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BY COURIER

August 14, 2017

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Suite 2700
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Walli:

EB-2016-0276 – Hydro One Networks Inc. Notice of Motion to Review and Vary Procedural Order No. 6

Please find enclosed the Notice of Motion of Hydro One Inc. with Hydro One Inc.'s Submission.
Two hard copies will be sent to the Board shortly.

An electronic copy of this cover letter and the attached Notion of Motion has been filed through the Ontario Energy Board's Regulatory Electronic Submission System (RESS).

Sincerely,

ORIGINAL SIGNED BY JOANNE RICHARDSON

Joanne Richardson

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B.

AND IN THE MATTER OF an application made by Hydro One Inc. for leave to purchase the shares of Orillia Power Distribution Corporation.

AND IN THE MATTER OF an application made by Orillia Power Distribution Corporation for leave to transfer its distribution system to Hydro One Networks Inc.

AND IN THE MATTER OF Procedural Order No. 6 issued in the within proceeding on July 27, 2017.

AND IN THE MATTER OF sections 8 and 40 of the OEB Rules of Practice and Procedure.

NOTICE OF MOTION

Hydro One Inc. ("Hydro One") will make a motion to the Ontario Energy Board ("the Board") on a date and at a time to be determined by the Board.

PROPOSED METHOD OF HEARING: Hydro One proposes that the motion be heard in writing.

THE MOTION IS FOR an Order or Orders of the Board to review and vary Procedural Order No. 6 issued in this proceeding on July 27, 2017 ("the Decision"), so that this proceeding can continue in the ordinary course and not be held in abeyance until further notice.

THE GROUNDS FOR THE MOTION ARE:

1. The decision in Procedural Order No. 6 finds that rates to be established in the Distribution Rates Application of Hydro One Networks Inc.[1] for the period 2018 through 2022 are relevant to EB-2016-0276. However, because Orillia Power Distribution Corporation ("OPDC") customers affected by the EB-2016-0276 proceeding are unaffected by the Distribution Rates Application this cannot be the case. Hydro One has sought approval from the Board for a 10-year deferred rebasing period in compliance with the Board's Consolidation Policies[2]. The first five years of that period request a reduction in base distribution rates of 1% and to have such reduced rates apply for the next five years. This is also outlined in the commercial agreement between the two parties. In Years 6 to 10 of the deferral period, Hydro One has proposed to adjust OPDC's customers' rates by a Price Cap Adjustment Mechanism, consistent with the methodology outlined in EB-2014-0138. Therefore, in no way are the customers of OPDC affected by any potential outcomes or decisions made in the Distribution Rates Application. Hydro One is not proposing to consolidate the Orillia ratepayers into Hydro One Distribution rate classes until Year 11 following the close of this transaction. The Distribution Rates Application pertains only to the period 2018-2022. By definition, decisions taken in that proceeding cannot impact OPDC consolidation given the 6-year gap.

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[1] EB-2017-0049

[2] EB-2014-0137 Report of the Board "*Rate-Making Associated with Distributor Consolidation*" (issued March 26, 2015) and "*Handbook to Electricity and Transmitter Consolidations*" (issued January 19, 2016)

2. The decision in Procedural Order No. 6 should be varied, and the proceeding can continue in the normal course, since:

    (a) it is inconsistent with previous Board decisions that state that MAAD applications under section 86 are about the ongoing cost structures and <u>not</u> about the approval of future rates for the acquired customers;

    (b) it is based on the belief that the evidence and record in EB-2016-0276 (a section 86 application) are reliant on the evidence and findings from the Distribution Rates Application of Hydro One Networks Inc. (a section 78 application) to enable the Board to determine whether the transaction proposed in EB-2016-0276 satisfies the Board's no harm test. On the contrary, the record and evidence in EB-2016-0276 are complete to enable a fully-informed decision on this MAAD application and will not be informed or assisted by the record and evidence in the Distribution Rates Application of Hydro One Networks Inc.; and

    (c) it assumes that decisions regarding consolidation of the three[3] LDCs (already acquired by Hydro One) in year 2021 of the Distribution Rates Application of Hydro One Networks Inc. are relevant to and affect future rates of OPDC customers. The rates of those already-acquired LDCs cannot be relevant, because OPDC consolidation will not occur until the 10-year deferral period

[3] Norfolk Power Distribution Inc., Haldimand County Hydro Inc., Woodstock Hydro Services Inc.

ends, which is well beyond the duration of the Distribution Rates Application decision.

3. The decision in Procedural Order No. 6 creates procedural unfairness, prejudice and delay to the parties to the purchase and sale of OPDC, to the ratepayers of the said LDC, and to the stated wishes of the Government of Ontario regarding future consolidation of the Ontario electricity distribution industry because:
   (a) there has already been substantial delay in this proceeding, and the effect of Procedural Order No. 6 will delay the matter at least another six to twelve months or longer;
   (b) no party was given an opportunity, prior to the issuance of Procedural Order No. 6, to make submissions as to the lack of relevance of Hydro One Networks Inc.'s Distribution Rate Application or to make submissions as to the effect, on future consolidation of the distribution sector, of a substantial, indefinite delay of a decision in this proceeding; and
   (c) the co-Applicants were not given the opportunity, prior to the issuance of Procedural Order No. 6, to make submissions as to the lack of relevance of future rate proposals that would be in effect as of 11 years beyond current day.

THE FOLLOWING DOCUMENTS will be used at the hearing of the motion:

(a) Procedural Order No. 6, issued by the Board on July 27, 2017;

(b) the record of this Proceeding, EB-2016-0276;

(c) the written Submission of Hydro One, appended to this Notice of Motion;

(d) sections 8 and 40 of the OEB Rules of Practice and Procedure; and

(e) such further and other documentation as counsel may submit and the Board may allow.

August 14, 2017

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AND TO: All Intervenors

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B.

AND IN THE MATTER OF an application made by Hydro One Inc. for leave to purchase the shares of Orillia Power Distribution Corporation.

AND IN THE MATTER OF an application made by Orillia Power Distribution Corporation for leave to transfer its distribution system to Hydro One Networks Inc.

AND IN THE MATTER OF Procedural Order No. 6 issued in the within proceeding on July 27, 2017.

AND IN THE MATTER OF sections 8 and 40 of the OEB Rules of Practice and Procedure.

SUBMISSION OF THE APPLICANT HYDRO ONE INC.

ON ITS MOTION TO REVIEW AND VARY PROCEDURAL ORDER NO. 6

1. The Applicant (Moving Party) Hydro One Inc. ("Hydro One") repeats and relies on the grounds provided in Hydro One's Notice of Motion.

2. Hydro One respectfully submits that the Board's assessment of the "no harm" test cannot be and will not be informed by the Distribution Rate Application of Hydro One Networks Inc. and, furthermore, that Hydro One and its co-Applicant have already satisfied the no harm test.

3. MAAD applications under section 86 of the *Ontario Energy Board Act, 1998* ("the Act) are about ongoing cost structures, not about the approval of future rates.

4. Procedural Order No. 6 (“PO 6”) is inconsistent with previous Board decisions. It is impossible for the Board to predict what rates will be in Year 11, once OPDC’s customers are integrated into Hydro One Network Inc.’s revenue requirement, hence the inapplicability of the 2018-2022 Distribution Rate Application of Hydro One Networks Inc. (“the Distribution Rate Application”).

5. Rather than looking at the Distribution Rate Application, it is necessary, proper and appropriate to assess the no harm test by relying only on the evidence in EB-2016-0276 concerning the expected reductions to cost structures.

6. Furthermore, to set expectations at this time as to what rates OPDC customers will have in 11 years is a task that is neither appropriate nor meaningful. It is standard Board practice that rates of an acquired utility should be determined at the first applicable (future) rate proceeding, not during a MAAD application. As the Board stated at page 16 of the Hydro One/NPDI decision:

> “In accordance with the 2007 Report, the Board’s decision will not consider future rates at this time. However, as indicated in the Motion Decision, in applying the no harm test it is appropriate for the Board to assess the cost structures that will be introduced as a result of the acquisition, in comparison to the cost structures that underpin NPDI’s current rates.”

7. The statement above does not differ from the Board’s assessment of other MAAD applications, including, most recently, the Alectra MAAD application, where in assessing the

impact on the customers of the lowest cost entity in that transaction, Hydro One Brampton, the Board stated at page 12 of the decision:

> "The OEB considers the long term effect of a proposed transaction on cost structures. This is aligned with the long-term investment cycles of the distribution sector where most distribution assets have life expectancies in the 40 year range. Hydro One Brampton is identified as being the lowest cost entity involved in this transaction. The OEB notes that Hydro One Brampton will have additional scale available to it in the long term and its existing cost structures are embedded in its rates for the next 10 years. The OEB will consider the matter of its rates and the impact of rate harmonization in the context of a rate application. In the OEB's view, there will be no net negative impact on Hydro One Brampton's customers in the long term in comparison to the status quo."

8. Similarly, Hydro One submits that it continues to be appropriate for the Board to consider the impacts of the anticipated savings of the consolidation in a future rate proceeding for the current OPDC, namely, a rate proceeding after the 10-year deferred rebasing period.

9. The dichotomy in the assessment of current rates with future cost structures is ultimately exhibited in the Board's approval of the Energy+ MAAD. In that application, the estimate for the distribution rate impacts following harmonization of rates in 2019 indicated a 54.8% increase for Brant County Power Inc.'s GS>50kW customer class, with the Applicant confirming that it will include rate mitigation measures in accordance with Board policy to address the rate impact (page 8 of the decision). Notwithstanding that estimated rate increase, the transaction still met the OEB no-harm test and was approved, because the Board found that despite the future rate

increases, "… the evidence indicates that the proposed transaction can reasonably be expected to result in cost savings and operational efficiencies[1]".

10. Hydro One agrees with the Board's policies and previous decisions that cost structures, not rates, should be used to assess the no harm test. Hydro One reiterates not only that there is sufficient evidence on the record in this proceeding for the Board to determine that there will be a significant reduction to the cost structures as a result of this transaction, but also that the Distribution Rates Application proceeding regarding Hydro One Networks Inc. is irrelevant to the Orillia MAAD Application (EB-2016-0276).

11. In EB-2016-0276, Hydro One has filed all the required information requested by the Board in the MAAD consolidation filing guidelines[2]. Within the evidence and record of this proceeding, Hydro One has highlighted, among other benefits that this acquisition will result in:

- Expected ongoing OM&A savings of $3.9 million per year
- Expected ongoing capital savings of $0.6 million per year
- A defined 10-year rebasing deferral period
- The implementation of a guaranteed earnings sharing mechanism during Years 6-10
- Maintenance or improvement of the adequacy, quality, and reliability of service
- The elimination of redundant activities and artificial electrical borders
- Expected operation and maintenance scale efficiencies by leveraging Hydro One's economies of scale
- Lower future costs as OPDC's current debt is refinanced at a lower rate relative to the status quo
- Improved access to call centre – In addition to having access to an IVR, Hydro One's call centre is open 4 additional hours per day Monday through Friday, as well as being open on Saturdays.

[1] EB-2014-0217, Decision and Order, October 30, 2014, page 6
[2] OEB Filing Requirements for Consolidation Applications, January 19, 2016

12. Hydro One submits that the evidence and record of this proceeding clearly outline that there will be no harm to the directly-affected customers; in fact, those customers will receive multiple benefits from this transaction.

13. There will be no further information in the Distribution Rate Application that will assist the Board in determining whether these customers are harmed. As the Board wrote in the Hydro One/HCHI decision (EB-2014-0244), “Future Panels of the OEB will be guided in their decisions in setting rates by these expectations and the realities of the rate-setting environment at the time of rebasing”, where the expectation is that future rates will be reflective of the cost to serve inclusive of the achieved consolidation savings. OPDC rates will reflect the cost to serve these customers, as required by the Board, after the 10-year deferral period has elapsed.

14. Furthermore, OPDC customers’ rates will not be affected by the Distribution Rate Application of Hydro One Networks Inc.

15. As stated above, future rates are not part of the Board’s review of a consolidation application; in fact, rate comparisons skew the no-harm analysis of cost structures and are not necessarily reflective of future rates that customers who are party to a MAAD transaction will incur.

16. Hydro One has stated that it will not rebase OPDC rates for the ten years post-acquisition. In alignment with EB-2014-0138 “Report of the Board: Rate-Making Associated with Distributor Consolidation”, the Orillia MAAD Application sets forth how rates will be

determined for the ten years following the approval and close of the transaction. Therefore, even if future rates were deemed necessary to assess the no harm test (which is not the case), any decision emanating from the five-year Distribution Rates Application will not impact OPDC customers and will not assist the Board in making a decision in EB-2016-0276.

17. The Board's policies and previous decisions clearly articulate that ongoing cost structures, not rates, are subject to consideration in review and approval of a consolidation transaction such as EB-2016-0276. The Handbook to Electricity Distributor and Transmitter Consolidations says, at page 11,

> "Rate-setting following a consolidation will not be addressed in an application for approval of a consolidation transaction unless there is a rate proposal that is an integral aspect of the consolidation e.g. a temporary rate reduction. Rate-setting for the consolidated entity will be addressed in a separate rate application, in accordance with the rate setting policies established by the OEB. The OEB's review of a utility's revenue requirement, and the establishment of distribution rates paid by customers, occurs through an open, fair, transparent and robust process ensuring the protection of customers."

18. This open, fair, transparent and robust utility revenue requirement review process is currently underway for the three previously-acquired LDCs ("the Three Previously-Acquired LDCs")[3] in the Distribution Rate Application of Hydro One Networks Inc. The Distribution Rate Application is an application for proposed rates, and Hydro One Networks Inc. fully expects that:

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[3] Encompassing the former territories of Norfolk Power Distribution Inc., Woodstock Hydro Services Inc., Haldimand County Hydro Inc.

(a) the cost allocation proposal and corresponding rates for the Three Previously-Acquired LDCs will be fully reviewed and tested during the said Distribution Rate Application hearing; and

(b) whatever the Board ultimately approves in the Distribution Rate Application will reflect the Board's view as to what costs should appropriately be allocated to the customers of the Three Previously Acquired LDCs.

19. The Distribution Rate Application does not include a rate proposal for OPDC customers. If the Orillia MAAD Application is approved as submitted, new rates for OPDC customers will not be required until at least two future rate applications from the Distribution Rate Application.

20. Therefore, in EB-2016-0276, the Board should be concerned only with how the rates of the acquired utility, OPDC, will be determined during the deferred rebasing period. The transaction is such that Hydro One will provide a 1% reduction on base distribution delivery rates, frozen for five years, followed by a price cap adjustment applied in years six through ten that also includes an earnings-sharing mechanism over that same time period.

21. To assist the Board, Hydro One has developed a 10-year customer rate outlook comparing OPDC's customers' rates status quo (assuming OPDC would have rebased two more times over the 10-year deferral period) to the rate benefit they will receive if the Application is approved, using rate-making assumptions provided in the Application (See Appendix A). This rate outlook is consistent with the Board's determination of the no harm test in the Alectra decision, which stated, at page 19:

> "As set out earlier in the no harm analysis, the OEB finds that this transaction is within the range of transactions anticipated by the OEB's policy. The outcomes are aligned with the policy's objective of improving the efficiency of electricity distribution. As discussed earlier, the proposal should be compared to the status quo scenario, from an earnings potential perspective, whereby each utility could rebase at least once more within the 10 years, and any earnings above 300 basis points over the regulated rate of return would all flow to the shareholder until rates were reset. The OEB finds that customers will be not be harmed and will likely benefit in the long term from the enduring benefits of scale enhancements of service delivery arising from this transaction."

22. The results in Appendix A illustrate that over the 10-year deferral period, based on average consumptions, all current OPDC customers will experience a cumulative bill benefit or savings between approximately $600 and $18,000 – indicative of no harm to ratepayers.

23. The Board's service levels indicate 130 calendar days to provide a decision on a MAAD application for a written hearing.

24. The Share Purchase Agreement for OPDC was entered into by the parties on August 15, 2016, almost a year prior to the Board's issuance of PO 6. The MAAD application was submitted less than six weeks later, on September 27, 2016.

25. On January 20, 2017, the discovery phase of the Application was completed, as all interrogatory responses had been provided by the Applicant. Final arguments were submitted on May 5, 2017. In PO 6 on July 27, 2017, the Board determined that this proceeding will be held in abeyance until the release of the decision of the Distribution Rate Application.

26. PO 6 was issued without the Board's benefit of hearing submissions from the two Applicants, Hydro One and OPDC.

27. No procedural order has been issued in the Distribution Rate Application, which means that if PO 6 stands, EB-2016-0276 may be held in abeyance for at least another 6 to 12 months, in addition to the 300 days since the EB-2016-0276 application was filed.

28. Additionally, if the Board decides to defer MAAD approvals until future acquired utility rates are assessed in a s. 78 application, the ability of Hydro One and other applicants to be active consolidators in the Province will be seriously hindered, significantly impacting the sector's ability to effectively complete the aims of the Government of Ontario, documented in the Distribution Sector Review Panel, to create economic efficiencies and cost effectiveness in the distribution sector, consistent with the Board's objectives.

29. In developing the prefiled evidence, arguments and interrogatory submissions in this Application, Hydro One has made a concerted effort to incorporate the direction and guidance of the Board in previous MAAD decisions, the Board's policies and its Handbook for Distributor Consolidation. None of the Board's previous guidance with respect to MAADs has indicated that the Board requires future rate proposals (11 years beyond current day) in order to assess harm.

30. In addition to the significant impact to Hydro One of this proposed delay, there is also a significant impact on the shareholders of OPDC, their customers and staff, e.g.:

- OPDC shareholders will have forgone a 2017 price cap adjustment in anticipation that this Application would have been approved in a timely manner;

- OPDC customers have been anticipating a change in ownership that has been discussed in this application, through media outlets and other forums. Customers remain uncertain about who will be serving them and what rates they will experience in the foreseeable future; and

- OPDC, in anticipation of an acquisition, has not been replacing staff that have been lost due to attrition and retirement, which has the potential to impact the overall operations of the utility.

31. For all the above reasons, Hydro One submits that:

(a) OPDC is not one of the Three Previously-Acquired LDCs whose rates will be determined in the Distribution Rate Application of Hydro One Networks Inc.;

(b) the evidence and record in the Distribution Rate Application are not relevant to EB-2016-0276;

(c) analysis and determination of the Board's no harm test for the OPDC transaction will not be informed by the evidence and record in the Distribution Rate Application;

(d) the issuance of PO 6 without the Applicants' opportunity to make submissions in respect thereof was procedurally unfair;

(e) a further, indefinite delay of this Application is procedurally unfair, harmful to the Province's LDC consolidation goals and harmful to OPDC and its customers; and

(f) PO 6 should therefore be varied so as to allow this Application to proceed immediately in the ordinary course, without a consideration of irrelevant evidence from any other proceeding.

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

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Michael Engelberg
Counsel for the Applicant (Moving Party) Hydro One Inc.

Total Bill Analysis

Deferred Rebasing Period Benefit to OPDC Customers as a Result of Transaction

	2016[1]	2017[2]	2018	2019	2020	2021	2022	2023	2024	2025	2026
Class - Residential — **Scenario Assumption**		Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Status Quo[3]	$ 146.00	$110.06	$111.82	$112.29	$112.78	$113.26	$113.75	$115.74	$116.26	$116.78	$117.40
With Acquisition	$ 146.00	$109.34	$109.34	$109.34	$109.34	$109.34	$110.06	$110.52	$110.98	$111.45	$111.93
Monthly Benefit		$0.72	$2.48	$2.96	$3.44	$3.92	$3.70	$5.22	$5.28	$5.33	$5.47
Annual Benefit		$8.63	$29.80	$35.47	$41.27	$47.06	$44.35	$62.68	$63.32	$63.95	$65.65
Add Annual ESM Benefit/Refund (Note 1)		$0.00	$0.00	$0.00	$0.00	$0.00	$31.03	$29.17	$27.34	$25.16	$22.90
Each OPDC Customer in Class Benefits from the Acquisition by;		**$8.63**	**$29.80**	**$35.47**	**$41.27**	**$47.06**	**$75.38**	**$91.85**	**$90.66**	**$89.11**	**$88.54**
										10 year Cumulative Benefit	**$598**
GS < 50 kW — **Scenario Assumption**											
Status Quo[3]	$ 393.17	$297.12	$301.61	$302.91	$304.23	$305.57	$306.91	$311.93	$313.33	$314.73	$316.15
With Acquisition	$ 393.17	$295.05	$295.05	$295.05	$295.05	$295.05	$297.12	$298.39	$299.67	$300.96	$302.26
Monthly Benefit		$2.07	$6.56	$7.86	$9.19	$10.52	$9.80	$13.55	$13.66	$13.78	$13.89
Annual Benefit		$24.82	$78.75	$94.37	$110.25	$126.25	$117.56	$162.54	$163.93	$165.31	$166.70
Add Annual ESM Benefit/Refund (Note 1)		$0.00	$0.00	$0.00	$0.00	$0.00	$96.43	$90.65	$84.99	$78.20	$71.16
Each OPDC Customer in Class Benefits from the Acquisition by;		**$24.82**	**$78.75**	**$94.37**	**$110.25**	**$126.25**	**$213.99**	**$253.19**	**$248.91**	**$243.51**	**$237.86**
										10 year Cumulative Benefit	**$1,632**
GS > 50 kW — **Scenario Assumption**											
Status Quo[3]	$ 11,780.39	$11,610	$11,658	$11,672	$11,686	$11,700	$11,714	$11,768	$11,784	$11,799	$11,815
With Acquisition	$ 11,780.39	$11,590	$11,590	$11,590	$11,590	$11,590	$11,610	$11,623	$11,636	$11,649	$11,663
Monthly Benefit		$21	$69	$82	$96	$110	$104	$145	$148	$150	$152
Annual Benefit		$246	$824	$987	$1,153	$1,322	$1,247	$1,745	$1,773	$1,801	$1,830
Add Annual ESM Benefit/Refund (Note 1)		$0	$0	$0	$0	$0	$1,105	$1,039	$974	$896	$816
Each OPDC Customer in Class Benefits from the Acquisition by;		**$246**	**$824**	**$987**	**$1,153**	**$1,322**	**$2,352**	**$2,784**	**$2,747**	**$2,698**	**$2,646**
										10 year Cumulative Benefit	**$17,759**

Notes:

1 Per Attachment 7, EB-2016-0276 - Note GS<50kW. Note the DRC Rate was corrected in the Interrogatory response to Board Staff - Exhibit I, Tab 1, Schedule 5 (a)
2 2017 rates forward incorporate Fair Hydro Plan which included changes to Regulatory Changes, Commodity Prices and other credits
3 "Status Quo" Rate Setting Assumption: OPDC submits Cost of Service applications in 2018 and 2023 (last COS EB-2009-0273 for 2010 rates); all other years previously approved rates adjusted by Price Cap Adjustment
4 "With Acquisition" Rate Setting Assumption: 2017-21 base distribution rates reduced by 1% from current 2016 rates; 2022 -2026 rates reflect 2016 rates increased annual by Price Cap Adjustment

Price Cap Adjustment Applied : (Held constant over extended deferred rebasing period)
Inflation Factor = 1.9%
Productivity and Stretch Factor = 0.3%

Cost of Service Year Adjustment Assumptions Applied :
Distribution Rates are increased by 6%. This 6% increase assumption represents the OEB approved average increase from the 31 LDC's who rebased in the 2016 and 2017 rate years.

5 For illustrative purposes ONLY, Hydro One has calculated the potential allocation of the guaranteed ESM refund , as follows:

Allocation of the Annual ESM Refund to OPDC Customers

	2015 Revenue Requirement [6]	% Weighting	Customers per class [6]
Proposed Total Annual ESM Refund	*PER ESM Evidence (A-3-1 - Table 6)*		
Customer Class			
Residential	$ 4,133,061	48%	11,916
General Service < 50kW	$ 1,467,186	17%	1,361
General Service > 50kW	$ 2,076,212	24%	168
Other (Incl Non-Metered Scattered Load)	$ 898,110	10%	-
Total	**$ 8,574,569**	**100%**	**13,445**

Year of Refund	2022	2023	2024	2025	2026
Total Annual Refund ($'s)	767,000	721,000	676,000	622,000	566,000
				TOTAL ESM (years 6 to 10)	**3,352,000**
Dollar / Customer Refund	31	29	27	25	23
Dollar / Customer Refund	96	91	85	78	71
Dollar / Customer Refund	1,105	1,039	974	896	816

6 Per the OEB's 2015 Yearbook (2016 is not available yet) . Total Distribution Revenue is per Tab = '2015 I/S' ; & Distribution Revenue by Class is per Tab = '2015 Stats by Class'
7 Per Attachment 4 of Hydro One's OPDC MAAD prefiled application evidence

NOTE: Hydro One when seeking disposition of the ESM will propose a methodology to refund to customers