



November 10, 2017

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

Re: Alectra Utilities Inc. 2018 Electricity Distribution Rate Application  
AMPCO Comments on the Hearing Process  
Board File No. EB-2017-0024

Dear Ms. Walli:

Procedural Order No. 1 (re-issued September 24, 2017) indicates that if there was no settlement proposal arising from the Settlement Conference, parties were to provide any submissions on which issues should be heard in writing and which issues should be heard orally. Alectra filed a letter November 3, 2017 indicating that there was no settlement proposal arising from the Settlement Conference. Accordingly, AMPCO provides the following submissions.

AMPCO submits that all issues on the revised draft issues list related to the Incremental Capital Modules (ICM) filed for the Brampton, Enersource and PowerStream rate zones (issues 2.2 to 2.5) should be heard orally. This is the first time since the merger that Alectra has asked for an ICM for three out of four rate zones. This is the first application where Enersource has filed a completed 5-year Distribution System Plan. AMPCO agrees with Board Staff that the process could benefit from further testing of the ICM requests given the extent and scope of the proposals.

On November 3, 2017, AMPCO made submissions on the Draft Issues List that included a request to add a new issue to consider the impact of the change in Alectra's capitalization policy. AMPCO submits that if the Board agrees to add this issue to the issues list, or determines it is already contained within an existing issue, AMPCO submits that issue should be heard orally in order for the parties to fully understand the implications now and moving forward.

AMPCO further submits that if the Board determines that all issues can be heard in writing, the process would benefit from a Technical Conference to further clarify interrogatory responses and responses to subsequent questions.

Please do not hesitate to contact me if you have any questions or require further information.

**Association of Major Power Consumers in Ontario**

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Sincerely yours,

*(ORIGINAL SIGNED BY)*

Colin Anderson  
President, Association of Major Power Consumers in Ontario

Copy to: Alectra Utilities Inc.