

**HYDRO ONE LIMITED  
RESPONSE TO REQUEST FOR INFORMATION**

JURISDICTION:	WASHINGTON	DATE PREPARED:	9/17/2018
CASE NO.:	U-170970	WITNESS:	James Scarlett
REQUESTER:	TEP	RESPONDER:	Adele Pantusa
TYPE:	Data Request	DEPT:	Law
REQUEST NO.:	TEP – 043(H1)	TELEPHONE:	416-345-6310
		EMAIL:	apantusa@hydroone.com

**REQUEST:**

**RE: Supplemental Testimony of James D. Scarlett, Exh. JDS-1T at 23:14-15.**

Mr. Scarlett testifies that “Hydro One is bound by these contractual obligations.”

- a. Please confirm that this statement refers to the 81 Stipulated Commitments and any conditions included by the Commission.
- b. Please identify the documents constituting the contract, and the parties to the contract.
- c. Please identify the remedies available to the Commission for any breach of the terms of the contract, and the fora in which the Commission is authorized to seek enforcement of the contract.

**RESPONSE:**

- a. Yes this statement refers to the 81 Stipulated Commitments and any conditions included by the Commission.
- b. The documents constituting the contract is the all-parties, all-issues settlement agreement in the merger proceeding (the “Settlement Agreement”) before the Washington Utilities and Transportation Commission (the "Commission") filed on March 27, 2018. The parties to this Settlement Agreement are: Avista, Hydro One, Commission Staff, the Public Counsel Unit of the Washington Office of Attorney General, The Energy Project, NW Energy Coalition, Renewable Northwest, Natural Resources Defense Council, Sierra Club, the Washington and Northern Idaho District Council of Laborers, the Northwest Industrial Gas Users and the Industrial Customers of Northwest Utilities.
- c. Please refer to Commitment Numbers 30 and 31 for the remedies available to the Commission for any breach of the terms of the contract.