

## London Hydro Cost of Service Application

EB-2021-0041

### Chippewas of Kettle and Stony Point First Nation (CKSPFN) / Southwind Corporate Development Inc. (Southwind) Interrogatories

November 5, 2021

#### CKSPFN/Southwind – 1

Ref: Exhibit 1

London Hydro is owned by the City of London. The City of London employs an Indigenous Community Liaison Officer, and is seeking to fulfill its commitment to the Truth & Reconciliation Commission's Calls to Action by working with local Indigenous peoples to establish a Truth and Reconciliation Commission – Calls to Action (TRC) accountability and implementation body and plan. This includes developing an audit and evaluation process to measure the progress towards the TRC's Calls to Action recommendations. In direct relation to London Hydro, the City of London's TRC accountability and implementation body and plan includes providing opportunities for on-reserve economic development through strategic and innovative partnerships with the City and the private sector (reference: <https://london.ca/CDIS>).

1a) Please provide London Hydro's Indigenous relations policies, including any procurement policies referencing Indigenous-owned vendors, and if there are no standing policies please advise how London Hydro intends to develop such policies and how First Nations will be involved in helping create such policies.

1b) Please advise how London Hydro ' intends to implement economic reconciliation and Indigenous engagement in capital projects, and in particular in its procurement.

1c) If available, please provide evidence of London Hydro's approaches to consultation and economic reconciliation with Indigenous groups impacted by decisions for capital projects in the last ten years.

#### CKSPFN/Southwind – 2

Ref: Exhibit 1 Page 112

On September 30, 2020, the MENDM directed the IESO to implement a 2021-2024 Customer Demand Management (CDM) Framework launching January 1, 2021. The new framework will be centrally delivered by the IESO under the Save on Energy brand

and will include incentive programs targeted to those who need them most, including opportunities for commercial, industrial, institutional, on-reserve First Nations, and income-eligible electricity consumers. The implications of this new framework have not been contemplated in London Hydro's Application or the load forecast.

2a) Please explain how London Hydro will advance the CDM Framework.

2b) Please provide London Hydro's estimation of how the CDM Framework will impact the load forecast.

2c) Please explain how income-eligible electricity consumers, and specifically First Nation members of this consumer group for London Hydro, will be able to take advantage of the CDM incentive programs.

### **CKSPFN/Southwind – 3**

**Ref: Exhibit 1 Page 117**

Addressing aging infrastructure is the main driver of spending in the Capital Plan – Distribution System Plan (DSP). Replacement of end-of-life primary underground cables accounts for approximately 43%. Upgrades to the infrastructure (civil and electrical) supplying the downtown core account for 11%. The remaining work addresses components such as wood poles, insulators and switching enclosures that are at end-of-life and pose safety and reliability risks. The proposed work will include a significant amount of soil disturbance, and numerous environmental and planning approvals.

3a) Please provide London Hydro's policies and approaches for addressing requirements for the duty to consult, and where appropriate, accommodate First Nation Aboriginal and treaty rights.

3b) Please provide London Hydro's policies and approaches for addressing requirements for archaeological assessments and engaging with First Nations with regard to those assessments.