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Reply To: Thomas Brett
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Our File No. 174515

VIA RESS, EMAIL AND COURIER

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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Attention: Kirsten Walli,
Board Secretary

Dear Ms. Walli:

Re: EB-2017-0024: Alectra Utilities Corporation, 2018 EDR Application

BOMA is writing pursuant to Procedural Order No. 1, issued on September 8, 2017 (corrected and Re-Issued September 15, 2017), which stated that if there were no settlement proposal arising from the Settlement Conference, parties were to file and serve on the other parties by November 10, 2017, any submissions on which issues should be heard in writing, and for which issues the Board should hold an oral hearing.

BOMA is of the view that Issues 2.2 to 2.5, which deal with the Incremental Capital Modules ("ICM"), filed for the Brampton, Enersource, and PowerStream rate zones, given the magnitude of the proposals, the fact that in the case of Enersource, we are dealing with the initial Distribution System Plan should be dealt with in an oral hearing. BOMA agrees with Board Staff that the process could benefit from further testing of the three ICM requests.


BOMA also agrees with Board Staff that the capitalization policy would benefit from oral evidence and cross-examinations. Cross-examination would likely shed more light on the proper characterization of the proposed changes in capitalization. Moreover, the amounts of money at stake could be substantial; in the order of \$6 million for each year prior to the next rebasing.

BOMA is of the view that if the Board decides on an oral hearing for the two issues discussed above, a Technical Conference is probably not necessary. However, BOMA would not object to the addition of a one-day Technical Conference.

BOMA makes no submission on whether the Hamilton Street Lighting cost allocation should be included in an oral hearing.

Yours sincerely,

FOGLER, RUBINOFF LLP



Thomas Brett

TB/dd

cc: All Parties (*via email*)