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September 21, 2017

VIA RESS AND COURIER

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

Dear Ms. Walli:

RE: EB-2017-0049 – Hydro One Networks Inc. (“Hydro One”) Distribution Rate Application 2018-2022 (the “Application”) Reply submissions on Draft Issues List

Hydro One has reviewed Board Staff’s submission dated September 20, 2017. These additional reply comments are limited and concern only Staff’s new proposal to include the following issue:

“Does Hydro One’s First Nation and Métis Strategy sufficiently address the unique rights and concerns of Indigenous customers?”

At present, the draft issues list is extensive, covering more than 57 issues. Captured issues generally address topical areas of inquiry, as opposed to being framed to address specific exhibits or sections of the Application.

Staff’s comments regarding the need for its additional issue do not address Hydro One’s proposal, namely, that Issue 22 is rephrased to be consistent with the language used in EB-2016-0160:

“Were Hydro One’s customer engagement activities sufficient to enable customer needs and preferences to be considered in the formulation of its proposed spending?”

Hydro One submits that adopting this approach would forego the need in having the additional issue added. Adopting the rephrased Issue 22 also maintains consistency with the approach taken in the List of Issues and would allow relevant aspects of Hydro One’s First Nation and Métis Strategy to be considered in proper context: identification of customer needs and preferences and how these have informed the relief sought in this proceeding.

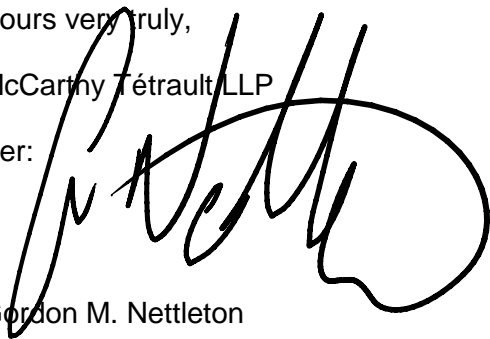
As stated in Hydro One’s submission on September 20, 2017, Hydro One’s First Nations and Métis Strategy is a corporate wide policy document whose reach extends beyond matters of rate relief sought in the Application. While the information obtained through the strategy on Indigenous customer needs and preferences and the overall cost of the strategy may have bearing on this Application, Hydro One is not seeking Board approval of the specific strategies it employs to achieve various corporate wide objectives on First Nations and Métis issues. Testing

“sufficiency” or appropriateness of specific strategies and initiatives, as might be implied by the wording of Staff’s proposed issue, falls beyond the scope of this application and should not be the subject of review in this proceeding.

Yours very truly,

McCarthy Tétrault LLP

Per:



Gordon M. Nettleton

cc: All Parties – EB-2017-0049