VIA RESS and EMAIL

November 9, 2026

Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario M4P 1E4

Dear Ritchie Murray:

Re: London Hydro Inc. (London Hydro)
2027 Rates
Consumers Council of Canada (CCC) Interrogatories
OEB File No. EB-2026-0056

In accordance with Procedural Order No. 1, dated October 16, 2026, please find attached CCC's interrogatories with respect to London Hydro's 2027 Rates application.

Yours truly,

Lawrie Gluck

Lawrie Gluck
Consultant for the Consumers Council of Canada

cc: All parties in EB-2026-0056

London Hydro Inc.

2027 Rates

Consumers Council of Canada

Interrogatories

November 9, 2026

Exhibit 1 – Overview and Administration

1-CCC-1
Ref: Exhibit 1, p. 189
Exhibit 1, Appendix 1-12, pp. 26-36, 72

Question(s):

a) A large number of letters of comment opposing London Hydro's proposed rate increase were filed on the record. Please explain how these letters from London Hydro's customers reconcile with London Hydro's customer engagement results summarized at Exhibit 1, p. 189 (i.e., 70% of both residential and commercial respondents indicated support for the proposed level of investment or a higher level of investment).

b) With respect to the residential survey for the 2027-2031 proposed plan (Appendix 1-12, pp. 26-36), please explain how the bill impact changes shown for each the "spend more" and "spend less" options (i.e., replacing equipment, investing in technology, operations centre) were calculated.

c) Please provide the potential reasons why the "voluntary stream" results (Appendix 1-12, p. 72) are materially different from the other results set out in the survey (i.e., 48% suggest spending less overall).

d) With respect to the independent customer research (Innovative Study), please provide the detailed written comments that were provided by customers (i.e., the

more detailed responses where customers provided their views in writing as opposed to selecting an option in the survey).

1-CCC-2
Ref: Exhibit 1, p. 230

Preamble:

London Hydro will continue to identify and implement efficiencies, with a specific focus on driving down unit costs in areas where expenditures exceed historical averages by more than 20% or sit 25% above the industry baseline.

Question(s):

Please identify each APB metric for which London Hydro's 2025 actual or 2027 forecast result exceeds its historical average by more than 20% or is 25% above the industry baseline. For each metric, please describe the efficiencies implemented by London Hydro (and if available, provide an estimate of the costs savings reflected in the 2027 capital and operational budgets).

1-CCC-3
Ref: Exhibit 1, pp. 234-242

Preamble:

Investment in technology, including the Company's own 'in-house' development capabilities, are key to achieving operation excellence, building for the future, supporting sustainable energy solutions, and delivering high-quality customer service.

Question(s):

a) Please provide a list that shows all internally developed applications and platforms (e.g., DRS, mobile app, etc.). For each application/platform, please advise whether the Company evaluated commercially available alternatives. If this type of analysis was undertaken, please file the analysis (including any cost comparisons that were completed).

b) Please provide a single table showing the number of IT-related FTEs in each year of the 2022-2027 period, the total number of customers, and the number of customers per FTE.

c) Please advise whether London Hydro has undertaken any benchmarking of its IT-related costs or staffing levels. If so, please file the relevant benchmarking report/study.

1-CCC-4
Ref: Exhibit 1, pp. 269-270

Preamble:

With respect to O&M, there is no general assumption for inflation as the 2026 Bridge Year and 2027 Test Year were built from the ground-up. The increases in labour are discussed in Exhibit 4, and the non-labour increases have been budgeted on an individual case basis.

In order to prudently budget its capital expenditures, London Hydro applied an inflationary factor of 5% to materials included in the development of the capital budgets for both the 2026 Bridge Year and the 2027 Test Year.

Question(s):

a) With respect to the O&M budget, please:

i. Provide the inflationary assumptions applied with respect to contracted labour for 2026 and 2027.

ii. Provide the weighted-average non-labour inflation rates (or increases that have been budgeted on an individual case basis) applied across all operational programs for 2026 and 2027.

iii. Confirm, or correct, that the inflation applied to internal labour is 3.0% in each of 2026 and 2027. If this is not correct, please provide a detailed explanation of the labour inflation applied in 2026 and 2027 (and a breakout between union and non-union labour).

b) With respect to the capital budget, please:

   i. Confirm that the labour and contracted labour inflationary assumptions provided in part (a) are applicable to the capital budget. If this is not the case, please explain and provide the labour and contracted labour inflationary assumptions applied for the capital budget.

   ii. Please provide the inflated and uninflated capital-related material budget for both 2026 and 2027 in excel format in a manner that allows for the 5% inflation factor to be replaced by a different value.

Exhibit 2 – Rate Base and Capital

2-CCC-5
Ref: Appendix 2-AA
Exhibit 2, Appendix 2-5 (DSP), Appendix A1

Question(s):

a) Please provide a revised version of Appendix 2-AA (2022-2031) that shows for each sub-program (e.g., city works – road authority relocations, city works – RT works, etc.), the gross capital expenditures (before any recoveries or capital contributions), capital contributions and net capital expenditures. As part of this response, please update the 2026 capital expenditure forecast based on the most up-to-date actuals.

b) Please provide a revised version of Appendix 2-AA in the same format as requested in part (a) but on an in-service addition basis (using the most up-to-date actual ISAs for 2026).

c) To the extent that any capital program segments have moved from one program to another between the historical and forecast periods, please provide an additional revised version of Appendix 2-AA that shows the relevant program segment budgets recast without the movement.

d) Please provide an alternative capital expenditure table and an in-service addition table (Appendix 2-AA format) that removes the projects that the Company may seek ICM treatment for in the future from the proposed budgets.

e) Please advise whether the "recoveries" referenced for various budgets in Appendix A1 (System Access Material Investment Sheets) are capital contributions. If not, please explain.

f) Using the "City Works Projects" program as an example, please explain whether the proposed budget amount for 2027 of $2.633M shown in Appendix 2-AA is gross or net of capital contributions. It appears to be a net figure when compared to the relevant Appendix A1 tables. Please advise whether all of the system access programs are shown net of capital contributions in Appendix 2-AA and, if so, explain what is then reflected in the system access capital contribution line (Line 22).

2-CCC-6
Ref: Exhibit 2, pp. 6-7, 52

Question(s):

a) Please confirm that London Hydro applies the half-year rule in the determination of rate base and depreciation expense on a forecast basis.

b) Please confirm, or correct, that for historical actuals, capital additions and depreciation expense are determined based on the quarter that an asset is placed in service.

c) Please explain why a quarterly approach to the calculation of forecast rate base and depreciation expense was not applied in the current proceeding. Please also provide:

   i. The historical 2022-2025 actual additions on a quarterly basis (and monthly basis if available).

   ii. A forecast for in-service additions for 2026 and 2027 on a quarterly basis (and monthly basis if available)

   iii. The rate base and depreciation expense for 2026 and 2027 derived using the quarterly approach (and monthly approach if available).

2-CCC-7
Ref: Appendix 2-BB
Exhibit 2, p. 50

Question(s):

a) With respect to "Computer Equipment – Hardware," please provide the year that the change to useful life was made (i.e., 3 years to a range of 3-5 years).

b) To the extent that the change to "Computer Equipment – Hardware" was made during the term of the previous IR period, please provide the annual impact on depreciation expense in the year that the change was made until rebasing.

c) Please confirm that no other changes were made to asset useful lives (except for "Computer Equipment – Hardware").

2-CCC-8
Ref: Exhibit 2, pp. 59-60
Exhibit 2, Appendix 2-5 (DSP), pp. 194-195, 217-218
Exhibit 4, pp. 297-298
Exhibit 9, pp. 48-49

Preamble:

In July of 2026, London Hydro and its system integrator came to the mutual agreement to terminate the contract.

The CIS Refresh project is currently paused while London Hydro evaluates its options for moving forward.

London Hydro confirms that no capital costs associated with the paused CIS Refresh project have been included in rate base in this application. However, as noted above, specific project work classified as Repurposed Capital has been transferred from the CIS Refresh scope into the 2026 and 2027 Application Development capital programs... London Hydro is seeking disposition of the balances tracked in the Incremental Cloud Computing Implementation Costs deferral account for a distinct cloud implementation project, a Customer Information System ("CIS") Refresh (SAP S/4 HANA) project. The

recorded amounts in this account represent third-party Infrastructure-as-a-Service (IaaS) costs directly associated with the implementation of this cloud solution.

Question(s):

a) Please file the EY "Replanning Update" report, the revised project plan approved in December 2025, and a summary of the system integrator termination agreement (and provide any costs incurred associated with terminating the contract).

b) Please provide a single table showing all of the costs incurred with respect to the CIS Refresh project (broken out between capital and operational costs) by year and in total.

c) Please further explain the proposal regarding "Repurposed Capital" from a ratemaking perspective. More specifically, please explain whether capital costs previously incurred on an actual basis are proposed to form part of new 2026 and 2027 capital budgets. Please also provide the total dollar amount of the "Repurposed Capital" and a detailed breakdown of these capital costs (and specify the capital program where these costs are recorded).

d) Please advise whether there are any ongoing CIS Refresh Project-related operational costs reflected in any of the 2027 OM&A program budgets. If so, please quantify the amount (and specify the operational program where these costs are recorded).

e) With respect to the historical actual operational costs incurred for the CIS Refresh Project that was later terminated, please confirm that the Company is seeking recovery of $2.5M (inclusive of interest) in the Incremental Cloud Computing Implementation Costs deferral account.

f) Please provide the detailed calculation, including all assumptions, supporting the 2026 forecast cost of $0.8M recorded in the Incremental Cloud Computing Implementation Costs deferral account.

g) In the context of the Company's decision to pause the CIS Refresh Project, please explain why the amounts related to this project are recoverable from ratepayers through the Incremental Cloud Computing Implementation Costs deferral account.

2-CCC-9
Ref: Exhibit 2, pp. 62-66
Exhibit 4, pp. 55-59

Preamble:

While no significant changes have occurred since the 2022 rebasing, the policy was updated to provide additional clarity as follows:

- Revised criteria for costs eligible for capitalization related to Overhead Labour and Materials Management overhead burdens.

London Hydro's process related to overhead costs includes periodic reviews to help ensure that all directly attributable costs related to self-constructed assets are captured and properly allocated to capital projects based on predetermined rates.

Question(s):

a) Please confirm that the 2027 OM&A and capital forecasts fully reflect the updated overhead capitalization policy changes implemented on January 1, 2024.

b) Please file copies of all analysis/reviews/studies/benchmarking completed with respect to the capitalization changes implemented for overhead labour and materials management. As part of the response, please explain any differences between the results of the internal or external analysis and the rates shown in Table 2-27.

c) Please advise whether London Hydro sought approval, during the previous IR term, for a deferral account to record the financial impact of the change to overhead capitalization effective January 1, 2024. If not, please explain why the Company did not seek such approval. Please also advise whether the change was disclosed to the OEB in a previous IRM update application or RRR filing.

d) Please provide detailed calculations supporting the impact on operational expenses of the overhead capitalization change as set out in Table 4-15. As part of the response, please also reconcile the 2024 impact of $1.86M in Table 4-15 to the $1.7M impact shown in Table 4-16.

e) Please provide an updated version of Table 4-15 based on the most up-to-date forecast of the impact on operational expenses of the overhead capitalization change. Please also provide the supporting calculations.

f) Using the most up-to-date information regarding the impact of the overhead capitalization change, please file a table similar to the table filed by Alectra in EB-2025-0252, Exhibit 9, Tab 3, Schedule 11, Attachment 9-10, for the 2024-2026 period.

g) Please provide a table that shows the difference in 2027 opening, closing and average rate base and 2027 capital-related revenue requirement (with return on rate base, depreciation and PILs shown separately) in the scenario that the overhead capitalization change was implemented on January 1, 2027 instead of January 1, 2024.

2-CCC-10

Ref: Exhibit 2, p. 57
Exhibit 2, Appendix 2-5 (DSP), pp. 2, 14-15

Question(s):

a) Please provide a table that sets out, for each potential ICM project, the following:

   i. Name of the project

   ii. Summary description for the project

   iii. Current estimated project cost

   iv. Current estimated in-service date (month and year)

b) Please confirm that the total cost for these potential ICM projects is equivalent to the "major strategic projects" budget of $151.2M over the 5-year term. If this is not correct, please explain the differences.

2-CCC-11

Ref: Exhibit 2, Appendix 2-5 (DSP), pp. 1-2

Preamble:

Through a rigorous review of the initial comprehensive needs-based capital plan, London Hydro reprioritized investments, optimized project scope, and adjusted pacing, resulting in approximately $130 million in capital savings over the five-year planning period, and at the same time, continuing to address its core asset management, reliability, and growth requirements.

Question(s):

Please provide a table, in Appendix 2-AA format, that shows the capital plan prior to the reprioritization exercise, the proposed capital plan and the variance by capital program.

2-CCC-12

Ref: Exhibit 2, Appendix 2-5 (DSP), pp. 137-151
Exhibit 3, p. 6

Question(s):

Please provide a single table for the 2022-2031 period (or with additional historical and forecast years to the extent that the information is available) that includes the following:

i. Actual Demand (MW)

ii. Actual Weather Normalized Demand (MW)

iii. Forecast Demand (MW) used for capital planning purposes (both the prior capital planning forecast and the current capital planning forecast)

iv. Actual / Forecast (MW) System Capacity

As part of the response, please also explain any differences between growth rates in the capital planning forecast relative to those applied for the revenue forecast set out in Exhibit 3.

2-CCC-13
Ref: Exhibit 2, Appendix 2-5 (DSP), pp. 204-206

Question(s):

a) For forecasting purposes, please explain how London Hydro converts capital expenditures to in-service additions. More specifically, please explain how the Company estimates when (i.e., in what year) each category of capital spending (e.g., city works projects, transformer stations, etc.) will enter service.

b) Please advise whether the CWIP amounts shown in Table 65 reflect the changes in CWIP year-over-year. If so, please provide a table that shows the forecast total CWIP amounts for each year of the 2027 to 2031 period and explain the major drivers of the change.

c) Please explain the statement that "the capital plans do not materially impact O&M costs."

2-CCC-14
Ref: Exhibit 2, Appendix 2-5 (DSP), pp. 208-219

Preamble:

Over the five-year period from 2022 to 2026, the expected capital spending will exceed net planned spending by $62 million (32%).

Question(s):

a) For each specific capital project (not program) undertaken during the 2022-2026 period with a total cost greater than London Hydro's current materiality threshold ($549,000) and a cost variance between planned and actual greater than 10%, please provide:

   i. The project name and investment category (i.e., the program-level category in Appendix 2-AA)

   ii. A brief description of the project

iii. The original budgeted cost (reflecting the forecast cost shown in the Company's 2022-2026 DSP (if applicable))

iv. The actual (or current forecast) total cost (gross and net)

v. The forecast and actual contributions (if applicable)

vi. The variance between the planned budget and final cost (in dollars and percent)

vii. The planned and actual in-service dates

viii. A detailed explanation for the cost variance.

b) With respect to the Reservoir Park Communications Tower Replacement, in addition to the information requested in part (a), please explain the "strategic collaboration" with the City of London and any cost sharing provisions.

c) With respect to the London Hydro Operations Centre Facility, please provide the total cost of the land purchase and confirm that the entire amount is held in CWIP.

d) More generally, with respect to land purchases, please confirm that the land only enters rate base after the relevant asset that will use the land is completed and enters service.

2-CCC-15
Ref: Exhibit 2, Appendix 2-5 (DSP), pp. 219-222
Exhibit 2, Appendix 2-5 (DSP), pp. 90-136

Question(s):

a) Please advise whether the "2019 Planned FFA" is the number of assets to be replaced in total at the time the study was completed or an annualized figure.

b) Please confirm that the other columns (i.e., Actual ACA-Targeted Replacements, Actual Other Replacements and Actual Total Replacements) reflect the total 2022-2026 replacements.

c) With respect to the "Actual Other Replacements," please explain the impact of these replacements on the ACA FFA asset quantities. More specifically, do these other replacements operate to reduce the number of FFA assets.

d) Using the current ACA categorization of assets (i.e., very poor, poor, etc.), please provide a table that shows the number of assets in very poor and poor condition (by major asset category), and the number of assets planned for replacement in each year of the 2027-2031 period. As part of the response, please reference the capital program under which these assets are planned for replacement.

2-CCC-16
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1

Question(s):

a) Please provide a single table, which includes each capital project described in the Material Investment Project Sheets, that shows:

   i. The alternatives considered

   ii. The basis for rejecting the alternative

   iii. The cost estimate of the alternative (by year for the forecast period)

b) For each capital project described in the Material Investment Project Sheets where the investment priority score is marked as "N/A," please explain how the Company ranked those projects against other capital projects that do have priority scores.

2-CCC-17
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project D1, pp. 1-2

Question(s):

a) Please explain the reduction to the ratio of contributed capital between 2022-2025 actual (48.7%) and 2027-2031 forecast (35%). As part of the response, please explain the basis for the 35% capital contribution rate (including the assumed split between labour and materials in the context of the PSWHA cost recovery of 50% for certain aspects of total project costs).

b) Please provide a table showing each individual relocation project forecast over the 2027-2031 period, the forecast cost of the project (gross, net and contributed capital), and the year(s) in which the work will take place.

2-CCC-18
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project D2, pp. 1-2

Question(s):

a) Please explain the basis for the 40% capital contribution rate (including the assumed split between labour and materials in the context of the PSWHA cost recovery of 50% for certain aspects of total project costs).

b) Please explain the reason for actual contributed capital of 74% in 2025, which is significantly higher than in prior years and the forecast period.

c) Please provide a table showing each individual RT works forecast over the 2027-2031 period, the forecast cost of the project (gross, net and contributed capital), and the year(s) in which the work will take place.

2-CCC-19
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project E1, pp. 1-2

Preamble:

The proposed budget is based on current open inquiries by developers and third parties considering historical spending in the years when we were not constructing any large expansion projects. The current tentative projects between 2026 and 2031 are:

- Innovation Park Phase 5 - UG civil work within Phase 5
- Innovation Park Phase 5 - OH backup

- Developer driven expansions
- Clarke TS M2 Towerline Relocation

Question(s):

a) For each of the projects described in the preamble (including a detailed breakout of the "developer driven expansions"), please provide a table showing:

   i. Total cost (gross, net, contributed capital)

   ii. In-service date

   iii. Current status of the project

   As part of the response, please also provide the detailed spreadsheet(s) that show how the projects costs were estimated and how the capital contribution was derived.

b) Please explain the basis for the average 14% contributed capital rate (2027-2031) and explain the decline from the 2022-2025 historical actual average of 21.1%. Please also advise whether economic evaluations in accordance with the DSC were completed for these projects. If so, please provide the relevant economic evaluations.

2-CCC-20
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project E2, pp. 1-2

Preamble:

This budget item is for the replacement of existing overhead low voltage service conductors with larger capacity conductors. These connections are typically required when customers increase their electrical service demands. This budget item includes all costs associated with these basic service upgrades. For an upgrade to a service level higher than the basic connection, London Hydro may charge a reasonable fee for the portion of the upgrade beyond basic service.

Question(s):

a) Please confirm that the historical and forecasted costs associated residential secondary service upgrades reflect only the upgrade to the basic service (and exclude any costs associated with upgrades beyond basic service). If not, please explain.

b) Please provide the "reasonable fee" that is charged for an upgrade beyond basic service.

c) Please provide a table that shows for each year of the 2022-2031 period the total cost of the program, the number of service upgrades completed, and the unit cost per service upgrade.

2-CCC-21

Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project E3, pp. 1-2

Question(s):

a) Please explain the significant reduction in new single family residential underground distribution work completed in 2025 relative to the historical period.

b) Please further explain the basis for the significant increase in single family residential growth spending in 2027 relative to 2025.

c) Please provide specific references (including links if available) to the single family housing forecasts that are being used by London Hydro to estimate the number of connections that will be required over the 2027-2031 period.

d) Please provide a table that shows for each year of the 2022-2031 period the total cost of the program (gross and net), the number of single family homes connected, and the unit cost per connection.

e) Please discuss the methodology used to derive the capital contributions that are forecast for this program.

2-CCC-22

Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project E4, pp. 1-2

Question(s):

a) Please provide a table that shows for each year of the 2022-2031 period the total cost of the program (gross and net), the number of multi-unit residential homes connected, and the unit cost per connection.

b) Please provide specific references (including links if available) to the multi-unit housing forecasts that are being used by London Hydro to estimate the number of connections that will be required over the 2027-2031 period.

c) Please discuss the methodology used to derive the capital contributions that are forecast for this program.

2-CCC-23
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project E5, pp. 1-2

Question(s):

a) Please provide a table that shows for each year of the 2022-2031 period the total cost of the program (gross and net), the number of commercial facilities connected, and the unit cost per connection.

b) Please provide specific references (including links if available) to the commercial and industrial growth forecasts that are being used by London Hydro to estimate the number of new commercial connections that will be required over the 2027-2031 period.

c) Please explain why this program does not attract capital contributions. If capital contributions have been received historically (and are forecast for the 2027-2031 period), please reference where these amounts are recorded and provide a table showing the capital contributions for each year of the 2022-2031 period.

2-CCC-24
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project M1-M4, pp. 1-6

Question(s):

a) Please explain the methodology applied to forecast metering costs for the 2027-2031 period. As part of the response, please explain the significantly higher metering costs forecast for the test year relative to the rest of the IR term.

b) Please provide a breakdown of the program costs as between each of the four categories of expenditures (i.e., M1 to M4) for each year of the 2022-20231 period.

c) Please provide an analysis of the historical and forecast metering costs on unit cost basis. This analysis should include total costs, numbers of meters replaced / forecast to be replaced, and actual/forecast unit costs.

2-CCC-25

Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project MMM, pp. 1-6

Question(s):

a) Please file the business case that evaluated different pathways for AMI upgrades and replacement. In addition, please file any external consulting reports related to the AMI and meter refresh program.

b) Please provide a more detailed breakdown of the 2022-2031 costs incurred / forecast to be incurred with respect to the AMI Refresh program. As part of this response, please provide the number of meters to be replaced and the unit costs per meter.

c) Please explain the treatment of early retirement/replacement of meters under the AMI Refresh program. More specifically, please provide details regarding derecognition costs forecast for the 2027-2031 period (including a specific reference to where these derecognition costs are shown in the application).

2-CCC-26

Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project B2, pp. 1-6

Preamble:

Medium-voltage polymeric cable rejuvenation using silicone injection was considered as an alternative; however, it was rejected based on London Hydro's past experience with higher lifecycle costs, recurring post-treatment failures, and reduced manufacturer warranty support.

Question(s):

a) Please provide a more detailed explanation of the methodology used to forecast costs in the subdivision rebuild program.

b) Please provide a detailed breakdown by activity (e.g., underground cable replacement, pad-mounted transformer replacement, etc.) of the costs associated with this program for each year of the 2022-2031 period.

c) Please provide any internal or external analysis completed with respect to underground cable replacement vs. cable injection.

d) Please provide the historical data supporting London Hydro's claim regarding "higher lifecycle" costs of cable injection.

e) Please advise whether London Hydro plans to undertake any cable injection over the 2027-2031 period.

f) Please provide the unit cost differential between cable injection and cable replacement.

g) Please provide a table showing the km of underground cable proposed for replacement in each year of the 2027-2031 period. If possible, please provide the length of cable associated with each subdivision planned for rebuild.

2-CCC-27
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project B4, pp. 1-6

Preamble:

This budget could replace up to 100 single-phase units and up to 25 three-phase units per year. These are units that have already failed in the field or simply need to be replaced due

to imminent failure. Among the replacements, some very aged and deteriorated live-front transformers may also be removed from service and replaced with newer standard dual load-break switch distribution transformers. In addition, car accidents also require removal of units that are damaged in the field regardless of their condition, and this budget covers those circumstances as well.

Question(s):

a) Please provide a more detailed explanation of the methodology used to forecast costs in the deteriorating/leaking transformer replacements program.

b) Please provide a detailed breakdown of the number of units and costs based on the reason for forecast replacement (e.g., already failed, imminent failure, third-party damage) of the costs associated with this program for each year of the 2022-2031 period.

c) Please further explain the large increase in the planned number of units to be replaced from 70-80/year historically to 125/year on a forecast basis.

2-CCC-28
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project B9, pp. 1-6

Question(s):

a) Please further explain the methodology applied to forecast costs in the 4.16 KV UG conversion program for the 2027-2031 period. As part of the response, please explain the volatility in annual budgeted costs over the 2027-2031 term and the significant increase in activity in this program relative to the historical period.

b) Please provide a detailed breakdown by activity (e.g., rear lot conversion, other, etc.) of the costs associated with this program for each year of the 2022-2031 period.

c) If the program is implemented as proposed, please advise how many rear-lots would remain to be converted after 2031.

2-CCC-29
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project B12, pp. 1-6

Question(s):

a) Please provide a more detailed explanation of the methodology used to forecast costs in the three-phase customer rebuilds program.

b) Please provide additional details regarding the frequency and duration of outages to customers served by the three-phase underground cables planned for replacement through this program.

c) Please provide a table that shows the km of three-phase underground cable replaced / proposed for replacement in each year of the 2022-2031 period. In the same table, please also provide the annual total costs and units costs per km.

2-CCC-30
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project C1, pp. 1-6

Question(s):

a) Please provide a detailed breakdown by activity (e.g., feeder replacement, new feeder construction, etc.) of the costs associated with this program for each year of the 2022-2031 period.

b) Please confirm that the proposal is to replace two new feeders (at Talbot TS and Nelson TS). Please provide the total cost of each specific feeder replacement and the planned in-service date.

c) Please advise whether the requirement for the construction of two new feeders is being driven by specific requests for service. If not, please explain. If so, please provide details with respect to these service requests.

2-CCC-31
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project C4, pp. 1-6

Question(s):

Please provide a table that shows the following for each specific project planned to be undertaken through the New Main Feeder Ties program:

i. Name of Project

ii. Description of Project

iii. Rationale for Project

iv. Total Cost of Project

v. Capital Expenditures Year(s)

vi. In-Service Year

2-CCC-32
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project F2, pp. 1-6

Question(s):

a) Please provide a table that shows the number of km of cable reactively replaced / proposed for reactive replacement in each year of the 2022-2031 period. In the same table, please also provide the annual total costs and units costs per km.

b) Please further discuss the statement that "[a]lthough past budgets were sufficient to address necessary faulted cable scenarios and the number of cable faults has not significantly increased, incidents of copper theft are on the rise." As part of the response, please discuss whether the increased funding proposed for the 2027-2031 period relative to the historical period is entirely related to copper theft.

2-CCC-33
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project G1, pp. 1-6

Question(s):

Please provide a table that shows the number of poles replaced / proposed for replacement in each year of the 2022-2031 period. In the same table, please also provide the annual total costs and units costs per pole.

2-CCC-34
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project G3, pp. 1-6

Question(s):

a) Please provide a detailed breakdown by activity (e.g., area rebuild, installation of secondary breakaway conductors, etc.) of the costs associated with this program for each year of the 2022-2031 period.

b) Please provide the number of area rebuilds that are planned each year of the 2027-2031 period.

2-CCC-35
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project AA, pp. 1-6
Exhibit 2, Appendix 2-5 (DSP), Appendix A2-1, MTS-1 Business Study, p. 16, Appendix 2 (Preliminary Budget)

Question(s):

a) Please advise whether the planned in-service date for MTS-1 is summer 2031 and that MTS-1 is one of the potential ICM requests that will be filed during the upcoming IR term. As part of the response, please also discuss whether there will be a potential ICM request related to MTS-2.

b) Please explain the difference between the Project AA total of approximately $77M and the $56.6M budget for the 125 MVA self-build option set out in Appendix 2 of the MTS-1 Business Study. To the extent that the difference is related to planned MTS-2 expenditures, please provide a full breakdown of the costs for MTS-1 and MTS-2 (by year) included in the 2027-2031 forecast period.

c) Please provide a detailed breakdown of the 2027 capital expenditure amount of $14.9M and explain why it significantly higher than the amount set out in Appendix 2 to the MTS-1 Business Study.

d) Please reconcile the project costs on p. 16 of the MTS-1 Business Study (i.e., $55M with land but excluding connection costs) to Appendix 2 of the same study.

2-CCC-36

Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project H1, pp. 1-6

Question(s):

a) Please provide a detailed breakdown by activity (e.g., replacement of deteriorated automated switches, installation of new reclosers, etc.) of the costs associated with this program for each year of the 2022-2031 period.

b) Please provide a table showing the number of units (by type) replaced each year of the 2022-2031 period. As part of this table, please include the total costs and unit costs.

2-CCC-37

Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project H2-H5, pp. 1-8
Exhibit 2, Appendix 2-5 (DSP), Appendix F (IT Asset Management Framework), p. 2

Question(s):

a) Please provide a detailed breakdown by sub-program (e.g., Serial Conversion Program (H2), RTU Refurbishment (H3), etc.) of the costs associated with this program for each year of the 2022-2031 period.

b) For each sub-program, please provide the actual / forecasted number of units replaced.

c) The IT Asset Management Framework states that the SCADA system is managed under separate operational asset and control frameworks. Please file the documentation associated with these frameworks. As part of the response, please discuss how SCADA asset replacement needs are identified and prioritized.

2-CCC-38

Ref: Exhibit 2, p. 46
Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project H14, pp. 1-5
Exhibit 2, Appendix 2-5 (DSP), Appendix A2-2 (ADMS/DERMS Business Case and ATOM Report)

Question(s):

a) Please provide the total in-service amount related to the ADMS / DERMS project forecast for 2027.

b) Please advise whether London Hydro expects to seek ICM funding for any portion of this project during the 2028-2031 IRM term. If so, please discuss the timing and associated amounts of any such ICM request.

c) Please advise whether the "ADMS Project Proposal" referenced in the Project H14 capital project summary sheet is the ADMS / DERMS Business Case filed at Appendix A2-2. If not, please file this project proposal.

d) Please file any additional reports/studies/business plans referenced as being "refined" with a consultant in 2026.

e) Please provide a status update with respect to vendor selection (which is expected to be completed by the end of 2026). As part of this response, please discuss any implications for expected in-service timing.

f) Please provide a table showing a more detailed breakdown of the ADMS/DERMS project costs for each year of the 2027-2031 period. The more granular breakdown should separate ADMS and DERMS costs and include cost categories (e.g., software licensing, system integrator, internal labour, consultants/Owner's Engineer, hardware, contingency).

g) Please explain the difference between the $11.8M cited in the Project H14 capital project summary sheet and the $13.4M cited in the ATOM Business Case.

h) Please advise whether the Company intends to seek (or has already sought) NRCan funding for the project. If so, please explain how NRCan funding is expected to be

treated from a ratemaking perspective (and advise whether any NRCan funding has been assumed in the application).

i) Please file the detailed benefit-cost analysis summarized in the ATOM Report.

j) With respect to the benefit-cost analysis methodology described in the ATOM Report, please explain:

   i. The basis for the 20% increase in SAIDI assumption

   ii. The basis for the assumption that 15% of London Hydro's customers have back-up generators

   iii. Why societal benefits are included in the analysis

k) Please provide more detailed information regarding the current OMS (including the vendor support status).

l) With respect to the statement that there is a proliferation of Distributed Energy Resources and electric vehicles driving the investment in ADMS / DERMS, please provide a single table showing for each year of the 2022-2031 period, the following:

   i. The cumulative number and total capacity (MW) of DER's connected to London Hydro's system.

   ii. The cumulative number of EV's in London Hydro's service territory.

2-CCC-39
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project CC, pp. 1-5

Question(s):

a) Please provide a table that sets out the transformer stations at which new bus-tie reactors are planned for construction (or if not yet selected, the possible stations). As part of the response, please explain the criteria used for selecting the relevant transformer stations.

b) Please provide a more detailed explanation of the methodology used to forecast capital contribution(s) paid to Hydro One related to this program. As part of the response, please provide any documentation received from Hydro One with respect to the estimated quantum of the capital contributions.

c) Please confirm that the main driver of this program is to facilitate the connection of incremental DERs. If this is not correct, please explain.

2-CCC-40
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project Q, pp. 1-4

Question(s):

a) Please further explain the very significant increase in office-related expenditures in 2027 relative to the historical period.

b) For the historical period (2022-2026), please provide a breakdown of expenditures in the same format as the table in the "Project Overview" section of the Project Q Capital Project Summary Sheet.

2-CCC-41
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project R, pp. 1-5

Question(s):

a) Please provide further details with respect to the "Facilities Renovation Project." As part of the response, please provide the total cost of this project since initiation (inclusive of all related costs that are not covered by Project R).

b) Please explain how the Facilities Renovation Project has been coordinated with the planned Second Operations Centre. As part of the response, please provide details with respect to the departments (and FTEs) that will be accommodated in each of its existing facility and the planned new operations centre.

2-CCC-42
Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project RR, pp. 1-5

Question(s):

a) Please confirm that none of the costs associated with the Second Operations Centre are reflected in 2027 rate base. If this is not correct, please provide the amounts reflected in rate base.

b) With respect to Phase 1 of the project, please advise whether the intent is to use some of the purchased land for storage purposes (prior to construction of the operations centre). If this is the correct, please advise when Phase 1 of the project will enter service.

2-CCC-43

Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project N, pp. 1-5
Exhibit 2, Appendix 2-5 (DSP), p. 181

Question(s):

a) Please file a copy of the "Fleet Replacement and Maintenance Model."

b) Please file a table showing the number of vehicles by type (e.g., large trucks, light-duty vehicles, etc.) operated by London Hydro for each year of the 2022-2031 period.

c) With respect to the planned 2027 fleet purchases, please advise how many of each type of vehicle are replacements or incremental purchases. As part of the response, please discuss the rationale for any incremental fleet purchases.

d) Please provide a table that shows the number of vehicles by type that are at, or past, the budgeted replacement timing shown in Table 61 of Appendix 2-5.

e) Please provide the "comprehensive assessment" (i.e., review of mileage, maintenance cost trends, etc.) that was completed for each vehicle planned for replacement in 2027.

2-CCC-44

Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project V1, pp. 1-5

Question(s):

a) Please provide a detailed breakdown by spending category (e.g., computers, field and mobile devices, etc.) of the costs associated with the Hardware and Software program for each year of the 2022-2031 period.

b) Please explain why the proposed capital expenditures associated with the Hardware and Software program are above the average spending during the remainder of the IR term.

c) Please discuss the implications of cloud computing on IT-related capital spending.

d) Please provide a single table showing the total IT-related capital expenditures and the IT-related operational expenditures (including software maintenance and cloud services) for each year of the 2022-2031 period.

2-CCC-45

Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project W1, pp. 1-5
Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project W2, pp. 1-5

Question(s):

a) Please provide a detailed breakdown by sub-program (e.g., cyber security, settlement process update, customer engagement platform, system hardening and upgrades, etc.) of the costs associated with the Compliance and Sustainment program for each year of the 2022-2031 period.

b) The "Systems Hardening and Upgrades" initiative includes a financial system upgrade, and the "Collection and Billing Enhancement" initiative in Project W2 includes a comprehensive upgrade of the financial system. Please explain the relationship between these two projects.

2-CCC-46

Ref: Exhibit 2, Appendix 2-5 (DSP), Appendix A1, Project W2, pp. 1-5

Question(s):

Please provide a detailed breakdown by sub-program (e.g., reporting & analytics, operations damage assessment, collections and billing enhancement, financial system upgrade, etc.) of the costs associated with the IT New Capabilities program for each year of the 2022-2031 period.

Exhibit 4 – Operating Expenses

4-CCC-47
Ref: Appendix 2-JC

Question(s):

a) Please provide an updated version of Appendix 2-JC that reflects the most up-to-date forecast of 2026 operational expenses (and any related update to 2027 forecast OM&A expenses, if applicable).

b) Please provide a revised version of Appendix 2-JC that shows each of the operational program total costs broken out by activity (for example, the Operations and Maintenance Program should show the total costs for each of overhead distribution, forestry, underground systems, etc.,) for each year of the 2022-2027 period. Please use the most up-to-date forecast for 2026 as requested in part (a).

c) For all sub-programs/activities (e.g., forestry, underground systems, etc.) with material changes in costs between 2025 actual and 2027 forecast, please provide a discussion of the reason for the change in costs.

4-CCC-48
Ref: Exhibit 4, p. 11

Preamble:

For development of the proposed 2027 Test Year budget, London Hydro completed four formal versions of the OM&A budget before arriving at the final budget approved by the Executive Committee. Through this iterative review process, proposed OM&A expenditures were reduced by more than $3.7 million, with the most significant reductions relating to labour and benefit costs.

London Hydro made the prudent but difficult decision to pause the CIS Refresh known as Project Spark after parting ways with the system integrator on the project. This decision necessitated updates to the 2026 and 2027 budgets for both O&M and Capital.

Question(s):

Please file all formal versions of the OM&A budget (including any additional budget(s) that were created after the decision to pause the CIS Refresh).

4-CCC-49
Ref: Exhibit 4, p. 26

Preamble:

Following the OEB's decision, London Hydro sought to absorb the reduction through prudent cost management measures, including delaying the filling of vacant positions and deferring discretionary expenditures where operationally feasible. Despite these efforts, London Hydro was not able to achieve the $1,375,000 in savings agreed to in settlement.

Question(s):

a) Please further explain what initiatives / measures were undertaken by London Hydro to achieve the OM&A reduction agreed to in the settlement.

b) Please identify the productivity and efficiency initiatives reflected in the 2027 OM&A forecast. As part of the response, please provide the cost saving amounts associated with these initiatives. To the extent that there are no productivity initiatives resulting in 2027 operational cost savings, please confirm and explain why not.

4-CCC-50
Ref: Appendix 2-K
Exhibit 4, pp. 74, 76-82, 86-103

Question(s):

a) Please provide a revised version of Appendix 2-K that reflects the most up-to-date 2026 compensation forecast (and any related update to 2027 forecast, if applicable). As part of the response, please also provide the number of employees, total salary and wages (with a further breakout between base salary, overtime and incentive pay), total benefits and total compensation by the following categories: Executive, Management, Union, and Non-Union for each year of the 2022-2031 period. Please also include the total compensation allocated between capital and OM&A for each year.

b) Please provide a revised version of Chart 4-14 that shows the number of FTEs by program for each year of the 2022-2027 period. As part of the response, please specifically show the change by program between 2025 actual and 2027 forecast.

c) Please provide a detailed discussion of the change in FTEs by program between 2025 actual and 2027 forecast.

d) Please provide a revised version of Chart 4-15 that shows the number of FTEs by category for each year of the 2022-2027 period.

e) Please provide the information shown in Chart 4-17 (i.e., FTEs by work segment) in tabular format for each year of the 2022-2027 period.

f) Please provide a revised table, similar to Table 4-17, that shows the net FTE additions by workforce segment (including the job titles) between 2025 actual and 2027 forecast.

g) Please provide a revised version of explanation of the "net identified FTE additions" based on the change between 2025 actual and 2027 forecast.

4-CCC-51
Ref: Exhibit 4, pp. 104, 107

Question(s):

a) Please provide the historical actual/forecast vacancy rate for the 2022-2026 period. As part of the response, please explain the methodology used to derive the vacancy rate and provide the vacancy rate impact in dollars.

b) Please explain how the Company derived the $0.6M impact of the forecast vacancy allowance on OM&A costs in 2027.

c) Please further explain what the Company is showing in Chart 4-23 (Net OM&A Labour – 2022-2027). More specifically, please advise which categories of compensation are reflected in this chart.

4-CCC-52
Ref: Exhibit 4, p. 114

Question(s):

a) Please file the latest version of the MEARIE management salary survey.

b) Please explain why the MEARIE survey was not used as the primary market reference for compensation benchmarking purposes.

c) Please provide the results of London Hydro's most recent benchmarking based on the MEARIE survey. As part of the response, please provide the Company's average benchmarking results relative to the market median (P50) using the MEARIE peer group. Please include results at each sub-category of compensation that is benchmarking in the MEARIE survey (e.g., base salary, total cash compensation, etc.).

4-CCC-53
Ref: Exhibit 4, Appendix 4-3 (WTW Compensation Benchmarking Review), pp. 2-6, 8-11

Question(s):

a) Please advise whether executive positions were excluded from the WTW study. If so, please advise whether London Hydro has undertaken any compensation benchmarking for executive positions since 2022. If so, please file that analysis.

b) Please provide a mapping of London Hydro's job categories (i.e., executive, management, non-union) to the levels set out in the WTW study.

c) For each of the 38 benchmarked positions, please provide the name of the benchmarked position, the level associated with the benchmarked position, and the number of London Hydro incumbents in each level.

d) Please explain how the 38 benchmark positions were selected from the 97 non-union/management roles at London Hydro.

e) Please advise whether the market percentiles were derived from the full peer group of organizations for every benchmarked position, or whether different subsets (e.g., Energy Services only, General Industry only) were used for different positions. If subsets were used, please provide a table showing the subset used for each of the benchmarked positions.

f) Please confirm that the WTW study does not include pension or benefits. Please provide a revised comparison on a total remuneration basis (i.e., inclusive of pension and benefits) for the 38 benchmark positions. If this is not possible, please explain why and provide WTW's view on how London Hydro's pension and benefit costs compare to the peer group.

g) With respect to the "holiday bonus," please advise whether those amounts are reflected in the total target annual compensation analysis.

h) Please provide the percentage of base salary that the holiday bonus represented in 2025 at each level.

i) WTW recommended that London Hydro consider introducing a formal short-term incentive program for levels 10 through 13. Please advise whether the short-term incentive plan was introduced for 2027. If so, please provide the STI target percentages adopted by level, and advise whether the 2027 compensation budget reflects STI at target or at an expected payout. Please also provide the number of employees eligible for the STI program.

4-CCC-54
Ref: Exhibit 4, pp. 116-117

Question(s):

a) Please provide a revised version of Chart 4-27 based on the change in OM&A labour costs between 2025 actual and 2027 approved.

b) Please explain how the forecast of step progressions for 2026 and 2027 was developed and provide the step progression amount that is included in 2022-2025 actual and the 2026-2027 forecast.

4-CCC-55
Ref: Exhibit 4, pp. 136, 149-151

Question(s):

a) Please advise whether the size/quantum of the capital program correlates with the costs incurred in the Asset Management program. For example, if the future capital plan is larger, would additional costs be incurred by the asset management group?

b) Please provide the number of FTEs assigned to the asset management group that are involved in the preparation and implementation of the DSP.

c) Please provide a table that provides a more detailed breakout (e.g., training, professional development, etc.) of employee expenses for each year of the 2022-2027 period.

4-CCC-56
Ref: Exhibit 4, pp. 158, 182-187

Question(s):

a) Please a more detailed breakdown by activity (e.g., planned cyclical trimming, spot/as-needed trimming, reactive/emergency trimming, etc.).

b) Please provide the term of London Hydro's existing vegetation management contract(s). Please also explain the process that London Hydro undertook to enter the contract(s). As part of the response, please provide details about the RFP, the number of bidders, the selection process, etc.

c) Please provide the planned trimming cycle and the defined geographical areas (or feeders) used for planned tree trimming. As part of the response, please provide a table showing which area(s) were completed in each year of the 2022-2025 period and which area(s) are planned for 2026 and 2027. Please also advise whether different contractors are used for different areas.

4-CCC-57
Ref: Exhibit 4, pp. 194, 198
Exhibit 4, pp. 296

Preamble:

London Hydro continues to actively manage cloud costs through governance controls, vendor management practices, and regular reviews of system utilization. Decisions to migrate workloads to the cloud, retain on-premise solutions, or adopt hybrid architectures are made based on total cost of ownership, solution availability, operational risk, system criticality, and long-term sustainability considerations.

Question(s):

a) With respect to the software solutions set out in Tables 4-33 and 4-47, please discuss whether enhanced support is now provided by the relevant vendors in the context of the shift to subscription-based models.

b) For each of the major systems and platforms set out in Tables 4-33 and 4-47, please provide a table showing the current deployment model (on-premise, cloud or hybrid) and advise whether a cost-benefit analysis comparing the deployment model was undertaken. As part of the response, please provide any cost-benefit analysis that has been undertaken. To the extent that formal cost-benefit analysis was not undertaken, please explain how the Company decided what deployment model is most cost effective.

4-CCC-58
Ref: Exhibit 4, pp. 210-211, 216, 219-224

Question(s):

a) With respect to the contact centre, please provide the following for each year of the 2022-2027 period:

   i. The number of FTEs employed by London Hydo (broken down by position (e.g., CSRs, leads, supervisors and management)

   ii. The internal contact centre-related labour costs and the average total direct compensation per Contact Centre FTE

   iii. The cost of the third-party contact centre support agency

   iv. The number of customer contacts received each year (e.g., calls, emails, etc.)

   v. If available, the number of inquires addressed by internal and external staffing separately.

b) With respect to the forecast consulting fees set out in Table 4-35, please further explain the expected process improvements and operational efficiency that may result from these consulting engagements (as it appears that this spending began in 2026). As part of the response, please advise whether the Company has included any offsetting costs in its 2027 OM&A budget.

c) Please provide the number and percentage of total customers on paperless billing for each year of the 2022-2027 period. Please explain the methodology applied by the Company to forecast the number of customers on paperless billing for 2026 and 2027. As part of the response, please also provide the most up-to-date estimate of the number of customers currently on paperless billing.

d) Please explain the methodology used to forecast bad debt expense for 2026 and 2027. As part of the response, please provide the detailed spreadsheets, including all assumptions, that show the derivation of the 2026 and 2027 bad debt expense forecasts.

e) Please explain how the significantly increased spending on collection services and the expected improved collections performance is reflected in the bad debt expense forecast.

f) Please provide a table showing the costs reflected in the "other" expense category in the Customer Service and Collections program.

4-CCC-59
Ref: Exhibit 4, pp. 231-232

Question(s):

a) Please provide a table listing all of the positions/roles in the Corporate Communications department.

b) Please further describe the types of advertising campaigns that the Company is planning for 2027. As part of the response, please discuss the topics to be covered in each advertising campaign.

c) Please identify the portion of the 2027 advertising and promotion budget that relates to communications required by the OEB (e.g., regulatory notices, rate change communications, etc.) relative to brand, reputation and community-relations advertising.

4-CCC-60
Ref: Exhibit 4, p. 253

Question(s):

Please provide a table that provides a more detailed breakout of the costs reflected in the corporate employee expenses category for each year of the 2022-2027 period.

4-CCC-61
Ref: Exhibit 4, pp. 259-260, 267
Exhibit 6, p. 26

Question(s):

a) Please confirm that the 2027 forecast property tax associated with the new land related to the MTS-1 transformer station is $0.6M. As part of the response, please

explain how the property tax amount was estimated and confirm that MTS-1 is expected to enter service in 2031.

b) Please provide a detailed breakdown of the "other" category in the Facilities and Environmental Services program for each year of the 2022-2027 period.

4-CCC-62
Ref: Exhibit 4, pp. 268-274

Question(s):

Please provide a table showing the number of FTEs in each sub-program (e.g., executive services, financial services, etc.) in the Corporate Services program for each year of the 2022-2027 period.

4-CCC-63
Ref: Exhibit 4, pp. 199, 206, 260, 275-276, 292

Preamble:

The insurance program addresses general liability, Directors' and Officers' liability, crime, and cyber/privacy risks, with the majority of coverage placed through the primary insurance provider for Ontario local distribution companies.

Question(s):

a) Please provide a single table showing London Hydro's insurance costs by policy (e.g., general liability, property, cyber security, etc.) for each year of the 2022-2027 period. As part of the response, please indicate which operational program the costs are recorded.

b) Please provide a more detailed description of the types of insurance coverage that the Company purchases.

c) Please explain the process that London Hydro undertook with respect to selecting its insurance provider(s). As part of the response, please provide details about the

RFP, the number of bidders, and the selection process. Please also advise when London Hydro most recently reviewed its insurance policy.

d) With respect to insurance claim-related payments, please:

   i. Please provide the actual total amount of insurance claim-related payments received in each year of the 2022-2025 period

   ii. Please explain how the actual insurance claim-related payments were recorded for regulatory accounting purposes (i.e., treated as capital contributions against certain asset classes, booked as other revenues, etc.)

   iii. Please provide the forecast total amount of insurance claim-related payments included as an offset to revenue requirement in each of 2026 and 2027.

   iv. Please explain how the Company estimated forecast insurance claim-related payments for 2026 and 2027.

   v. Please explain how the forecast insurance claim-related payments were recorded for regulatory accounting purposes (i.e., treated as capital contributions against certain asset classes, booked as other revenues, etc.). As part of the response, please reference where specifically in the evidence the insurance claim-related payments are recorded.

4-CCC-64
Ref: Exhibit 4, pp. 280-284
Exhibit 9, pp. 35-37

Question(s):

a) Please provide a table that shows the following for each year of the 2022-2027 period:

   i. Total number of locates

   ii. Total locate program costs

iii. Average cost per locate

iv. Third-party locate service provider costs

v. Third-party digital screening service costs

vi. Ontario One Call fees

vii. Internal labour costs (supervision and administration)

viii. Any other locate-related costs (including an explanation)

b) Please confirm that all locate-related costs are recorded in the Locate Services Program. If any locate-related costs are recorded in other programs, please identify the program and quantify the amount for each of the 2022-2027 period.

c) Please further explain how the Company estimated the 2026 and 2027 locate costs. As part of the response, please explain how the annual savings realized in each of 2024 and 2025 from the third-party screening service are reflected in the 2026 and 2027 locate cost forecasts.

d) Please provide a specific reference in London Hydro's 2022 cost of service proceeding that shows where the OEB-approved locate costs of approximately $1.1M is established.

e) Please explain how the locate costs approved in base rates for the April-December 2023 period was derived.

f) With respect to the April-December 2023 actual locate costs, please advise whether these costs are derived based on the known costs incurred over that period of time or reflect a percentage of the total annual 2023 locate costs.

g) With reference to the table requested in part (a), please advise which cost categories are included in the actual costs that form part of the calculation of the balance for recovery in the GOCA variance account.

4-CCC-65

Ref: Appendix 2-N
Exhibit 4, pp. 303,
Exhibit 4, Appendix 4-5 (LHI Management Services Agreement), Schedule A

Question(s):

a) In the context of the services that are planned to be provided by LHI to LHHI as listed in Appendix 4-5, please further explain how the cost recovery amount was estimated. As part of the response, please also identify the OM&A program budget where these amounts are included as an offset.

b) Please file the most recent SLA between the City of London and London Hydro for water billing services.

c) Please file the most recent independent reviews for water billing services (2024 study).

d) Please further explain how the $4.5M charge for water billing services was derived.

4-CCC-66

Ref: Exhibit 4, p. 314

Question(s):

Please explain the process that London Hydro undertook with respect to selecting the vendor for the Green Button Cost Allocation study. As part of the response, please provide details about the RFP, the number of bidders, and the selection process.

Exhibit 6 – Revenue Requirement

6-CCC-67

Ref: Appendix 2-H
Exhibit 6, pp. 32, 37

Question(s):

a) Please provide a breakdown of the Late Payment Charge revenues between electricity accounts and the City of London water billing accounts for each year of the 2022-2027 period. As part of the response, please also explain the methodology used to forecast each component of the Late Payment Charge revenues.

b) Please further explain the source of "administrative overhead charges" revenue and how the 2027 test year revenue amount of $0.6M was estimated.

c) Please explain the cost figure for "billable services" set out in Table 6-24.

d) Please provide a more detailed explanation, including any supporting calculations, of the derivation of the forecast 2027 bank deposit interest of $0.3M.

Exhibit 7 – Cost Allocation

7-CCC-68
Ref: Exhibit 7, pp. 6-7
Cost Allocation Model (Excel)

Preamble:

London Hydro has updated the weighting factors used to allocate service connection costs to reflect London Hydro's practice of customers paying for these costs directly in rate classes other than the residential rate class.

Question(s):

a) Please further explain the statement that customers in non-residential rate classes pay for service connection costs directly. As part of the response, please advise whether London Hydro's practice with respect to the payment of service connection costs has changed since its most recent rebasing application.

b) Please provide a table showing for each rate class:

i. The gross book value of service connection costs (account 1855)

ii. The capital contributions received with respect to service connection costs

iii. The net service connection costs funded by London Hydro

Exhibit 9 – Deferral and Variance Accounts

9-CCC-69
Ref: Exhibit 9, p. 39

Question(s):

a) Please provide the LEAP EFA costs in base rates as escalated by inflation minus productivity/stretch for the period 2022-2026.

b) Please recalculate the balance in the LEAP EFA account using the escalated LEAP EFA base rate amounts calculated in part (a).

9-CCC-70
Ref: Exhibit 9, p. 44

Question(s):

a) Please provide the 2020 actual and deemed ROE.

b) Please confirm that the waived late payment charges are related only to electricity accounts (and exclude any late payment charges waived related to City of London water accounts (if applicable)).