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Our File No. 183736

VIA RESS, EMAIL AND COURIER

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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Attention: Kirsten Walli,
Board Secretary

Dear Ms. Walli:

Re: EB-2018-0016: Alectra Utilities, 2019 EDR Application; Written or Oral Hearing

BOMA is writing to advise the Board of the issues in this case (on which no settlement was reached), which are appropriately considered in written submissions or in an oral hearing.

ICM Investments

Alectra has proposed five (5) ICM investments. BOMA suggests that the "Barrie feeder transfer", "Bathurst extensions", "replacement of leaking transformers", and "Rometown" proposals should be the subject of written submissions, as sufficient facts are on the record. YRRT (PowerStream) would benefit from an oral hearing, because the record is somewhat confused, as a result of frequent changes in the annual 2019 budgets, the extent to which some of the proposed YRRT capital expenditures are included in PowerStream's most recent Distribution System Plan, and the absence of evidence on what efforts Alectra has made to negotiate a fair cost sharing regime with the YRRT Corporation.

Other Issues

With respect to the impact of the revised Capitalization Policy on deferral account balances, in particular the proper method of calculation of the revenue requirement impact of changes in PILs, BOMA suggests that Alectra file on the record the table requested by Schools, which

compares the two different calculation approaches. If Alectra were to do that, that issue could be dealt with in written submissions.

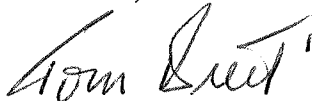
The impact of the new Capitalization Policy on Horizon's earnings needs to be addressed in an oral hearing, as Alectra's calculation seems too low. Horizon has declined to fully answer questions relating to how the earnings were calculated, in light of the capitalization policy change.

In addition, BOMA supports Schools' request for additional discovery.

Finally, if the Board were to determine that one or more of the issues BOMA suggests be dealt with by written submissions, should be dealt with in oral hearing. BOMA reserves the right to cross-examine on such issues.

Yours truly,

FOGLER, RUBINOFF LLP



Thomas Brett

TB/dd

cc: All Parties (*via email*)