

October 31, 2018

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

Dear Ms. Walli:

Re: EB-2018-0016 – Alectra Utilities Corporation – 2019 Rates

Alectra Utilities Corporation (Alectra) filed an Application with the Ontario Energy Board (OEB) on June 7, 2018, seeking approval for rates to be effective January 1, 2019. On October 16 and 17, 2018, Alectra and the intervenors participated in a Settlement Conference to deal with the issues in this case. Alectra filed a letter on October 24, 2018, informing the OEB that the parties were unable to reach a settlement.

In accordance with Procedural Order No. 2, dated September 24, 2018, these are the submissions of the Consumers Council of Canada (Council) regarding the issues to be considered by the OEB in the case and whether they should be the subject of a written or oral hearing process.

The OEB, in Procedural Order No. 2 determined that cost awards would be available for the following three issues:

- The balances and disposition of the deferral accounts related to the change in capitalization policy for each of the Brampton and Enersource rate zones;
- The earnings sharing mechanism (ESM) for the Horizon rate zone, including the effect on it from the change in capitalization policy; and
- The incremental capital modules (ICMs) for each of the Enersource and PowerStream rate zones.

With respect to the ICMs for the Enersource and PowerStream rate zones the Council is prepared to make written submissions. If however, the OEB determines that these issues are best considered through an oral hearing process the Council reserves its right to cross-examine.

With respect to the other two issues we agree with OEB Staff that these issues should be considered in the context of an oral hearing. These are complicated issues and the Council is of the view that the evidence related to these issues needs to be tested and clarified. In our view, the record as it now stands, is not sufficient for the OEB to consider these issues.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC: All parties