April 30, 2015

Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street P.O. Box 2319 Toronto, Ontario M4P 1E4

Dear Ms. Walli:

## Re: EB-2013-0421 - Hydro One Networks Inc. - New Cost Allocation - Phase 2

The Consumers Council of Canada ("Council") is an intervenor in the above-referenced proceeding. The Council will not be filing any evidence in this proceeding. The Council agrees with the E3 coalition, the Canadian Manufacturers and Exporters ("CME") and Toyota Motor Manufacturing Canada Inc. ("TMMC") that this proceeding should go to an oral hearing. The Board stated in Procedural Order No. 3, dated January 30, 2015, that it has decided that in addition to considering the specific cost allocation issues and associated proposals in this proceeding, it will examine the broader policy question as to whether its regulatory instruments need to be revised in relation to cost allocation. The Board's decision will therefore be implemented more generally, including consideration of any necessary revisions to the Transmission System Code and/or Distribution System Code, as well as to this application.

Since this proceeding will look at the broader policy question addressing cost allocation, and therefore could ultimately affect consumer rates in the future across the Province, CCC believes this proceeding should be considered through oral evidence and cross examination.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC: Hydro One Networks Inc.

All Interested Parties