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BY EMAIL and RESS

October 21, 2014
Our File No. 20140213

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2014-0213 – Hydro One Woodstock MAADs

We are counsel for the School Energy Coalition. Further to Procedural Order #2 in this matter, SEC hereby requests that this matter be heard by way of oral hearing.

SEC makes this request for four reasons:

- The Application is relatively sparse, so the initial base of evidence on which the Board can make a determination is limited.
- The responses to interrogatories are also surprisingly brief. There are many places in which the Applicants have refused to answer, and there are even more where the answers provide limited or partial information. Even a cursory review of the interrogatory responses shows that they do not provide a sufficient basis for the Board to render a decision. In a previous case, SEC moved for better answers, but that proved time-consuming and resource intensive. In this proceeding, it would appear to us that those responses can most efficiently be considered through cross-examination, with the Board present to guide the parties in the scope of both questions and answers.
- There are a number of specific issues on which further information is clearly necessary to supplement the interrogatory responses (even ones that have been answered in full). One example is the return on equity. The issue of whether the acquiror should be allowed to appropriate the ratepayer benefit arising out of the previous IRM would



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benefit from further information elicited through cross-examination. There are several other issues of this nature.

- For more than 15,000 customers in Woodstock, an oral hearing before this Board would be their one opportunity to ask the parties to the transaction, in public, to justify the transaction and demonstrate that it will not harm the ratepayers.

The Board will be aware that, in the acquisition of Norfolk Power by Hydro One, SEC expressed concern in our final submissions about the lack of an oral hearing in that proceeding, saying:

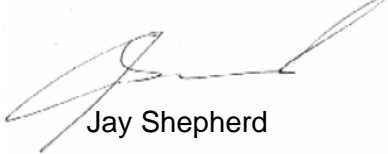
"In our view, this issue would have benefited from oral evidence from the Applicants, including the ability for ratepayers to cross-examine, and the Board to get to the bottom of what actually is going to happen to these ratepayers. SEC believes that the ability of the ratepayers to protect themselves in this proceeding may have been compromised by the failure to hold an oral hearing."

We would have the same concerns in this proceeding, if the ratepayers do not have an opportunity to find out more about their eventual fate through cross-examination.

All of which is respectfully submitted.

Yours very truly,

JAY SHEPHERD P. C.



Jay Shepherd

cc: Wayne McNally, SEC (email)
Interested Parties