

November 10, 2017

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

Dear Ms. Walli:

**Re: EB-2017-0024 – Alectra Utilities Inc. 2018 Rates – Submissions on Process**

We are representing the Consumers Council of Canada (“Council”) in the above-referenced proceeding. In its Procedural Order No. 1, dated September 15, 2017 (revised), the Ontario Energy Board (“OEB”) requested that in the event there was not a Settlement Proposal arising from the Settlement Conference, parties may make submissions regarding which issues should be considered through a written hearing process and which issues should be subject to an oral hearing process. These are the submissions of the Council regarding these procedural issues.

The Council submits that with respect to the revised draft Issues List all of the issues that deal with the application of the Incremental Capital Module (“ICM”) for the PowerStream, Brantford and Enersource rate zones should, in our view, be dealt with through an oral hearing process. This is the first time a merged utility has applied for ICM relief on the basis of its multiple rate zones. These are potentially complex issues. It is important that there be a complete evidentiary record in this case which can be best accomplished through an oral hearing process.

The Council, along with other intervenors and OEB Staff, made submissions to the OEB on November 3, 2017, requesting that Alectra’s adoption of a new capitalization policy for the Horizon Rate Zone be included as an issue in the proceeding. To the extent the OEB accepts that this issue is in scope, the Council submits that it should also be considered through an oral hearing process. The impact on rates could be significant.

If the OEB decides not to proceed with an oral hearing process, the Council is of the view that a Technical Conference would be required. A further step in the discovery process would assist in providing a more complete evidentiary record.

Please feel free to contact us if you have any questions.

Yours truly,

*Julie E. Girvan*

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CC: Alectra, Regulatory Affairs  
C. Smith, Torys  
All parties