



VIA RESS AND COURIER

September 15, 2009

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: Hydro One Networks Inc. – Application for an Electricity Distribution Rate Change
AMPCO's Comments on the Draft Issues List
Board File No. EB-2009-0096

I am writing to provide comments on the Draft Issues List for the Board's consideration as per Procedural Order No. 1 dated September 9, 2009.

AMPCO has reviewed the Draft Issues List in consultation with other Intervenor. There are a couple of issues noted below that AMPCO submits should be added to complete the Issues List.

2. LOAD and REVENUE FORECAST

In Hydro One's 2008 Distribution Rate Case, EB-2007-0681, there was a separate issue No. 5 for Revenue Requirement that included Issue 5.1 - Is the calculation of the proposed revenue requirement for 2008 appropriate? In the current application (EB-2009-0096), revenue issues have been included under Issue No. 2 (Load and Revenue Forecast) and this specific issue related to revenue requirement is not included. AMPCO submits that this could be addressed by revising Issue 2.2 as follows:

- 2.2 Is the proposed amount and calculation for 2010/2011 revenue requirement and external revenues, including the methodology used to cost and price these services, appropriate?

8. SMART METERS

The Draft Issues List addresses metering for customers eligible for a smart meter. However, metering issues for non-residential customers is not included on the issues list. AMPCO submits that an additional issue, Issue 8.5 be added with the following wording:

- 8.5 Are Hydro One's plans and treatment of costs for metering of non-residential customers appropriate?

If the additional issue is accepted, perhaps the heading for Issue 8 should be revised to Metering.

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General Comments on Issues List

The Final Issues List should reference exhibit numbers from Hydro One's evidence. AMPCO submits that all issues on the issues list should be subject to an oral hearing to allow for a full discussion of the issues.

Intent to File Evidence

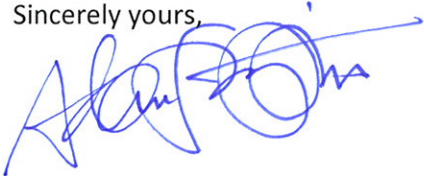
Until the interrogatory phase on Hydro One's evidence is complete and AMPCO has had an opportunity to review Hydro One's responses, AMPCO is not in a position to advise the Board if AMPCO plans to submit evidence.

Delayed Filing of Evidence

AMPCO agrees with Energy Probe that parties should be allowed adequate time to review and submit interrogatories on Hydro One's outstanding evidence related to CDM impacts and vegetation management.

Please contact me if you have any questions or require any additional information.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'Adam White', with a stylized flourish extending from the end.

Adam White

Copy to: Hydro One Networks Inc.