

January 13, 2014 by email
J Mark Rodger
Borden Ladner Gervais LLP
Scotia Plaza, 40 King St W
Toronto, ON M5H 3Y4

Dear Mr Rodger,

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

I represent Concerned Citizens Against the Sale of Woodstock Hydro (CSASWH). In preparation for the oral hearing in this matter, CSASWH requests that you provide the following documents I believe are in your possession:

- Appendix A to the letter of Ross McMillan, President and CEO of Woodstock Hydro, dated November 5, 2013, to the City of Woodstock. This is a white paper prepared by the Woodstock Hydro Services Inc. Board of Directors and Woodstock Hydro Services Inc. senior management 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 letter and attachments, dated February 10, 2014, from Ross McMillan, President and CEO of Woodstock Hydro to the City of Woodstock. This is supplementary correspondence is considered an addendum to the white paper noted above.
- A letter from Elizabeth Carswell, Manager of Internal Services and Board Secretary, Woodstock Hydro Services Inc of June 6, 2014 to the City of Woodstock. It is believed to report errors and omissions and questions stemming from their receipt of Share Purchase Agreement May 21, 2014.
- Letter of June 6, 2014 from Ross McMillan to the City of Woodstock and minutes of the Board meeting June 4, 2014 including a variety of matters, including the sale of Woodstock Hydro Holdings Inc. to Hydro One Networks Inc.

If you are objecting to production of these documents we ask that you bring copies to the hearing on January 15th so that if we are successful in obtaining a Board order for production, they will be readily available.

I am in receipt of correspondence between Mr Jay Shepherd dated January 6, 2015 and a letter in response dated January 7, 2014 from Mr Gordon Nettleton. Mr Shepherd raises the question and I do now about the presence of Mr David Creery who is one of those receiving the above correspondence and would have direct evidence to share with the Board. Should the Board determine, his cross- examination would be on the above documents and on the protection of customers by the City in its negotiations.

Respectively submitted,



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cc: Jay Shepherd, Professional Corporation
Gordon Nettleton, McCarthy Tetrault
David Creery, City of Woodstock
Maureen Helt, OEB