

November 10, 2017

RESS, EMAIL & COURIER

Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

Attention: Ms. K. Walli, Board Secretary

Dear Ms. Walli:

**Re: Alectra Utilities – Application for Distribution Rates and Other Charges
Effective January 1, 2018 (EB-2017-0024) – Issues for Oral/Written Hearing**

We are counsel to the applicant, Alectra Utilities Corporation (“Alectra”), in the above-noted proceeding. Pursuant to the Board’s Procedural Order No. 1 (re-issued September 15, 2017), and further to Alectra’s November 3 letter informing the Board that no settlement was reached by Alectra and parties during the Settlement Conference, these are Alectra’s submissions regarding the form of hearing.

In Alectra’s submission view, an oral hearing may be warranted only in respect of certain issues relating to the Incremental Capital Model (*i.e.*, Issues 2.2, 2.3, 2.5).

All other issues (*i.e.*, Issues 1.1, 1.2, 2.1, 2.4, 3.1) should be dealt with by way of a written hearing. This is because, as Alectra submitted in its August 29, 2017 letter to the Board, the nature of each rate request in this application is relatively straightforward and well-understood by the Board and parties. Specifically, each request has been made pursuant to an established, Board-approved, rate making framework (*i.e.* Price Cap IR for the Brampton, Enersource and PowerStream rate zones, and Custom IR for the Horizon rate zone).

In this respect, as the Board’s *Filing Requirements for Incentive Rate-Setting Applications* indicate:

- “the IRM application process is intended to be mechanistic in nature”¹,
- the Board has routinely “taken steps to streamline the process even further”²; and,

¹ Chapter 3 Filing Requirements, p. 24.

² Chapter 3 Filing Requirements, p. 4: “For 2018 IRM applications, the OEB has once again taken steps to streamline the process further by pre-populating additional data in its models with distributor-specific

- “The models and workforms issued by the OEB are provided to assist the applicant in filing a rate application, and to provide consistent formatting for all distributors for greater efficiency of the review process.”³

Accordingly, other than the aforementioned ICM-related issues which may require further examination in an oral process, all other issues should proceed by way of written hearing. It would be neither efficient nor in keeping with the nature of this application to elevate non-ICM related issues to an oral hearing.

Yours truly,



Crawford Smith

cc: Indy Butany-DeSouza, Alectra Utilities
Charles Keizer, Torys LLP

RRR data, and incorporated more automation with respect to the calculation of Global Adjustment (GA) and Capacity Based Recovery (CBR) charges and rate riders.”

³ Chapter 3 Filing Requirements, p. 5.