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January 6, 2015

BY FAX & BY COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St, Suite 2701
Toronto ON M4P 1E4

Dear Ms. Walli:

Board File No. EB-2014-0083
Hydro One Brampton Networks Inc. --- 2015 Cost of Service
Energy Probe – Comments Draft Rate Order

Pursuant to the Decision and Order, issued on December 18, 2014, please find attached the Comments of Energy Probe Research Foundation (Energy Probe) in respect of the Draft Rate Order in the EB-2014-0083 proceeding.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh
Case Manager

cc. Scott Miller, Hydro One Brampton Networks (By email)
Paul Tremblay, Hydro One Brampton Networks (By email)
Michael Engelberg, Hydro One Networks (By email)
Randy Aiken, Aiken & Associates (By email)
Parties of Interest (By email)

Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

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Ontario Energy Board

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c. 15, (Schedule B);

AND IN THE MATTER OF an application by Hydro One
Brampton Networks Inc. for an order approving just and
reasonable rates and other charges for electricity distribution to
be effective January 1, 2015.

**COMMENTS ON DRAFT RATE ORDER OF
ENERGY PROBE RESEARCH FOUNDATION
("ENERGY PROBE")**

January 6, 2015

**HYDRO ONE BRAMPTON NETWORKS INC.
2015 RATES REBASING CASE
EB-2014-0083**

**ENERGY PROBE RESEARCH FOUNDATION
COMMENTS ON DRAFT RATE ORDER**

The following are the comments of Energy Probe Research Foundation ("Energy Probe") on the Draft Rate Order ("DRO") dated December 23, 2014 filed by Hydro One Brampton Networks Inc. ("HOBNI").

a) Revenue Requirement

Energy Probe has reviewed the draft rate order and believes that both the service revenue requirement and the base revenue requirement appropriately reflects the approved Settlement Proposal that was filed on October 9, 2014, and the update for the cost of capital parameters issued by the Board on November 20, 2014. In addition, Energy Probe submits that the update to the cost of power, based on the Board's Regulated Price Plan Report for November 1, 2014 to October 31, 2015 that was issued on October 16, 2014 has been accurately and appropriately calculated.

b) Cost Allocation and Rate Design

Energy Probe has also reviewed the allocation of costs and the rate design and believes they are in accordance with the approved Settlement Proposal.

c) Board Order

In the Decision and Order dated December 18, 2014, the Board ordered HOBNI to file with the Board and the intervenors a DRO reflecting the Board's findings.

In section 4 of the DRO, (pages 9 through 13 of 42), HOBNI lays out in detail a list of the specific approvals granted by the Board along with a reference for each.

Energy Probe notes, however, that there does not appear to be any mention in the DRO of the Board's order to HOBNI to file a working capital allowance study undertaken by a third party with the Board at its next cost of service application. Energy Probe believes that this order from the Board should be included in the DRO to ensure a complete reflection of the Board's findings in this matter.

d) Proposed Rate Schedules

Energy Probe has not reviewed the proposed rate schedules in any detail, as that is usually done by Board Staff. As such Energy Probe is relying on Staff to undertake this review.