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November 4, 2019

**DELIVERED BY RESS and EMAIL**

Ms. Kirsten Walli, Board Secretary  
**Ontario Energy Board**  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, Ontario M4P 1E4

Dear Ms. Walli:

**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**

**Submission regarding Oral Hearing**

**EB-2018-0270**

We write in response to the Ontario Energy Board's letter dated October 28, 2019 requesting submissions from the parties as to whether or not an oral hearing is required.

Orillia Power Distribution Corporation ("Orillia Power") submits that an oral hearing of this matter is not required and that the Board can make a determination of the issues based on the evidence filed to date and the written submissions of the parties and the interveners, which would be forthcoming.

There has already been substantial evidence filed to date in this proceeding that has been subject to probing and cross-examinations by OEB Staff and the interveners:

- The parties and the interveners made written interrogatories of the Applicants arising from that evidence. Each of the OEB Staff, the Consumers Council of Canada, Energy Probe, the School Energy Coalition, the Power Workers' Union, and the Vulnerable Energy Coalition of Consumers provided an extensive list of interrogatories.
- The Applicants provided responses to these interrogatories.

- A two day technical conference was held on October 3 and October 4, 2019 where each of the interveners and OEB Staff had the opportunity to seek further clarification from the Applicants. A transcript is available of that technical conference.
- Undertakings were made at the technical conference. Hydro One Networks Inc. and Orillia Power have provided responses to those undertakings.

In Orillia Power's submission, an oral hearing would only be duplicative of the issues that have already been thoroughly canvassed in the evidence. This is not a situation where an oral hearing would be of assistance to the OEB because of issues of credibility or where the OEB would need to have the benefit of hearing expert evidence *viva voce*.

For the above reasons, we request that the matter proceed to the filing of written submissions.

In the event the OEB chooses to proceed directly to submissions in this matter, Orillia Power suggests the following schedule:

- HONI and Orillia Power's argument-in-chief - November 22, 2019,
- Intervenor and OEB Staff submission - December 6, 2019, and
- HONI and Orillia Power's reply submissions - December 20, 2019.

Yours truly,

**BORDEN LADNER GERVAIS LLP**



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