

Sent by email: registrar@oeb.ca

March 12, 2026

Attention: Ritchie Murray, Acting Registrar

Ontario Energy Board
2300 Yonge Street, 27th floor
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Mr. Murray:

**Re: Hydro One Networks Inc.
Leave to Construct and Expropriation Application – Welland–Thorold
Transmission Project - EB-2025-0290**

INTERROGATORIES FROM FUTECAN CANADA INC.

As per Procedural Order No. 2, Futecan Canada Inc. ("**Futecan**") has been granted the right to submit interrogatories in these proceedings. As a result, Futecan is requesting additional relevant information and documentation from Hydro One Networks Inc. ("**Hydro One**") through the following interrogatories. All interrogatories are in relation to the Futecan Property. Answers to these questions are relevant to section 96(2) issues (especially the interests of customers with respect to prices, and supporting economic growth) and the answers will assist in potentially resolving or narrowing Futecan's participation in this proceeding.

List of Interrogatories

1. Please identify any changes with respect to Hydro One's preferred routing alignment vis-a-vis the Segment¹ specifically related to the Futecan Property² since Hydro One submitted their application for Leave to Construct to the OEB, and in particular if Hydro One has reconsidered the preferred alternative, any alternative route alignment affecting the Property, or identified any new information that would materially affect the evaluation of such alternatives.
2. Please indicate if Hydro One will be pursuing the "Technical Option" routing alternative³ as their new preferred routing alternative, and how this will be operationalized through the current Leave to Construct application.
 - a. Please provide further information related to the "Technical Option" including the specific location, the width of the right-of way over or along the Futecan Property,

¹ "Segment" means the portion of the proposed Welland–Thorold Transmission Project located on, adjacent to, or within 50 metres of the Futecan Property.

² "Futecan Property" means the lands municipally known as located at 9941 Lundy's Lane where the Lundy Manor Wine Cellars are located.

³ The Technical Option is identified in purple on the Futecan Property at page 148 of the Application Materials.

the proposed location of the towers in relation to the Segment and the Futecan Property.

- b. Please provide a description of any considerations, factors or criteria that could alter Hydro One's decision with respect to route alignment and path for this Segment.
3. Please provide further information related to the "Technical Option" shown in purple on the Futecan Property at page 148 of the Application Materials and specifically provide the following information in relation to the "Technical Option" as compared to Hydro One's preferred routing alignment, related to the following criteria:
 - i) cost differences, including construction costs and anticipated costs for expropriation or land acquisition,
 - ii) timing differences for the construction of the project (i.e. if expropriation is necessary for Hydro One's preferred routing alignment but not necessary for the Technical Option);
 - iii) technical feasibility;
 - iv) safety and reliability;
 - v) constructability;
 - vi) environmental effects;
 - vii) land use compatibility;
 - viii) on-going ease of repair and maintenance including associated costs; and
 - ix) impacts on the Futecan Property as compared to the preferred alignment for which Hydro One is seeking OEB approval.

For clarity, the "preferred alternative" selected as per the Class EA, runs through a significant portion of the Futecan Property, where it veers away from the road allowance and transects the Futecan Property at a 45 degree angle, whereas the "Technical Option" runs along the road allowance at the edge of the Futecan Property.

Assuming that answers are received to the above interrogatories, Futecan does not plan to file its own evidence in this proceeding.

Yours truly,

Aird & Berlis LLP



Kristi Ross
Partner