



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

4 November 2019

VIA E-MAIL

Ms. Christiane E. Long
Registrar and Board
Secretary
Ontario Energy Board
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Long:

**Re: Hydro One Networks Inc. and Orillia Power Distribution Corporation
Application under sections 86(2)(b), 86(1)(a), 78, 18, 77(5), and 74 of the *Ontario Energy Board Act, 1998* for the relief necessary to effect Hydro One Networks Inc.'s purchase of all issued and outstanding shares of Orillia Power Distribution Corporation.
Submissions of VECC on Need for Oral Hearing
Ontario Energy Board File Number: EB-2018-0270**

Please find enclosed the submissions of the Vulnerable Energy Consumers Coalition (VECC) on the Board's Call for Comments on the Need for an Oral hearing in EB-2018-0270 – HONI/OPDC MAAD Application.

Yours truly,

John Lawford

Counsel for VECC

cc: Applicants and interested parties (by email)

ONTARIO ENERGY BOARD

IN THE MATTER OF an application made by Hydro One Inc. for leave to purchase all of the issued and outstanding shares of Orillia Power Distribution Corporation, made pursuant to section 86(2)(b) of the Ontario Energy Board Act, 1998.

AND IN THE MATTER OF an application made by Orillia Power Distribution Corporation seeking to include a rate rider in the current Board- approved rate schedules of Orillia Power Distribution Corporation to give effect to a 1% reduction relative to their Base Distribution Delivery Rates (exclusive of rate riders), made pursuant to section 78 of the Ontario Energy Board Act, 1998.

AND IN THE MATTER OF an application made by Orillia Power Distribution Corporation for leave to transfer its distribution system to Hydro One Networks Inc., made pursuant to section 86(1)(a) of the Ontario Energy Board Act, 1998.

AND IN THE MATTER OF an application made by Orillia Power Distribution Corporation seeking cancellation of its distribution licence, made pursuant to section 77(5) of the Ontario Energy Board Act, 1998.

AND IN THE MATTER OF an application made by Hydro One Networks Inc. seeking an order to amend its distribution licence, made pursuant to section 74 of the Ontario Energy Board Act, 1998, to serve the customers of the former Orillia Power Distribution Corporation.

AND IN THE MATTER OF an application made by Orillia Power Distribution Corporation for leave to transfer its rate order to Hydro One Networks Inc., made pursuant to section 18 of the Ontario Energy Board Act, 1998.

AND IN THE MATTER OF an application made by Hydro One Networks Inc., seeking an order to amend the Specific Service Charges in Orillia Power Distribution Corporation's transferred rate order made pursuant to section 78 of the Ontario Energy Board Act.

OVERVIEW

1. This application should be heard by way of an oral hearing. We have been provided with the submissions of Schools Energy Coalition on this question and we agree with and adopt every point made in their submission. We add only the following thoughts and confirm that VECC will participate in any oral hearing.
2. The scope of such a hearing should not be defined or limited by the Board and its scope should be defined by the questioning of the parties, guided by rulings of the hearing Panel, provided such questioning is relevant to this application. As noted by SEC, this is the rare case in which “the way to a shorter and more efficient hearing is to allow all relevant areas to be explored”. This is due to the nature of the questions in issue, and the Applicants’ level of disclosure on these issues thus far, which has been less than forthcoming, meaning key evidence is not, in fact, on the record.
3. An oral hearing also is required because the Applicants are relying on expert evidence, and without an oral hearing the parties will not have an opportunity to cross-examine on that evidence, which is clearly being offered for its probative value, without the ability to examine its relevancy or reliability.
4. VECC therefore supports a full oral hearing of these Applications.

DATED AT OTTAWA, 4 NOVEMBER 2019