

September 15, 2017

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

Dear Ms. Walli:

RE: EB-2017-0049 – Hydro One Networks Inc. – Distribution Rate Application - 2018 -2022 - Issues List

We are representing the Consumers Council of Canada (“Council”) in the above-referenced proceeding. Pursuant to Procedural Order No. 1, dated August 30, 2017, these are the submissions of the Council regarding the draft Issues List distributed to all parties by Ontario Energy Board (“OEB”) Staff on September 8, 2017.

The Council submits that the draft issues List is sufficiently broad to allow intervenors to pursue most of the issues relevant to Hydro One Networks Inc.’s (“HON”) Application. The Council suggests the following changes:

1. Issues 22-31 deal specifically with the Distribution System Plan. Although Issue 28 deals with the planning and pacing of the capital expenditures for the plan term, there is no explicit issue addressing whether the proposed overall capital expenditure levels over the term of the plan are appropriate. This is an important issue for the Council. This may be implicitly captured in the other issues, but for clarity we propose that Issue 28 be amended in the following way: “Are the proposed capital expenditures resulting from the Distribution System Plan appropriate, and have they been adequately planned and paced?”
2. Since the HON Application was filed the Government of Ontario has put in place the Fair Hydro Plan. The Council submits that there may be implications arising from the implementation of the Fair Hydro Plan that could impact HON’s Application. An example would be whether HON’s load forecast should be adjusted in light of the Fair Hydro Plan. In addition, there may be impacts on HON’s working capital requirements arising from the implementation of the Fair Hydro Plan. The Council is also interested in assessing how, once rates have been determined by the OEB, the Fair Hydro Plan is applied when billing customers. We submit these are important issues for the OEB to consider in the context of this application. We suggest that the following issue be added to the list: “Are there implications arising from the implementation of the Fair Hydro Plan on HON’s proposed revenue requirements and load forecasts?” We also propose the following issue: “What are the final bill impacts for customers taking into account HON’s Application and the implementation of the Fair Hydro Plan?”

The Council acknowledges that the OEB has not scheduled a Settlement Conference for this proceeding. The Council is of the view, however, that there may be value in scheduling an Issues Conference,

following the Technical Conference, to potentially forge an agreement amongst parties as to what issues could be considered through a written hearing process. There may be issues that do not require cross-examination by parties. We believe this addition to the process could potentially streamline the oral hearing.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC:

All Parties