupcorp.com>
Subject: FW: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

Good morning, Paul.

Hope you had a great weekend!

I just wanted to follow up on the note below. Andrew Dixon let us know that Primont Homes is the developer for 400 45th Street South — just checking if you're no longer involved with the project?

We've been trying to work with Hydro One on a fair and transparent process, but unfortunately, things haven't progressed. Given the lack of clarity and collaboration, we're now preparing a Service Area Amendment application to the OEB.

You had kindly signed a letter of support confirming WDI as the distributor of choice for the development — thanks again for that. I've attached a copy here for reference. Just hoping to confirm that it's still valid and reflects your current position so we can include it in our application.

Really appreciate your help — let me know if you have any questions or if there's anything you'd like to discuss.

Best regards,

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | n.dupuis@wasagadist.ca

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Cc: Brandon Weiss <b.weiss@wasagadist.ca>; Roy Rogers <r.rogers@wasagadist.ca>; Jordan Goss <j.goss@wasagadist.ca>

Subject: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

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Best regards,

Nanette Dupuis, C.E.T., C.I.M.

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See below update from Nanette.

Nanette,

For your information:

1. Daniel is the updated contact person for this project on the developer side.

DANIEL STUMMER Development Manager

T 905 770 7002 x 846 **C** 416 219 7447 **E** daniel@primont.com

9130 Leslie St. Suite 301, Richmond Hill, ON L4B 0B9

2. We did provide a civil works costs estimate to HONI in April based on the CAD for their design, the idea being that the developer would be responsible for those costs directly, but for comparison with WDI they should be included in the total costs. I'm not sure if I'm allowed to share that with you or even just the total estimated fee.

Thanks

Andrew

Andrew Dixon P.Eng.
Senior Engineer, Group Leader

adixon@tathameng.com **T** 705-444-2565 x2198 **C** 705-627-7466
115 Sandford Fleming Drive, Suite 200, Collingwood, Ontario L9Y 5A6

tathameng.com [in](#) [@](#) [f](#)

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From: Nanette Dupuis <n.dupuis@wasagadist.ca>

Sent: Thursday, July 3, 2025 9:43 AM

To: Andrew Dixon <adixon@tathameng.com>; Paul Federico <pfederico@sterlinggroupcorp.com>

Cc: Brandon Weiss <b.weiss@wasagadist.ca>; Roy Rogers <r.rogers@wasagadist.ca>; Jordan Goss <j.goss@wasagadist.ca>

Subject: Electrical Servicing Update – 400 45th Street South, Wasaga Beach

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Good morning, Paul and Andrew,

I hope you're enjoying the summer so far. I just wanted to give you a quick heads-up that I'll be sending over a formal letter shortly regarding the electrical servicing for 400 45th Street South.

As you know, we've been in ongoing discussions with Hydro One for some time now, trying to work through a fair and transparent process to determine which distributor will service the property. Unfortunately, we've encountered several challenges — including delays, inconsistent cost scopes, and a lack of clarity around civil and inspection costs on their end.

Here's a quick preview of where things stand:

- Our total estimate was \$3.69M, including inspection and \$1.52M for civil work.
- Hydro One's \$2.4M estimate excluded both civil and inspection costs. They later indicated that inspection costs alone would be approximately \$90,000.
- Once those costs are factored in, their effective cost is actually higher — and based on our understanding, their design is less robust and not as well prepared for future needs.

We've made several attempts to re-engage Hydro One since March but haven't made any progress. As a result, we're planning to move forward with a Service Area Amendment application to the OEB without their consent.

The formal letter will outline these details and ask for confirmation on a few items — including that WDI remains the preferred distributor and that we have the correct contact information for both property owner and developer.

For context: 400 45th Street South is located within the Town of Wasaga Beach and has historically been part of our service territory, as established when our utility was formed. At the time, the property was a farm and temporarily served by Hydro One from 45th Street, which created a long-term load transfer — Hydro One provided the service, but we reconciled the load annually.

In 2016, the OEB mandated that all long-term load transfers be eliminated, with customers assigned to the utility physically supplying them. Now that the farm service has been removed and the development will be fed from our infrastructure on Morgan Road (we're we have infrastructure), we're looking to reintroduce the property into our designated service territory — as originally intended.

Additionally, we're working with a new supplier and may be able to reduce our costs further. Once confirmed, we'll be ready to present an Offer to Connect should you wish to proceed.

If you have any questions or would like to connect before the letter goes out, feel free to reach out anytime.

Best regards,

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | n.dupuis@wasagadist.ca

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If you have received this message in error please notify the sender immediately and delete this email message from your computer.

From: Paul Federico <pfederico@sterlinggroupcorp.com>
Sent: Thursday, August 21, 2025 7:11 AM
To: Nanette Dupuis <n.dupuis@wasagadist.ca>
Subject: Re: 400 45th Street South - Wasaga Distribution Service Area Amendment Application

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Good morning, Nanette.

That's correct in terms of project team. I will reach out to Ian to ensure he's receiving your emails. Leave it with me.

Happy Thursday!

Paul

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From: Nanette Dupuis <n.dupuis@wasagadist.ca>
Sent: Wednesday, August 20, 2025 4:03:59 p.m.
To: Paul Federico <pfederico@sterlinggroupcorp.com>
Subject: RE: 400 45th Street South - Wasaga Distribution Service Area Amendment Application

Hi, Paul.

Thanks so much for getting back to me - I really appreciate your willingness to help! I just wanted to mention that while I truly value your responsiveness and support, I haven't received any feedback or updates from Primont regarding recent communications.

Would you mind confirming if I have the right contacts for them?

Daniel Stummer <daniel@primont.com>

Ian MacPherson <ian@primont.com>

Thanks again!

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | n.dupuis@wasagadist.ca

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From: Paul Federico <pfederico@sterlinggroupcorp.com>

Sent: Wednesday, August 20, 2025 3:19 PM

To: Nanette Dupuis <n.dupuis@wasagadist.ca>

Subject: RE: 400 45th Street South - Wasaga Distribution Service Area Amendment Application

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Good afternoon Nanette,

Thank you for the update. I appreciate you sending the application documents for reference.

Please reach out if you need anything from my end.

Thanks again for keeping me informed.

Regards,

Paul A. Federico, MBA | President | 20 Rivermede Rd, Suite 204, Concord, ON L4K 3N3

905.669.8399 (office)

289.597.8377 (fax)

416.910.1446 (mobile)



From: Nanette Dupuis <n.dupuis@wasagadist.ca>
Sent: Wednesday, August 20, 2025 2:54 PM
To: Paul Federico <pfederico@sterlinggroupcorp.com>; Daniel Stummer <daniel@primont.com>
Cc: Ian MacPherson <ian@primont.com>
Subject: 400 45th Street South - Wasaga Distribution Service Area Amendment Application

Good afternoon,

I wanted to let you know that we've submitted the Service Area Amendment application to the Ontario Energy Board. The OEB has assigned file number EB-2025-0254 to this matter.

I've attached the application documents for your reference. The OEB will provide us with the name and contact information of the staff member assigned to this file at a later date, and we'll be sure to keep you posted on any developments as they arise.

Please don't hesitate to reach out if you have any questions in the meantime.

Kind regards,

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | n.dupuis@wasagadist.ca

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APPENDIX G
Debt to Equity Comparison

Current Company Name	Year	Net Property, Plant and Equipment Total	Total Debt	Working Capital Allowance	Rate Base (Simple/Non-Average)	Deemed Equity %	Deemed Debt %
Algoma Power Inc.	2024	148,000,646	107,000,000	3,408,064	151,408,710	29%	71%
Ellexicon Energy Inc.	2024	552,571,155	384,394,459	37,716,305	590,287,460	35%	65%
Hydro Ottawa Limited	2024	1,378,193,869	937,078,772	77,853,723	1,456,047,592	36%	64%
PUC Distribution Inc.	2024	143,029,029	93,554,017	6,660,844	149,689,873	38%	62%
EPCOR Electricity Distribution Ontario Inc.	2024	35,354,788	23,306,721	3,510,640	38,865,428	40%	60%
Halton Hills Hydro Inc.	2024	108,846,768	67,256,949	5,696,698	114,543,466	41%	59%
Lakeland Power Distribution Ltd.	2024	33,537,870	21,186,387	3,467,804	37,005,674	43%	57%
Greater Sudbury Hydro Inc.	2024	112,497,949	69,925,021	9,669,072	122,167,021	43%	57%
North Bay Hydro Distribution Limited	2024	94,355,492	56,664,712	5,736,380	100,091,872	43%	57%
Lakefront Utilities Inc.	2024	27,651,569	16,986,837	2,505,191	30,156,760	44%	56%
Hydro One Networks Inc.	2024	11,246,248,049	6,470,731,943	349,762,334	11,596,010,383	44%	56%
Oshawa PUC Networks Inc.	2024	180,449,081	106,700,000	11,912,475	192,361,557	45%	55%
Orangeville Hydro Limited	2024	24,664,848	15,101,423	2,726,939	27,391,787	45%	55%
London Hydro Inc.	2024	425,727,783	250,582,324	35,663,261	461,391,043	46%	54%
Kingston Hydro Corporation	2024	61,894,953	37,009,196	6,887,356	68,782,310	46%	54%
Northern Ontario Wires Inc.	2024	10,292,144	6,185,837	1,330,178	11,622,322	47%	53%
Newmarket-Tay Power Distribution Ltd.	2024	125,526,578	71,619,975	9,093,938	134,620,516	47%	53%
Niagara Peninsula Energy Inc.	2024	175,917,614	100,600,000	14,121,258	190,038,872	47%	53%
ERTH Power Corporation	2024	74,730,247	42,275,333	5,574,908	80,305,155	47%	53%
Milton Hydro Distribution Inc.	2024	112,274,095	64,107,218	10,207,135	122,481,231	48%	52%
Essex Powerlines Corporation	2024	72,659,183	40,806,616	6,131,718	78,790,901	48%	52%
Entegrus Powerlines Inc.	2024	159,979,185	88,052,180	13,531,603	173,510,788	49%	51%
Toronto Hydro-Electric System Limited	2024	6,144,802,296	3,180,124,177	243,110,215	6,387,912,512	50%	50%
Grimsby Power Incorporated	2024	30,383,313	16,262,564	2,740,692	33,124,005	51%	49%
Wellington North Power Inc.	2024	12,949,931	6,727,028	1,185,994	14,135,926	52%	48%
Synergy North Corporation	2024	167,889,081	84,262,101	10,197,825	178,086,906	53%	47%
Alectra Utilities Corporation	2024	4,514,424,946	2,244,848,780	261,877,987	4,776,302,933	53%	47%
InnPower Corporation	2024	102,264,037	47,822,400	4,017,837	106,281,873	55%	45%
Westario Power Inc.	2024	73,707,024	35,052,759	4,555,292	78,262,316	55%	45%
Welland Hydro-Electric System Corp.	2024	41,279,695	19,855,031	4,463,197	45,742,892	57%	43%
Renfrew Hydro Inc.	2024	9,035,213	4,284,481	964,282	9,999,495	57%	43%
Rideau St. Lawrence Distribution Inc.	2024	8,050,920	3,953,356	1,320,230	9,371,150	58%	42%
Tillsonburg Hydro Inc.	2024	18,373,886	8,500,000	2,003,724	20,377,610	58%	42%
Oakville Hydro Electricity Distribution Inc.	2024	227,704,782	98,461,707	17,987,084	245,691,866	60%	40%
Ottawa River Power Corporation	2024	16,415,806	7,183,091	1,954,973	18,370,779	61%	39%
Centre Wellington Hydro Ltd.	2024	19,398,424	8,213,184	1,720,280	21,118,704	61%	39%
Bluewater Power Distribution Corporation	2024	97,977,641	39,783,913	8,785,464	106,763,105	63%	37%
Burlington Hydro Inc.	2024	152,625,176	62,116,729	16,960,990	169,586,166	63%	37%
GrandBridge Energy Inc.	2024	383,293,828	149,223,416	27,238,729	410,532,557	64%	36%
Wasaga Distribution Inc.	2024	23,840,664	9,290,799	1,907,951	25,748,615	64%	36%
Canadian Niagara Power Inc.	2024	163,596,347	61,050,000	5,655,230	169,251,577	64%	36%
Hydro Hawkesbury Inc.	2024	6,663,828	2,862,871	1,396,675	8,060,504	64%	36%
Niagara-on-the-Lake Hydro Inc.	2024	35,152,216	13,380,608	2,618,298	37,770,515	65%	35%
Enova Power Corp.	2024	684,548,457	246,192,575	33,832,426	718,380,883	66%	34%
Sioux Lookout Hydro Inc.	2024	5,551,942	2,145,446	891,670	6,443,612	67%	33%
ENWIN Utilities Ltd.	2024	251,068,871	79,747,627	21,128,424	272,197,294	71%	29%
Festival Hydro Inc.	2024	65,214,073	18,793,047	5,702,760	70,916,832	73%	27%
Hearst Power Distribution Company Limited	2024	2,248,667	786,913	738,940	2,987,607	74%	26%
E.L.K. Energy Inc.	2024	16,347,729	4,105,029	2,835,303	19,183,032	79%	21%
Hydro 2000 Inc.	2024	1,014,882	250,000	250,341	1,265,223	80%	20%
Atikokan Hydro Inc.	2024	3,344,903	22,777	363,869	3,708,771	99%	1%
Cooperative Hydro Embrun Inc.	2024	4,461,049	-	411,036	4,872,086	100%	0%
Fort Frances Power Corporation	2024	5,317,651	-	834,930	6,152,582	100%	0%

Disclaimer:

The deemed debt-to-equity calculations presented are derived from the 2024 OEB Yearbook. These calculations are intended solely for illustrative purposes to provide a general comparison of financial strength across distributors. The debt-to-equity ratios shown are not independently verified and may not reflect each company's actual capital structure or accounting treatment. Variations in reporting methods, year-end adjustments, and regulatory filings may affect comparability. Accordingly, this information should not be relied upon for decision-making and should be interpreted as an approximate indicator rather than a precise financial measure.

APPENDIX H
WDI Engagement with HONI

From: [Nanette Dupuis](#)
To: [Bahareh Tehrani](#); [James McGowan](#)
Cc: [Corey Hastings](#); [Musaab Choudhry](#); [Lei Zhu](#); [BARRIE DX ASSET Management](#)
Subject: RE: OEB Load Capacity Maps - Hydro One Capacity Data - Wasaga
Date: July 31, 2025 10:45:47 AM
Attachments: [image001.png](#)
[image002.png](#)

Thanks so much, everyone, for answering my questions—I really appreciate all your help!

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | n.dupuis@wasagadist.ca

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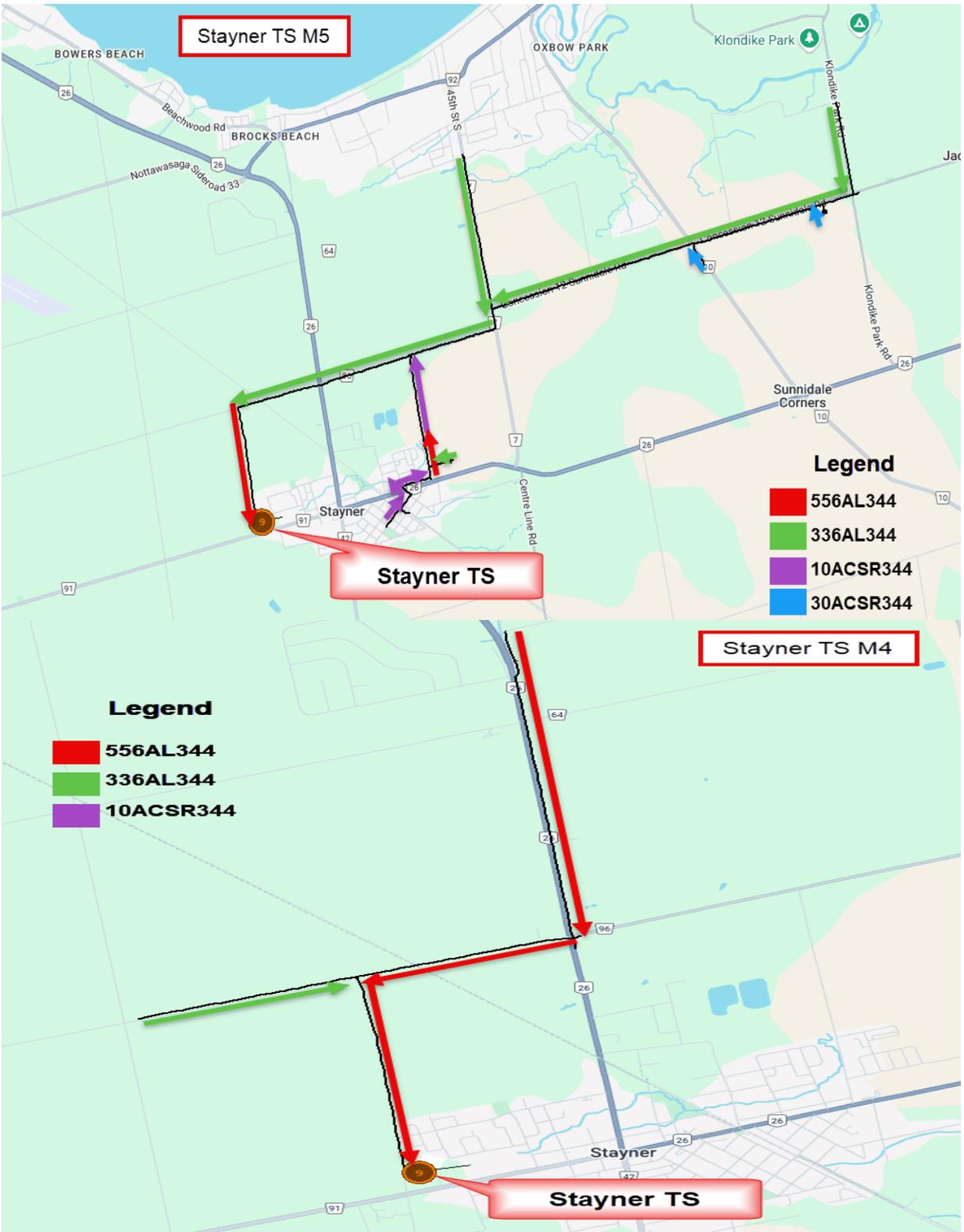
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From: Bahareh Tehrani <Bahareh.Tehrani@HydroOne.com>
Sent: Wednesday, July 30, 2025 12:52 PM
To: James McGowan <James.McGowan@HydroOne.com>; Nanette Dupuis <n.dupuis@wasagadist.ca>
Cc: Corey Hastings <Corey.Hastings@HydroOne.com>; Musaab Choudhry <Musaab.Choudhry@HydroOne.com>; Lei Zhu <Lei.Zhu@HydroOne.com>; BARRIE DX ASSET Management <Management.BarrieDxAsset@hydroone.com>
Subject: Re: OEB Load Capacity Maps - Hydro One Capacity Data - Wasaga

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Hi everyone,

We checked the records and mapped below the best information we have available for the conductor size along the path of Stayner M4 and M5



Bahareh

From: James McGowan <James.McGowan@HydroOne.com>

Sent: Tuesday, July 29, 2025 7:46 PM

To: Bahareh Tehrani <Bahareh.Tehrani@HydroOne.com>; Nanette Dupuis <n.dupuis@wasagadist.ca>
Cc: Corey Hastings <Corey.Hastings@HydroOne.com>; Musaab Choudhry <Musaab.Choudhry@HydroOne.com>; Lei Zhu <Lei.Zhu@HydroOne.com>; BARRIE DX ASSET Management <Management.BarrieDxAsset@hydroone.com>
Subject: Re: OEB Load Capacity Maps - Hydro One Capacity Data - Wasaga

Thank you Bahareh.

Hi Nanette, please see the response below from our DX Asset Planning group.

If you have any further questions regarding the capacity maps, Bahareh Tehrani or the Barrie DX Asset Management Inbox (cc's) should be able to assist further.

Thanks for reaching out. Take care,

JAMIE MCGOWAN

Operations Specialist - Eastern Ontario

Hydro One Networks Inc.

Customer Operating Support

705-818-3413

From: Bahareh Tehrani <Bahareh.Tehrani@HydroOne.com>
Sent: Tuesday, July 29, 2025 5:36 PM
To: James McGowan <James.McGowan@HydroOne.com>
Cc: Corey Hastings <Corey.Hastings@HydroOne.com>; Musaab Choudhry <Musaab.Choudhry@HydroOne.com>; Lei Zhu <Lei.Zhu@HydroOne.com>; BARRIE DX ASSET Management <Management.BarrieDxAsset@hydroone.com>
Subject: Fw: OEB Load Capacity Maps - Hydro One Capacity Data - Wasaga

Hi James,

Please see my notes below in Blue for questions 2 to 6, I also added one additional clarification to the question 4.

For question 1, GIS does not show the conductor information for these feeders. So we would need more time to dig for that information from other systems.

1. Could you confirm the conductor type and size for feeders 234M4 and 234M5?
2. What is HONI's peak planning limit for these feeders? For 44kV feeders, 400A (about 30MVA)
3. The data for 234M5 shows 13,107 kVA of available capacity—can you confirm whether this total is shared between WDI and HONI? Yes, the available capacity is shared between all

connected utilities and will be assigned on a first need/first served basis.

4. Please confirm that 234M4 is dedicated to WDI. **JM: That is correct. We own about 5.5km from Stayner TS to your demarcation point, but there are no other Hydro One customers connected to the M4.**

Please note if Hydro One receives a customer connection request in that first 5.5km, Hydro One would be obligated to provide that customer with an offer to connect to M4 as long as there is capacity available on the feeder or station.

5. It appears the values reflect total available capacity at the Distribution Station, Feeder, etc. Could you clarify what WDI's Total Normal Supply Capacity, Assigned Capacity, and Available Capacity are? The assigned capacity will be equal to the highest rolling three-month average peak load of each utility, except for cases that a CCRA or expansion deposit is in place. The available capacity will be the remaining capacity on the feeder/station after the load of all connected LDCs is considered.
6. Are some of these capacity figures overlapping? For example, Brock's Beach (on 234M8) is listed with 3,583 kVA available, while 234M8 is listed with 7,087 kVA—does the Brock's Beach amount form part of the 234M8 total? Is half of 234M8's capacity available at Brock's Beach? That is correct, for example if a number of small connections equivalent to 3kVA gets connected to Brock Beach DS, then remaining capacity at Brock Beach will be 0.58kVA and available capacity at M8 will be reduced to about 4kVA.

From: Nanette Dupuis <n.dupuis@wasagadist.ca>

Sent: Monday, July 28, 2025 11:08 AM

To: James McGowan <James.McGowan@HydroOne.com>; Lei Zhu <Lei.Zhu@HydroOne.com>; Bahareh Tehrani <Bahareh.Tehrani@HydroOne.com>

Cc: r.rogers <r.rogers@wasagadist.ca>; Corey Hastings <Corey.Hastings@HydroOne.com>; Musaab Choudhry <Musaab.Choudhry@HydroOne.com>

Subject: RE: OEB Load Capacity Maps - Hydro One Capacity Data - July 24th 2025

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Thank you, Jamie, for your helpful responses and for pointing me in the right direction with the questions you couldn't answer. I appreciate your cooperation!

Kind regards,

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | n.dupuis@wasagadist.ca

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From: James McGowan <James.McGowan@HydroOne.com>
Sent: Monday, July 28, 2025 10:02 AM
To: Nanette Dupuis <n.dupuis@wasagadist.ca>; Lei Zhu <Lei.Zhu@HydroOne.com>; Bahareh Tehrani <Bahareh.Tehrani@HydroOne.com>
Cc: Roy Rogers <r.rogers@wasagadist.ca>; Corey Hastings <Corey.Hastings@HydroOne.com>; Musaab Choudhry <Musaab.Choudhry@HydroOne.com>
Subject: Re: OEB Load Capacity Maps - Hydro One Capacity Data - July 24th 2025

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Hi Nanette,

Please see below some **answers** to your questions. For the others, I will kindly pass this over to our Asset Management team to provide responses ([@Bahareh Tehrani](#) [@Lei Zhu](#)).

Thanks,

JAMIE MCGOWAN

Operations Specialist - Eastern Ontario

Hydro One Networks Inc.

Customer Operating Support

705-818-3413

From: Nanette Dupuis <n.dupuis@wasagadist.ca>

Sent: Friday, July 25, 2025 2:28 PM

To: James McGowan <James.McGowan@HydroOne.com>

Cc: r.rogers <r.rogers@wasagadist.ca>

Subject: RE: OEB Load Capacity Maps - Hydro One Capacity Data - July 24th 2025

You don't often get email from n.dupuis@wasagadist.ca. [Learn why this is important](#)

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Good afternoon, Jamie.

We appreciate your support as we work through the capacity mapping process. We've reviewed the information provided and have a few questions—some of which fall outside the scope of the capacity map project:

1. Could you confirm the conductor type and size for feeders 234M4 and 234M5?
2. What is HONI's peak planning limit for these feeders? [For 44kV feeders, 400A \(about 30MVA\)](#)
3. The data for 234M5 shows 13,107 kVA of available capacity—can you confirm whether this total is shared between WDI and HONI? [Yes, the available capacity is shared between all connected utilities and will be assigned on a first need/first served basis.](#)
4. Please confirm that 234M4 is dedicated to WDI. [JM: That is correct. We own about 5.5km from Stayner TS to your demarcation point, but there are no other Hydro One customers connected to the M4.](#)

[Please note if Hydro One receives a customer connection request in that first 5.5km, Hydro One would be obligated to provide that customer with an offer to connect to M4 as long as there is capacity available on the feeder or station.](#)

5. It appears the values reflect total available capacity at the Distribution Station, Feeder, etc. Could you clarify what WDI's Total Normal Supply Capacity, Assigned Capacity, and Available Capacity are? [The assigned capacity will be equal to the highest rolling three-month average peak load of each utility, except for cases that a CCRA or expansion deposit is in place. The available capacity will be the remaining capacity on the feeder/station after the load of all connected LDCs is considered.](#)
6. Are some of these capacity figures overlapping? For example, Brock's Beach (on 234M8) is listed with 3,583 kVA available, while 234M8 is listed with 7,087 kVA—does the Brock's Beach amount form part of the 234M8 total? Is half of 234M8's capacity available at Brock's Beach? [That is correct, for example if a number of small connections equivalent to 3kVA gets connected to Brock Beach DS, then remaining capacity at Brock Beach will be 0.58kVA and available capacity at M8 will be reduced to about 4kVA.](#)

Additionally:

I wasn't able to open the operating diagram on the SharePoint drive—would you mind checking on this? JM: This issue arose late last week. We have engaged our IT Support Dept, who are now working on a resolution. I will notify you once we have the issue fixed.

- Could we obtain SCADA point data from HONI for Brock's Beach, 234M4, and 234M5 for integration into our SCADA system? JM: I can work on trying to get you SCADA data via ICCP for M4 and M5, but unfortunately, we do not have SCADA at our Brocks Beach DS.

Thanks again for your assistance, and please let us know if a call would be helpful to go through any of this.

Best regards,

Nanette Dupuis, C.E.T., C.I.M.

Manager of Engineering | Wasaga Distribution Inc. | Wasaga Resource Services Inc.

P: (705) 429-2517 | n.dupuis@wasagadist.ca

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From: James McGowan <James.McGowan@HydroOne.com>

Sent: Thursday, July 24, 2025 3:45 PM

Cc: Lei Zhu <Lei.Zhu@HydroOne.com>; Customer Operating Support <CustomerOperatingSupport@hydroone.com>; Bahareh Tehrani <Bahareh.Tehrani@HydroOne.com>

Subject: OEB Load Capacity Maps - Hydro One Capacity Data - July 24th 2025

EXTERNAL SENDER: This email came from someone outside of the organization. Do not click the links or open any attachments unless you recognize the sender and know that the content is safe.

Hello everyone,

Please see the latest attachment of the 'Embedded LDC Load Capacity' spreadsheet which contains Hydro One's load capacity for feeders we share. This file was updated as of July 16th, 2025.

Please contact me if you have any questions.

Take care,

JAMIE MCGOWAN

Operations Specialist - Eastern Ontario

Hydro One Networks Inc.

Customer Operating Support

705-818-3413

From: MCGOWAN James
Sent: Sunday, February 23, 2025 1:10 PM
Cc: ZHU Lei <Lei.Zhu@HydroOne.com>; Customer Operating Support <CustomerOperatingSupport@hydroone.com>
Subject: OEB Load Capacity Maps - Hydro One Capacity Data

Hello everyone,

Please find the attached 'Embedded LDC Load Capacity' spreadsheet which contains Hydro One's load capacity for feeders we share. Also attached is the letter from the OEB regarding the capacity maps (Distribution System Capacity Information Map – Phase 1 Implementation).

You can filter by your companies name to find the following data and capacity ranges:

- LVDS Feeder
- LVDS Station Name
- HV Feeder
- Station Name
- LVDS Station Capacity (kW)
- LV Feeder Capacity (kW)

- HV Feeder Capacity (kW)

Please contact me if you have any questions.

Have a good day.

JAMIE MCGOWAN

Operations Specialist - Eastern Ontario

Hydro One Networks Inc.

Customer Operating Support

705-818-3413