

August 15, 2012

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File 10606.000052

Kirsten Walli
Board Secretary
Ontario Energy Board
Suite 2701
2300 Yonge Street
Toronto ON M4P 1E4

Dear Ms Walli:

**Re: EB-2012-0136/Hydro One Networks Inc. ("HONI")/
2013 Distribution Rates Application**

We are counsel to the Consumers Council of Canada in this matter. What follows are our client's comments on the draft issues list, delivered pursuant to Procedural Order No. 1.

We propose the following additions to the draft issues list. The first issue, under section 2, should be the following:

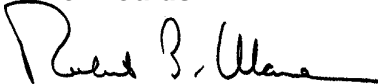
1. Has HONI appropriately applied the OEB's ICM?
2. Following what is now issue 2.1, the following issue should be added:

Is the proposed treatment of individual capital projects appropriate?
3. An additional section should be added to the issues list, addressing the question of whether the proposed rates are appropriate.

We have reviewed HONI's proposed schedule for the proceeding, set out in its letter to you of August 14, 2012. We agree with the proposed schedule, with one qualification. We suggest that the time between the delivery of HONI's response to interrogatories and the time for the filing of intervenor evidence be enlarged.

Yours very truly,

WeirFoulds LLP



Robert B. Warren

cc: Julie Girvan
HONI Attention: Susan Frank
All parties
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