

April 06 2009

Electronically & by same day courier

Ms. Kirsten Walli, Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2701
Toronto, On M4P1E4

Dear Ms. Walli

Re: OEB file EB-2008-0187

The following constitutes the closing submissions of the Society of Energy Professionals in the above matter.

The Society of Energy Professionals

The Society represents approximately 1100 engineers and other professional, administrative and supervisory employees at Hydro One.

Society members have professional careers inextricably linked to Hydro One. They are engaged in every aspect of the affairs of the company. Their collective and individual sense of professional pride and accomplishment is intimately tied to the success of their employer in serving the public.

Acting as their bargaining agent however, the Society is in a position of independence which permits the expression of disagreement with Hydro One on any issue. Society members have particular expertise on virtually any subject which could be raised in proceedings such as this one.

In the years to come the Society expects to participate more fully in Board hearings than it has done in the past. It is the present intention of the Society to do so in a measured selective manner which it hopes will bring value to the Board and through the Board to the public.

The Society does not regard itself as a single interest intervener-whether or not in any individual case its participation is focused

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THE SOCIETY
OF ENERGY PROFESSIONALS
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ONTARIO ENERGY BOARD
OFFICE OF THE BOARD SECRETARY

Without prejudice –early filing requirement April 06 09

A representative of the Society was unable to attend the last hearing date of March 27 09. On that day the Panel decided to require the Society and the PWU to file written arguments prior to the other interveners. They did so at the prompting of Mr. Shepherd. The Society wishes to express its objection to this ruling and submits this argument earlier than others without prejudice.

The current application

The Society supports the increases requested by Hydro One in this application.

The application is submitted at a time of unprecedented change in the industry. The government of Ontario through other initiatives is requiring the company to position itself for significant new initiatives. Reducing the requested rate increase would result in important work being shunted to a later time. The consequences would mean that aging assets and end of life equipment would remain in service. That could introduce safety and reliability issues.

Those of us who live in the city of Toronto will be aware of the Public outcry that occurred in the fall of 2008 and early this winter when dogs were being electrocuted as a result of aging hand wells on city streets. Toronto Hydro was slow to respond and several incidents were reported before an expensive audit was conducted and corrective action taken.

Wooden pole replacement programs along with strategic spare transformer availability are critical to safety and reliability and we should not expose employees and the public to potential safety hazards by deferring necessary work. Shifting work programs to 2010 will simply result in congested planning and work execution, resulting in greater costs. As it is, the ability to attract the appropriate Labour skills are increasingly difficult and will only get worse as the Green Energy Act imposes added requirements to Hydro One. Putting off what needs to get today serves no ones purpose.

The third generation IRM

Throughout this process some interveners have attempted make an issue over Hydro Ones use of the capital adjustment mechanism. By suggesting that the company has not met the filing guidelines of the Board some hope to put off the matter to a later date. The Society submits that the company has met the test and provided the required information needed to decide the matter.

This application is the first, in that the capital adjustment mechanism is being reviewed in conjunction with the third generation IRM. Even if the Board were conclude that the request was less than perfect, The Society believes it would be imprudent to rule against the application on a mere technicality. We do not think that the public interest would be served by delaying the work described and putting it off to a future hearing. If the Board has concerns about the process it can articulate and clarify its position in the decision for future reference.

Respectfully submitted,

Yours truly

A handwritten signature in black ink, appearing to read 'R Long', written in a cursive style.

Richard Long