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March 1, 2017

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

Dear Ms. Walli: **Board File No. EB-2016-0110 --- Welland Hydro-Electric System Corp
2017 Cost of Service Rates Application
Energy Probe – Interrogatories to Applicant**

Pursuant to Procedural Order #1, dated February 16, 2017, please find attached the Interrogatories of Energy Probe Research Foundation (Energy Probe) to Welland Hydro-Electric System Corp. in the EB-2016-0110 proceeding.

Energy Probe notes the extensive engagement of Board Staff with Welland Hydro's 2017 Cost of Service Application. Given the role of Board Staff in review of the Application, the Primary areas of focus of Energy Probe Interrogatories are:

- The appropriate form of the IRM following this COS Rebasing Application
- The Benchmarking of Certain Components of the 2017 Base Revenue Requirement
- Performance Standards
- The Treatment of In-Service Assets
- Staffing, Payroll, Compensation as a major component of base OM&A Expense.

We have relied on Board Staff regarding the review of the Distribution System Plan and the Revenue Requirement Work Form, Tax and other Chapter 2 Filing Requirements. Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh
Case Manager

cc. Wayne Armstrong, COO Welland Hydro-Electric System Corp. (By email)
John A.D. Vellone, Borden Ladner Gervais LLP (By email)
Roger Higgin, Consultant to Energy Probe (By email)
Parties of Interest (By email)

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