



Jay Shepherd

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BY EMAIL and RESS

January 6, 2015
Our File No. 20140213

Hydro One Networks Inc.
483 Bay Street
Toronto, ON
M5G 2P5

Attn: Michael Engelberg, Assistant General Counsel

Dear Mr. Engelberg:

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

We are counsel for the School Energy Coalition. In preparation for the oral hearing in this matter, SEC requests that you provide the following document:

- Appendix A to the letter of Ross Macmillan, President and CEO of Woodstock Hydro, dated November 5, 2013, to the City of Woodstock. This is the White Paper prepared on behalf of the Board of Directors of the utility, analysing the impact of a sale to Hydro One on the shareholder and the customers, and providing a commentary on the policy implications of that proposed sale. A copy of the letter, and the other appendix (Appendix B) to the letter, is attached.

If you do not object to production, please provide it at your earliest convenience so that we can prepare our cross-examination of your witnesses.

We understand that the shareholder and certain local residents are currently in a dispute before the Information and Privacy Commissioner as to whether that document should be made public, and that the Ontario Energy Board's public review process for these transactions is one of the justifications given by the City for refusing to make the document public. In the event that the Applicants are claiming confidentiality with respect to this document, please advise, including the reasons for confidentiality, so that we can provide the appropriate Declaration and Undertaking in the Board's form and thus gain access to that document prior to the oral hearing.



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If the Applicants object to production of this document on any other ground, we would ask that you bring copies to the hearing on January 15th, so that if we are successful in obtaining a Board order for production, it will be readily available.

We also note that the Applicants refused to provide the documents requested in two SEC interrogatories: Ex. 1/2/26, and 1/2/27. We would ask that you have copies of those documents available as well in the hearing room on January 15th, as we may ask the Board to order production of those documents as well, depending on the answers to questions during cross-examination.

Finally, we note that Mr. David Creery is one of those copied on the Macmillan letter and attachments, and is listed in this proceeding as the representative of the Applicant Woodstock Hydro. Please confirm the Mr. Creery will be one of the witnesses of the Applicants in the oral hearing. If that is not the case, please have Mr. Creery present at the oral hearing, so that if the Board so determines we can cross-examine him on these documents, and on the protection of customers by the City in its negotiations.

All of which is respectfully submitted.

Yours very truly,

JAY SHEPHERD P. C.

Jay Shepherd

cc: Wayne McNally, SEC
Gordon Nettleton, McCarthy Tetrault
Mark Rodger, BLG
David Creery, City of Woodstock
Maureen Helt, OEB
Interested Parties