EB-2026-0057

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15 (Schedule B);

AND IN THE MATTER OF an Application by Milton Hydro Distribution Inc. to the Ontario Energy Board for an Order or Orders approving or fixing just and reasonable rates and other service charges for the distribution of electricity as of January 1, 2027.

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

SEC-1
[Appendix D] Please provide a copy of the internal business case regarding the Palermo project.

SEC-2
[Application, p.25] Please provide Milton Hydro's total net capital in-service additions for each year between 2023 and 2027.

SEC-3
[Appendix D, p.2] Please provide the forecast annual net costs of the Palermo project and bill impacts, taking into account the reduction in charges paid to Hydro One from the proposed elimination of the embedded distributor arrangement, and any change in the amounts paid to Oakville Hydro, for use of the Glenorchy MTS. Please provide full calculations.

SEC-4
[Appendix D, p.3] For each task in Table 1, please provide the status and any revisions to the completion date (actual or forecast).

SEC-5
[Appendix D, p.5] Please provide a detailed breakdown of the 2023 to 2027 actual and forecast capital expenditures for the Palermo project.

SEC-6
[Appendix D, p.6] With respect to the incremental upgrade costs and amounts payable to Hydro One:

a. Please provide a copy of the Connection Cost Recovery Agreements between Milton Hydro and Hydro One (if not the final executed agreement, then the latest draft).
b. Please provide the underlying basis and the supporting documents for the determination of the difference between like-for-like replacement costs and incremental costs.
c. Please provide a live copy (with formulas intact) of the completed Hydro One economic evaluation model used to determine the capital contribution payable by Milton Hydro.

SEC-7
[Appendix D, p.12-13] With respect to Figures 1 and 2:

a. Please provide a revised version of Figure 2 that shows the total capacity of each station (available to Milton Hydro) under the Palermo TS/Glenorchy MTS arrangement.
b. Please provide an Excel version of the existing Figure 2 and the revised version sought in part (a).
c. Please confirm that with the Glenorchy MTS capacity retained, Figure 1 shows that the demand forecast under both reference and low scenarios does not exceed current capacity until 2032 and 2036 respectively.
d. For each year between 2027 and 2036, and for each planning scenario, please provide Milton Hydro's load at Palermo TS, split between, i) load on the two existing feeders, and ii) load on the two new feeders.

SEC-8
[Appendix E, p.36, Table 26] In the 2024 Power Advisory/EPE Consulting Ltd., *Milton Hydro Capacity Needs Assessment Report* shows the two existing Palermo TS feeders with a planned limit of 19 MVA each, and forecast load of 28.9 MW in 2027 increasing to 32.6 MW in 2032 under the high growth scenario. Once the Palermo TS upgrade is in-service, please explain why Milton Hydro could not serve incremental load at Palermo TS using the existing feeders until that capacity is used.

SEC-9
[Appendix D, p.3, 12-13, 19-20] With respect to the feeder line extension:

a. Please provide the planned limit and forecast load for each existing Palermo TS feeder through 2036, under each demand scenario. For each feeder, please provide the year in which the load on those feeders would exceed the limit if the feeder line extension was not built.
b. Please provide details regarding specific customers or constraints that require the two new feeders to be in-service by September 30, 2027, as opposed to a later date.
c. In Table 12, Milton Hydro shows the difference in capital contributions for the TS Upgrade based on when the feeder extension is undertaken. Please provide the economic evaluations or other calculations supporting both scenarios (please provide it in live Excel spreadsheet with all formulas intact).
d. Please explain why deferring the feeder line extension would reduce the Palermo TS load forecast when Milton could connect the load using its existing feeders.
e. If the Glenorchy capacity is made permanent under the proposed Palermo TS/Glenorchy MTS arrangement, but the feeder extension is not built, in what year would Milton Hydro first be unable to connect a new customer, for each of the demand scenario?

SEC-10
[Application, p.31, Appendix E, p.7] Milton Hydro's evidence says no customer contributions offset the ICM. In the 2024 Power Advisory/EPE Consulting Ltd., *Milton Hydro Capacity Needs Assessment Report*, the consultants note that: "In accordance with the Distribution System Code and Transmission System Code, new customers with peak demands of at least 5 MW will be required to make contributions toward station costs or MHDI's contribution to Hydro One."

a. Please explain why no customer contributions offset the ICM.

b. Please identify all customers of 5 MW or more that will be served by the project, and why none are required to provide a capital contribution.

SEC-11
[Appendix G, Appendix D, pdf p.258] Please explain why Milton Hydro rejected NBM Scenario 4.

SEC-12
[Appendix L, p.21-22] With respect to capital contributions paid to Hydro One:

In Milton Hydro's 2023 DSP, the company stated that upsizing the Palermo TS was the regional planning end-of-life solution. On that basis, the company took the position that: "Once station capacity has increased, MHDI would seek to add new load to the station over time, subject to the available capacity, like any other load customer. Hydro One has indicated that a capital contribution may be required to address the incremental costs of increasing Palermo TS capacity. Per the Transmission System Code, as the station upgrade and associated cost is driven by end-of-life needs and not specific increased capacity needs by MHDI, MHDI takes the position that no capital contribution should be required to access the available capacity."

a. Please provide copies of correspondence in which Milton Hydro either disputed or accepted Hydro One's requirement for a capital contribution.
b. Please explain why in Milton Hydro's view circumstances have changed, such that a capital contribution is reasonable.

Respectfully, submitted on behalf of the School Energy Coalition, this October 1, 2026.



Mark Rubenstein
Counsel for the School Energy Coalition