



PUBLIC INTEREST ADVOCACY CENTRE  
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November 10, 2017

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

**VIA RESS & E-MAIL**

Dear Ms. Walli,

**Re: OEB File No. EB-2017-0024  
Alectra Utilities Corporation – Application for electricity distribution  
rates and other charges beginning January 1, 2018  
VECC Submission on Oral Issues**

In accordance with Revised Procedural Order No. 1, and in the absence of a settlement proposal, as noted by Alectra Utilities Corporation (Alectra) in its November 3 letter, the Vulnerable Energy Consumers Coalition (VECC) is pleased to provide the Board with our comments on additional process in this proceeding.

With respect to an oral hearing, it is VECC's view that the issues which should be examined in an oral hearing include:

1. Alectra's Incremental Capital Modules regarding the Brampton, PowerStream and Enersource rate zones, including Enersource's Distribution System Plan (issues 2.2 to 2.5); and
2. The additional issue raised by VECC and other intervenors regarding the capitalization change to Horizon Utilities' Earnings Sharing Mechanism (issue 1.1, or as otherwise decided by the Board).

In VECC's view, an oral hearing is warranted for the issues identified above. In particular, due to the unusual nature of ICM funding requests related to three recently amalgamated rate zones, VECC submits that it would be appropriate to allow all parties to examine and

address these issues at an oral hearing. We agree with AMPCO that an oral hearing would also be appropriate to examine Enersource's first 5-year DSP, particularly as it relates to its ICM request. With respect to issue 1.1, it is VECC's view that, as noted by parties in their November 3 submissions, the implications of Alectra's capitalization change remain unclear and an oral hearing on this matter (even if less expansive) would likely benefit all parties.

Furthermore, as raised in VECC's November 3 letter, we submit that additional process to clarify interrogatories and more technical issues which arise in Alectra's application would expedite any future process in this proceeding. While noting that Alectra has recently filed responses to certain questions raised at the ADR, VECC believes that a technical conference prior to an oral hearing would be useful to efficiently clarify responses to the interrogatories and other evidence. Where the Board determines that an oral hearing with respect to the issues identified above is not necessary, a technical conference would be all the more appropriate in this case.

Yours truly,

A handwritten signature in black ink, appearing to read "Alysia Lau". The signature is fluid and cursive, with the first name being more prominent.

Alysia Lau  
Barrister & Solicitor | Counsel to VECC  
c/o Public Interest Advocacy Centre

**cc:** Indy J. Butany-DeSouza, Vice President Regulator Affairs, Alectra Utilities Corporation - [indy.butany@alecrautilities.com](mailto:indy.butany@alecrautilities.com);  
Parties to EB-2017-0024

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