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December 19, 2018

Ms Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Walli,

**RE: EB-2018-0130 Hydro One Networks 2019 Transmission Rates Application
Energy Probe Intervenor Request Letter**

Energy Probe Research Foundation (Energy Probe) applies for intervenor status in the EB-2018-0130 proceeding, the application by Hydro One Networks Inc. to the Ontario Energy Board for an order or orders for approval of transmission rates and other charges beginning January 1, 2019.

Statement of Interest

Energy Probe is a non-profit environmental and consumer organization which promotes economic efficiency in the use of resources. Energy Probe will be representing its electricity residential customer supporters in Ontario, which we have some number of thousands, and will also be representing a broader concern with respect to the overall financial health and operational integrity of Ontario utilities.

Energy Probe will focus on the following parts of the application:

- proposed recovery of the 2019 revenue requirement,
- proposed disposal of regulatory assets,
- and the proposed use of the Inflation Factor and the Productivity Factor to be established in the current EB-2018-0218 Hydro One Sault Ste. Marie proceeding

Energy Probe is an active participant in the EB-2018-0218 proceeding with a particular interest in the Inflation Factor and Productivity Factor evidence.

Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

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Hearing

Now that the OEB has decided to proceed by means of a written hearing in the EB-2018-0218 proceeding, Energy probe is concerned that Inflation Factor and Productivity Factor evidence, that may have a significant impact on transmission rates in 2019 and subsequent years, may not be tested in an oral hearing. Considering the scope of the application and its impact on customers of the Hydro One transmission system, Energy Probe believes that an oral hearing would be appropriate unless a settlement is reached on all issues.

Costs

Energy Probe is a non-profit organization which relies on individual donations to help protect the public interest. Without the prospect of an award of costs, Energy Probe's ability to participate in proceedings would be very limited. Energy Probe intends to seek a cost award in this proceeding, and expects to intervene responsibly, cognizant of the Board's guidelines regarding cost awards.

Communications

Communications relating to this Intervenor Request Letter, including but not limited to all documents filed with the Board by the applicant and required by Energy Probe, should be directed to consultants:

Tom Ladanyi TL Energy Regulatory Consultants Inc. 41 Divadale Drive Toronto ON M4G 2N7 Tel: 416 423-3685 tom.ladanyi@rogers.com	Roger Higgin SPA Inc. 15 Malabar Place Don Mills, Toronto Ontario M3B 1A4 416-391-0738 spainc@rogers.com	Lawrence Schwartz Consulting Economist 82 Ridge Hill Drive Toronto, ON M6C 2J8 416-785-4985 lschwartz5205@rogers.com
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Respectfully submitted on behalf of Energy Probe.

Original signed by

Tom Ladanyi
Consultant to Energy Probe

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