



April 17, 2017

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

Re: Thunder Bay Hydro Electricity Distribution Inc. (TBHEDI)
Expert Witness
Board File No. EB-2016-0105

Dear Ms. Walli:

AMPCO has reviewed TBHEDI's Oral Hearing Plan and Expert letter dated April 6, 2017 wherein TBHEDI indicates that to assist the Board on matters relating to issue 1.1 (Capital), TBHEDI has retained Mr. Yury Tsimberg of Kinectrics to review and opine on the Thunder Bay Hydro distribution system plan (DSP). AMPCO has also reviewed Kinectrics opinion letter provided on April 7, 2017, dated March 24, 2017, that indicates Mr. Tsimberg was instructed by TBHEDI to provide expert testimony at the oral hearing particularly as it relates to reasonableness of the capital investment levels requested under the System Renewal category based on the findings of the Kinectrics 2016 Asset Condition Assessment (ACA) study.

Until this point there has been no indication that TBHEDI will be advancing a witness to defend the Kinectrics ACA Report and TBHEDI's DSP. In AMPCO's view, this appears to be a last minute addition to shore up the capital evidence; new evidence on which intervenors have not had an appropriate opportunity for discovery.

AMPCO has reviewed the letter filed by School Energy Coalition (SEC) on April 13, 2017 in response to this new evidence. For the reasons provided by SEC, AMPCO agrees that Mr. Tsimberg's opinion on the DSP does not meet the requirements of Rule 13 of the Rules of Practice and Procedure.

Specifically, AMPCO supports the requests of SEC that the Board direct the following:

- Filing of a proper expert report from Mr. Tsimberg, compliant in all respects with Rule 13 of the Rules of Practice;
- A process for discovery of the expert evidence through either a transcribed technical conference, or interrogatories; and
- A rescheduling of the oral hearing from April 20 and 21, 2017 to early May, to allow for the time needed to complete the above two steps.

Please do not hesitate to contact me if you have any questions or require further information.

Sincerely yours,

ORIGINAL SIGNED BY

Colin Anderson
President
Association of Major Power Consumers in Ontario

Copy to: Thunder Bay Hydro Electricity Distribution Inc.