EB-2026-0145 and EB-2026-0137

ONTARIO ENERGY BOARD

ERTH Corporation acquisition of
Tillsonburg Hydro Inc. and Westario Power Inc.

POLLUTION PROBE INTERROGATORIES
(Related to integrated THI/WPI questions)

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The following are interrogatories that relate to the merged utilities under ERTH following Phase 2, which is included in the net benefits statements of each application. References for each application are included and it would be more efficient for a combined THI/WPI response to be provided. If a joint response is not possible, please provide the individual responses in a format that we can consolidate.

THI/WPI-PP-31

Please provide a table which includes the current rebasing timeline for THI, Westario, and EPC. Please provide a column to show what the new proposed rebasing dates (or single date if combined) will be as impacted by the Phase 2 timeline following the EPC 2028 rebasing application.

THI/WPI-PP-32

a) Please provide a table of the net ratepayer benefits (and related time periods) expected from each of the THI, WPI, and EPC deferred rates periods. Please confirm that these amounts are each separate and cumulative. If not, please explain and provide the cumulative totals.

b) What procedures and controls will be in place to avoid double counting benefits and synergies between the EPC rebasing, THI acquisition and merger, and WPI acquisition and merger (including Phase 2)?

THI/WPI-PP-33

Reference: Upon completion of the EPC CoS Application, EPC, WPI and THI will bring a second application to the Board to approve the second phase ("**Phase 2**") of the transaction to allow for the amalgamation of EPC, THI, and Westario under section 86(1)(c) of the OEB Act. [THI Page 19 and WPI Page 21]

a) Please explain how ERTH is planning to reconcile costs and net benefits for the proposed THI and WPI 9 year deferred rates terms if a Phase 2 application is brought forward part way through the 9 year deferred rates period for THI/WPI?

b) Does implementation of Phase 2 end the 9 year THI or WPI deferred rates period prematurely? If no, why not. If yes, please explain the impacts, including net benefits expected from Phase 1.

c) Does ERTH anticipate requesting a new deferred rates period for the merged utilities (EPC, WPI and THI) as part of the Phase 2 application? If yes, please provide how that would correlate to the deferred rates term approved as part of a Phase 1 decision for THI and WPI.

THI/WPI-PP-34

Reference: Figure 3: Phase 2 - Corporate Ownership Structure [THI Page 20 and WPI Page 20]

a) Please provide a short description of the business and services related to each box in Figure 3.

b) Please provide details on which elements of THI and WPI are subsumed by merged entity structure noted in Figure 3.

c) Please note which boxes in Figure 3 are unregulated or affiliates and explain if they will be providing services to THI and/or WPI.

THI/WPI-PP-35

a) When will THI and WPI file its updated Business Plan and Distribution System Plan (DSP)?

b) When will the fully merged utility have an integrated Business Plan and Distribution System Plan (DSP) based on the merged utility and when would it be filed with the OEB?

c) In the interim, how will the Business Plan and/or DSP be coordinated between THI/WPI and EPC?

THI/WPI-PP-36

Reference: If this Application is approved, the combined ownership of WPI/THI and EPC by ERTH will allow the LDCs to access capital at lower interest rates versus stand-alone utilities that are not commonly owned. [WPI Page 32 and THI Page 27]

Please provide details on the lower capital costs expected for WPI and THI and what the annual savings are forecasted to be per year for each utility.