

BY EMAIL AND RESS

December 12, 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,

Re: EB-2025-0254 – Wasaga Distribution Inc. Application for a Service Area Amendment – Procedural Order No. 5 – Hydro One Reply Submission

Pursuant to Procedural Order No. 5 (PO5) dated December 10, 2025, Hydro One Networks Inc. (“Hydro One”) submits this Reply in response to WDI’s letter dated December 4, 2025 and the newly appended materials (“Appended Materials”).

Overview

Hydro One continues to rely on its Notice of Motion filed November 11, 2025 (the “Motion”) for the relief sought in paragraphs 2 to 4 and the further request for information related to WDI’s response to Interrogatory 1(c) as detailed in Hydro One’s letter dated December 2, 2025, which materials also collectively addressed Hydro One’s position on the following:

- 1) the relevance of upstream costs incurred and paid since 2022 to this SAA Application and the principles in RP-2003-0044 (Reference to Hydro One Interrogatory 7(e) and (f) and Wasaga Distribution Inc.’s (“WDI”) response), and
- 2) the relevance of asset additions, relocations or upgrades from January 1, 2015 to present, to this SAA Application, and the principles in RP-2003-0044 (Reference to Hydro One Interrogatory 12 and WDI’s response).

Hydro One withdraws the order sought at paragraph 1 of the Motion and acknowledges that WDI has addressed the relief sought through WDI letter dated November 27, 2025, with the disclosure of PRE-C1722.

WDI’s NON-RESPONSE ON THE ISSUE OF RELEVANCE

Hydro One submits that WDI’s response dated December 4th fails to meaningfully and substantively address Hydro One’s arguments on the issue of the relevance of the orders and/or information requested, and thus the relief sought by Hydro One should be granted.

Order to Respond to Hydro One Interrogatory question 12

WDI's objection to providing a chronology of all capital investments along Morgan Road dating back to 2015 on the basis that it was to 'support feeder interconnectivity between MS3 and MS6 to enhance system reliability'¹ is reasonably questionable in light of the WDI capital budget reports submitted by Hydro One in its Intervenor Evidence dated October 17, 2025² and WDI's evidence that SAIDI and SAIFI in the area in the two-year period prior to the investment being undertaken each averaged at less than 0.001.³

This unorthodox Service Area Amendment Application brought by WDI requires additional scrutiny in light of the fact that at the time of the LTLT Joint Application in 2016, the upgraded infrastructure on Morgan Road was not present as outlined in Hydro One's Intervenor Evidence, section 2.1.2.3, and Attachment 1—Subject Area Photo Evidence. Moreover, WDI has made these asset upgrades and investments relevant to this Application as it also seeks to rely on the position that some or all these assets will be stranded and/or duplicated. Hydro One's position is that they were 'purpose built'⁴ by WDI to expand the WDI distribution system to supply the Subject Area and thus, in determining which connection is more technically efficient and cost-effective, this information is material and relevant to this *specific* proceeding.

Order to Respond to Hydro One Interrogatory question 7(e) and (f); update Interrogatory question 1 (d); and, additional questions noted in Hydro One letter dated December 2nd, 2025

In WDI's December 4th letter it further disclosed "inadvertently omitted"⁵ correspondence between WDI and the developer which demonstrates that WDI understood in September 2022 (the Appended Materials) that the Subject Area was within the licenced service territory of Hydro One and WDI sought the Developer's support to reclaim the Subject Area through a future service area amendment application. This newly disclosed documentation by WDI further supports the relevance of Interrogatory questions 7 (e) and (f) in Hydro One's Motion and the additional questions found in Hydro One's letter dated December 2nd. The Appended Materials, in concert with WDI's admissions that the facilities referenced in Hydro One Interrogatories 7(e) and 7(f) were intentionally planned to serve incremental load growth, including the Subject Area, illustrates that the investments and their corresponding costs can be reasonably associated (either fully or in part) with WDI's proposed connection of the Subject Area and should be considered in the economic efficiency assessment of the two competing alternatives.

Hydro One repeats that procedural fairness, transparency, and a complete evidentiary record before the Board which includes answers to relevant interrogatories to WDI as identified in Hydro One's Motion and its December 2nd letter are critical for the Board to assess the public interest in accordance with the SAA

¹ WDI Letter dated December 4, 2025, par. 2.

² HONI- Intervenor Evidence, October 17, 2025, section 2.1.2.3 and Attachment 1—Subject Area Photo Evidence.

³ WDI Application, August 19, 2025, section 6.1.6 and WDI Interrogatory Responses, November 7, 2025, OEB Staff – 5 and HONI – 6, part c.

⁴ WDI Application, August 19, 2025, sec 3.1.

⁵ WDI Letter dated December 4, 2025, par. 3.

Principles. This further ensures no harm to all ratepayers and that economic and technical efficiency prevails in the Ontario electricity distribution sector.

All of which is respectfully submitted on December 12, 2025.

Sincerely,

A handwritten signature in black ink, appearing to read "Pasquale Catalano". The signature is fluid and cursive, with a large initial "P" and "C".

Pasquale Catalano

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