

Hydro One Networks Inc.

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

Pasquale Catalano

Director
Major Projects and Partnerships
C 647.616.8310
Pasquale.Catalano@HydroOne.com

BY EMAIL AND RESS

November 14, 2025

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

Dear Mr. Murray,

EB-2025-0254 - Wasaga Distribution Inc. Application for a Service Area Amendment - Hydro One Notice of Motion

Pursuant to the Ontario Energy Board's Rules of Practice and Procedure, Hydro One Networks Inc. (Hydro One) is filing a motion to seek an Order of the Board for Wasaga Distribution Inc. (WDI) to provide answers and/or further and better answers to interrogatory responses served by WDI in this proceeding. Hydro One requests that the motion be heard in writing.

An electronic copy of this Notice of Motion has been submitted using the Ontario Energy Board's Regulatory Electronic Submission System.

Sincerely,



Pasquale Catalano

cc: Wasaga Distribution Inc.
EB-2025-0254 Intervenors of Record

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O.
1998, c.15, Sched. B;

AND IN THE MATTER OF an application by Wasaga Distribution
Inc. (WDI) for a service area amendment in respect of 400 45th
Street South, Town of Wasaga Beach.

**NOTICE OF MOTION
HYDRO ONE NETWORKS INC.**

November 14, 2025

NOTICE OF MOTION

Hydro One Networks Inc. (“Hydro One”) will make a motion to the Ontario Energy Board (the “OEB” or the “Board”) at its offices at 2300 Yonge Street, Toronto, in writing or as otherwise directed by the Board.

THE MOTION IS FOR AN ORDER:

1. Requiring the Applicant, WDI, to provide a complete answer to Hydro One’s Interrogatory #1 c), dated October 31, 2025, wherein Hydro One asked the Applicant to provide a copy of the communication when WDI was first made aware of the potential development of the Subject Area which WDI has responded was PRE-C1722 on August 23, 2022, but has omitted to provide a copy of the requested document.
2. Requiring the Applicant, WDI, to provide an answer to Hydro One’s Interrogatory #7 e), and f) dated October 31, 2025, wherein Hydro One asked the Applicant what the upstream costs of three investments incurred since 2022 to supply the Subject Area and whether those investments were exclusively funded by WDI ratepayers. In response to Hydro One’s Interrogatory #7, WDI relied upon its responses to OEB Staff Interrogatory #5, part 1 and 2, that asked similar questions to WDI (to provide the upstream investment costs already made to supply the subject area) which responses were not adequate and complete.
3. Requiring the Applicant, WDI, to provide an answer to Hydro One’s Interrogatory #12 b) which requested all Morgan Road infrastructure additions, relocations, or upgrades from January 1, 2015 to present (asset name, approval date of investment need decision, asset inservice date, book value cost, and stated need) and to provide the details for Reference 2, which was not received.
4. Extending the date set out by the Board in paragraphs 1 and 2 of the Decision on Supplementary Evidence and Procedural Order No. 3 dated November 10, 2025, being the date by which intervenors and OEB Staff must provide written submission regarding the Application, to a date that is 10 days after the date that the Board issues a Decision and Order regarding this Notice of Motion or to a date that is 10 days after the Applicant has complied with any Decision and Order that may be made by the

1 Board granting any portion of the relief requested in this Notice of Motion, whichever
2 date is later.

3

4 **THE GROUNDS FOR THE MOTION ARE:**

- 5 a) the relevance of the information requested in this Notice of Motion;
6 b) Hydro One is entitled to full and adequate responses to the interrogatories noted
7 above;
8 c) the need for the information in order to fairly compare the fully allocated connection
9 costs resulting from the connection to the Applicant rather than to the incumbent
10 distributor;
11 d) Rules 2.01, 2.02, 7, 8, 26 and 27 of the OEB's Rules of Practice and Procedure
12 (revised November 13, 2025); and
13 e) Such other grounds and material as counsel may advise and the OEB may permit.

14

15 **DOCUMENTARY EVIDENCE**

- 16 1. The Application of WDI dated August 19, 2025 and WDI Supplementary Evidence
17 dated October 27, 2025 (EB-2025-0254);
18 2. Hydro One Interrogatories to WDI dated October 31, 2025 (EB-2025-0254);
19 3. OEB Staff Interrogatories to WDI dated October 31, 2025 (EB-2025-0254);
20 4. WDI Interrogatory Responses dated November 7, 2025 (EB-2025-0254); and
21 5. OEB Filing Requirements for Service Area Amendment Applications (dated March 12,
22 2007) and the OEB decision (RP-2003-044—the Combined Distribution SAA
23 Proceeding) relied on therein.

1 **All of which is respectfully submitted on November 14, 2025.**

Counsel for Hydro One Networks Inc.

Monica Caceres

Assistant General Counsel

Hydro One Networks Inc.

Mailing Address: 8th Floor, South Tower

483 Bay Street

Toronto, Ontario M5G 2P5

Telephone: (647) 505-3341

Email: monica.caceres@hydroone.com