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Frank D'Andrea Vice President Regulatory Affairs

BY COURIER

November 23, 2018

Ms. Kirsten Walli Board Secretary Ontario Energy Board Suite 2700, 2300 Yonge Street P.O. Box 2319 Toronto, ON, M4P 1E4

Dear Ms. Walli,

B2M LP Updated Revenue Requirement and Supporting Schedules

Please find attached the updated revenue requirement and supporting schedules for B2M Limited Partnership ("B2M LP"), reflecting the revised Cost of Capital parameters released by the Board on November 22, 2018.

Exhibit	Title
1.0	Revenue Requirement Summary
1.1	Operations, Maintenance & Administration (OM&A) Expenses
1.2	Rate Base and Depreciation
1.3	Capital Expenditures
1.4	Capital Structure and Return on Capital
1.4.1	Cost of Long Term Debt Capital
1.5	Income Tax

The schedules reflect the Board's direction to include the reimbursement of the approved startup costs over a four year period. The 2019 allotment is \$1.925 million.

On May 3, 2018, B2M LP received a Decision from the Board approving its application for changes to its transmission revenue requirement effective January 1, 2018. The approval was for a Revenue Requirement of \$35.9M. However, interim transmission rates instituted for January 1, 2018 included revenue allotment for B2M LP of \$37.5M meaning that B2M LP was set to collect \$1.6M of revenue in excess of its approved amount. The Board decision, agreed to by all parties, stipulated that since the \$1.6M difference in revenue requirement is not material to the overall Uniform Transmission Rates ("UTR"), B2M LP should continue to receive the interim



revenue for 2018 based upon the \$37.5M revenue and return the \$1.6M difference in its next update.¹ The credit to revenue for this amount is included in Exhibit 1.0.

Otherwise, there are no other materially noteworthy items included in this update beyond the mechanistic updates resulting from the Cost of Capital parameters update from the Board.

B2M LP also notes that there is unlikely to be sufficient time to issue an Order or Orders fixing final rates for January 1, 2019 implementation. Therefore, B2M LP requests that Uniform Transmission Rates ("UTR") approved for 2019, be declared interim and include the \$32.8M requested herein.

An electronic copy has been filed using the Board's Regulatory Electronic Submission System.

Sincerely,

ORIGINAL SIGNED BY FRANK D'ANDREA

Frank D'Andrea

Submitting on behalf of B2M LP

Enc.

¹ EB-2017-0380, Decision and Order, Page 5-6

Update to Implementation of Decision with Reasons on EB-2015-0026

OM&A

(\$ millions)	Supporting Reference	B2M LP Proposed 2019	OEB Decision Impact 2019	Revised 2019
OM&A		1.55	(0.05)	1.50
OEB Decision Impact Supporting Details Adjustments	OEB Decision Reference			

•		
Reduction to encouage efficiency	Note 1	(0.05)

Note 1: The OEB imposed a reduction of \$50,000 on 2019 OM&A to encourage efficiency. See: EBOTH GORE, Decision issued December 29, 2015, Page 2, Paragraph 2

Update to Implementation of Decision with Reasons on EB-2015-0026

Rate Base and Depreciation

	Supporting Reference	B2M LP Proposed	OEB Decision Impact	Revised	
(\$ millions)		2019	2019	2019	
Rate Base	See supporting details below	495.6	-	495.6	
Depreciation		6.8	-	6.8	
OEB Decision Impact Supporting Details	Reference				
Working Capital Adjustment Rate Base Details Utility plant (average) Gross plant at cost Less: Accumulated depreciation Add: CWIP		547.7 (52.1)			
Net utility plant		495.6			
Working capital Cash working capital Materials & supplies inventory Total working capital					
Total Rate Base		495.6			

Update to Implementation of Decision with Reasons on EB-2015-0026

Capital Expenditures

	Supporting	B2M LP Proposed	OEB Decision Impact	Revised
(\$ millions)	Reference	2019	2019	2019
Capital expenditures		-	-	-

B2M LP Inc. Update to Implementation of Decision with Reasons on EB-2015-0026

Capital Structure and Return on Capital

(\$ millions) Return on Rate Base	Supporting Reference		B2M LP roposed 2019	OE	B Decision Impact 2019	OEE	Approved 2019	Co	ost of Capital Update 2019 Note 1		Revised 2019 Note 1
Rate Base	Exhibit 1.2	\$	495.6	\$	-	\$	495.6	\$	-	\$	495.6
Capital Structure: Third-Party long-term debt Deemed long-term debt Short-term debt Common equity		·	56.0% 0.0% 4.0% 40.0%	·	0.0% 0.0% 0.0% 0.0%	•	56.0% 0.0% 4.0% 40.0%	·	0.0% 0.0% 0.0% 0.0%	·	56.0% 0.0% 4.0% 40.0%
Capital Structure: Third-Party long-term debt Deemed long-term debt Short-term debt Common equity	Exhibit 1.4.1	\$\$\$ \$	277.5 - 19.8 198.2 495.6	\$	- - -	\$ \$ \$	277.5 - 19.8 198.2 495.6	\$	- - -	\$ \$ \$	277.5 - 19.8 198.2 495.6
Allowed Return: Third-Party long-term debt Deemed long-term debt Short-term debt Common equity	Exhibit 1.4.1 Exhibit 1.4.1		5.16% 5.16% 4.71% 10.08%		(3.36%) (3.36%) 0.02% (0.07%)		1.80% 1.80% 4.73% 10.01%		(0.00%) (0.00%) (1.91%) (1.03%)		1.80% 1.80% 2.82% 8.98%
Return on Capital: Third-Party long-term debt Deemed long-term debt Short-term debt Total return on debt		\$ \$ \$	14.3 - 0.9 15.3	\$	(9.3) - 0.0 (9.3)	\$ \$	5.0 - 0.9 5.9	\$ \$	(0.0) - (0.4) (0.4)	\$ \$	5.0 - 0.6 5.5
Common equity		\$	20.0	\$	(0.1)	\$	19.8	\$	(2.0)	\$	17.8

Note 1: The Cost of Capital is updated to reflect OEB approved parameters issued on XXXX.

Update to Implementation of Decision with Reasons on EB-2015-0026

Cost of Long-Term Debt Capital

Offering	Coupon	Maturity	Principal Amount	Premium Discount and	Total	Price Per \$100 Principal	Effective		Amount_ anding		Carrying	Embedded Cost
Date	Rate	Date	Offered	Expenses	Amount	(\$)	Cost Rate	12/31/2018	12/31/2019	Average	Cost	Rate
30-Jun-15	1.64%	30-Apr-20	293.3	1.0	292.3	99.64	1.72%	281.3	277.2	279.3	4.8	
								281.3	277.2	279.3	4.8	-
					Add	d: Treasury C	OM&A Costs				0.1	
					Add: Other	Financing R	elated Fees				0.1	
							Total			279.3	5.0	1.80%

Update to Implementation of Decision with Reasons on EB-2015-0026

Income Tax

(\$ millions)	s) Supporting Reference		B2M LP Proposed 2019	OEB Decision Impact 2019	OEB Approved 2019	Cost of Capital Update 2019	Revised 2019
Income Taxes	See supporting	details below	1.1	(0.0) 1.1	(0.3)	0.8
Income Tax Supporting Details							
Rate Base	Exhibit 1.2	(a)	\$ 495.6	\$-	\$ 495.6	\$-	\$ 495.6
Common Equity Capital Structure Return on Equity	Exhibit 1.4	(b) (c)	40.0% 10.08%		40.0% 10.01%		40.0% 8.98%
Return on Equity Regulatory Income Tax		(d) = a x b x c (e) = I	20.0 1.1	(0.2) 19.8 1.1	(2.0) (0.3)	17.8 0.8
Regulatory Net Income (before tax)		(f) = d + e	21.1	(0.2) 20.9	(2.3)	18.6
Timing Differences		(g) Note 1	(14.2)	-	(14.2)	-	(14.2)
Taxable Income		(h) = f + g	6.9	(0.2) 6.8	(2.3)	4.5
Taxable Income Allocated to Taxable Partners Tax Rate Income Tax CMT Credit Utilized Regulatory Income Tax		Note 2 (i) (j) = h x i (k) Note 3 (l) = j + k	4.9 26.50% 1.3 (0.2) 1.1	-	4.8 26.50% 1.3 (0.2) 1.1	0.00% (0.4) <u>0.2</u> (0.3)	3.2 26.50% 0.9 (0.0) 0.8

	B2M LP Proposed 2019	OEB Decision Impact 2019	OEB Approved 2019	Cost of Capital Update 2019	Revised 2019
Note 1. Book to Tax Timing Differences Depreciation	6.8	-	6.8	-	6.8
CCA	(21.0)	-	(21.0)	(0.0)	(21.0)
Note 2. Amount to Allocate to Taxable Partners					
Taxable Income	6.9		6.8		4.5
Less Income Tax in Rates	(1.1)		(1.1)		(0.8)
Mulitply by Ownership Share of Taxable Partners	65.81%		65.81%		65.81%
Taxable Income Allocated to Taxable Partners	3.8		3.7		2.4
Add Taxes in Rates	1.1		1.1		0.8
Taxable Income Allocated to Taxable Partners	4.9		4.8		3.2
Note 3. Corporate Minimum Tax					
Opening CMT Credit Carryforward	1.1		1.1		1.1
CMT Credit Utilized	(0.2)		(0.2)	_	(0.0)
Closing CMT Credit Carryforward	0.9		0.9		1.1
Regulatory Net Income (before tax)					18.6
Less Income Tax in Rates					(0.8)
					17.8
Mulitply by Ownership Share of Taxable Partners				_	65.8%
Regulatory Net Income allocated to Taxable Partners					11.7
Add: Income Taxes in rates				—	0.8
Multiply by CMT Rate					2.7%
CMT payable				_	0.3
Ontario taxes payable					0.4
CMT in excess of Ontario tax / (CMT Credit Utilized)					(0.0)