

November 3, 2017

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
P.O. Box 2319
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

Re: EB-2017-0024 - Alectra Utilities Inc. – 2018 Rates – Issues List

The Consumers Council of Canada (“Council”) is an intervenor in the above-referenced proceeding. On October 18, 2017, the Ontario Energy Board (“OEB”) Staff advised the OEB that parties to the proceeding had been unable to reach an agreement on a draft Issues List. OEB Staff filed a draft Issues List that included proposed changes and comments from some of the intervenors and Alectra Utilities Inc. (“Alectra”). In its Procedural Order No. 2, the Ontario Energy Board (“OEB”) established a revised draft Issues list for the purposes of the Settlement Conference. The OEB also indicated that in the absence of an agreement on a draft Issues List parties would be free to make submissions on the OEB’s revised Issues List. These are the comments of the Council.

The Council agrees that the revised draft Issues List established by the OEB in its Procedural Order No. 2 captures what we believe to be the issues relevant to the proceeding. There is one point we wish to make.

In its evidence Alectra states:

As part of the amalgamation of PowerStream, Horizon utilities and Enersource, PowerStream was identified as the “acquirer”, under the International Financial Reporting Standards (“IFRS”) business combination standard. IFRS requires that all entities in the new organization adopt the acquirer’s policy. Consequently, Alectra Utilities has adopted PowerStream’s capitalization policy for Horizon Utilities and Enersource RZs¹

The impact of this change on Horizon Utilities Corporation’s (“Horizon’s”) OM&A amounts to over \$6 million per year.² Like other parties to this proceeding we believe that an important consideration for the OEB with respect to the Application is how to account for the change in the capitalization policy. We urge the OEB to accept this as an appropriate issue for this proceeding.

Yours truly,

Julie E. Girvan

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¹ Ex. HRZ-SEC-6

² Ex. HRZ-SEC-6

