

February 20, 2013

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

*Via web portal and by courier*

Dear Board Secretary:

**Re: Regional Infrastructure Planning – Working Group Draft Report to the Board –  
File No: EB-2011-0043**

The Electricity Distributors Association (EDA) is the voice of Ontario's local distribution companies (LDCs). The EDA represents the interests of 75 publicly and privately owned LDCs in Ontario.

The EDA has consulted with its members on the Working Group's Draft Report to the Board on Regional Infrastructure Planning, and would like to provide the following comments for consideration.

1. The EDA believes that the regional infrastructure planning process needs to have a predefined approach for conflict resolution. The goal is to determine the least cost solution in a regional plan but because there may be other tradeoffs which cannot be easily quantified, such as community acceptance, timing of projects and other criteria as well, there may be differences in opinion on the best overall solution. Although the aim would be to achieve consensus among all parties (i.e., LDCs, OPA, and Transmitters) involved in completing the 'Regional Infrastructure Plan', there should be a defined process for resolving differences when there is a disagreement between the main parties.
2. The stakeholdering plan in the 'Regional Infrastructure Planning Process' should also have a time schedule developed for obtaining feedback on the draft regional plan. Then the stakeholdering plan should be implemented as per the agreed upon time schedule.
3. Further, it is proposed that the new requirements for the regional infrastructure planning when finalized, should be presented to distributors through regional meetings. OPA and Hydro One (or other transmitters) should provide an overview of the process for regional planning and the OEB staff should provide the details on new filing requirements and proposed code requirements on regional planning.

4. In addition, the OPA and transmitters, being the lead on the regional infrastructure planning, should be prepared to respond to interrogatories that may arise with respect to the finalized regional infrastructure plan during distributors' rate application hearings at the OEB.
5. Regional infrastructure planning may require distributors to provide their share of the capital investment in the regional plan during the intervening period of the distributors' cost of service applications. Therefore, the OEB should consider revising the filing requirements for an incremental capital module to provide for investments made by distributors as part of a regional plan. The revisions to filing requirements might include a determination that investments made in accordance with a regional plan are deemed to be prudent and are clearly non-discretionary. The OEB should also consider whether there should be a different materiality level for capital investments made in accordance with a regional plan since a distributor should not be forced to defer required investments in its own distribution system in order to accommodate regional needs.

The EDA looks forward to working with the Board staff and the Working Group to provide any clarifications that may be necessary.

Yours truly,

A handwritten signature in cursive script, appearing to read "Maurice Tucci".

Maurice Tucci  
Director, Regulatory and Technical Policy