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Our File # 339583-000171

By electronic filing

April 7, 2015

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

Dear Ms Walli

Re:	Hydro One Networks Inc. ("Hydro One") 2015 to 2019 Distribution Application
Board File #:	EB-2013-0416

We are writing as counsel for Canadian Manufacturers & Exporters ("CME").

We have reviewed the Draft Rate Order ("DRO"), participated in the Technical Conference, and reviewed the additional information filed on April 2, 2015. We have also had the opportunity of reviewing the School Energy Coalition's ("SEC") submissions on the DRO dated April 6, 2015.

We support the principle that recovery of foregone revenue should, to the greatest extent possible, track the actual "over/under" collection of revenues from each customer for the first four (4) months of the year. For this reason, we support SEC's position that foregone revenue be recovered through both the fixed and variable charge.

We also note that a number of Cable companies have sought late intervenor status to bring a motion for review and variance of the March 12, 2015 Decision. We would urge the Board to consider whether its direction at page 41 of the Decision that rate mitigation be applied for customers that experience undue rate impacts (an increase greater than 10% on the total bill) would apply to the Cable companies.

Subject to that single comment, we have no further comments on the DRO and are satisfied that all other elements of the DRO, as filed by Hydro One, appropriately reflect the OEB's March 12, 2015 Decision.

Yours very truly

A handwritten signature in dark ink, appearing to read 'VJ DeRose', with a long horizontal flourish extending to the right.

Vincent J. DeRose
c. Susan Frank and Erin Henderson (Hydro One)
Intervenors EB-2013-0416
Paul Clipsham and Ian Shaw (CME)

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