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BY EMAIL and RESS

March 16, 2016

Borden Ladner Gervais
40 King Street West
40th Floor
Toronto, Ontario

Attn: James Sidlofsky

Dear. Mr. Sidlofsky:

Re: EB-2015-0089 - Milton Hydro - Materials for Oral Hearing

We represent Energy Probe Research Foundation in this proceeding. This letter is being sent to request the update of a number of tables that will be used in the cross examination on OM&A at the oral hearing in this matter.

We would ask that updates to the following tables be filed with the Board this week, so that they can be reviewed prior to the oral hearing. These updated tables will likely result in reduced cross examination and eliminate the need for these tables to be updated through undertakings.

We request that the following tables be updated to reflect actual 2015 costs, or in the event that actual 2015 costs are not yet available, they be updated to reflect the most recent information available. Some of the tables were updated to include actual data through October, 2015 as part of various interrogatory responses. However, given the three months that have transpired since the interrogatory responses, additional actual data is likely available, although it may not yet be audited. The tables requested to be updated for 2015 are:

- i) Table 4-8 (Appendix 2-JB),
- ii) Table 4-12 (Appendix 2-L),
- iii) Table 4-13 (Appendix 2-JC),
- iv) Table 4-14 (Appendix 2-K) modified to include employee costs charged to OM&A and capital as found in the response to 4-Energy Probe-25, and
- v) Table 4-51 (property taxes).

In addition to the above tables, Energy Probe requests that Milton Hydro file the electronic spreadsheet requested in Interrogatory 1.0-Staff-7 that was used to calculate the stretch factor groups found in the response.

Thank you for your co-operation.

Yours very truly,

Randy Aiken

Randy Aiken
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cc: David MacIntosh (Energy Probe)
Interested Parties