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BY E-MAIL

January 6, 2015

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Hydro One Brampton Networks Inc.
2015 Distribution Rates Application
Board Staff Submission
Board File No. EB-2014-0083**

In accordance with the Decision and Order issued on December 18, 2014, please find attached the Board Staff comments on the draft rate order filed by Hydro One Brampton Networks Inc.

As a reminder, Hydro One Brampton's reply comments are due by January 12, 2015.

Yours truly,

Original Signed By

Martha McOuat
Project Advisor

Hydro One Brampton Networks Inc.
2015 Distribution Rate Application (EB-2014-0083)
Draft Rate Order

Board Staff Comments

On December 18, 2014, the Board issued its Decision and Order (the “Decision”) on Hydro One Brampton’s rate application. The Decision required Hydro One Brampton to submit its draft Rate Order (“DRO”) within 5 days of the issuance of the Decision. Hydro One Brampton submitted its DRO and supporting documentation on December 23, 2014.

Board staff has reviewed the draft rate order and all supporting schedules, and submits that Hydro One Brampton has correctly reflected the Board’s Decision in its draft rate order. Board staff notes certain administrative errors and omissions, which are addressed below.

At page 9 of the DRO, Hydro One Brampton has included a summary of approvals by the Board. Board staff submits that this inclusion is a useful enhancement to the record. However, Board staff notes that Hydro One Brampton has neglected to include the approved rate base in the list. Board staff submits that a complete record of the Board’s approvals should include the approved rate base and its components, and that the list should be revised accordingly.

In its January 6, 2015 comments, Energy Probe noted that there did not appear to be any mention in the DRO of the Board’s order for HOBNI to file a working capital allowance study undertaken by a third party at its next cost of service application. Energy Probe submitted this order from the Board should be included in the DRO to ensure a complete reflection of the Board’s findings in this matter.

Board staff notes that documentation of such orders of the Board arising from a decision are not a required element of the DRO, but must be addressed in Hydro One Brampton’s next cost of service application in accordance with the Filing Requirements. However, Board staff submits that in this case, the documentation of the order to file a working capital allowance study would be a helpful addition to the summary of specific approvals in order to ensure a complete reflection of the Board’s findings. Board staff suggests that it could be appropriately included in the section regarding rate base and

components noted above.

Board staff also notes that the tariff sheet as submitted in the DRO correctly reflects the rates as calculated to reflect the Board's decision. However, Board staff notes that it contains certain generic formatting errors which are inconsistent with the Board's template. In order to eliminate the possibility of clerical errors in creating a new tariff of rates and charges for inclusion with the Final Rate Order, Board staff has attached a template to this submission and requests that Hydro One Brampton complete and return it with its reply submission.

All of which is respectfully submitted.