May 1, 2019

Ontario Energy Board

P.O. Box 2319

27 - 2300 Yonge Street

Toronto ON M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

**North Bay (Espanola) Acquisition Inc.**

**MAAD’s Application (EB-2019-0015)**

**Notice of Motion**

I am an intervenor in the above-noted MAAD’s application. Please find enclosed my request to bring a motion under Section 27.03 of the OEB’s *Rules of Practice and Procedure*.

I have submitted the document using the OEB RESS system and sent electronic copies to North Bay (Espanola) Acquisition Inc. Borden Ladner Gervais LLP, Espanola Regional Hydro Distribution Corporation, Damiani Law, Andrew Pietrewicz and Michael Millar.

Yours truly,

D. D. Rennick, CPA CA

392 Surrey Drive

North Bay, ON P1C 1E3

(705) 476- 2007 (705) 845-7345

ddrennick@cogeco.ca

May 1, 2019 EB-2019-0015

Ontario Energy Board

**North Bay (Espanola) Acquisition Inc. (Applicant)**

**MAAD’s Application (EB-2019-0015)**

NOTICE OF MOTION

D. D. Rennick (Rennick) will make a motion to the Ontario Energy Board (Board) on a date and time to be fixed by the Board. Rennick has no preference in the method of hearing his motion.

THE MOTION IS FOR:

1. An order requesting that the Applicant provide more fulsome responses and additional explanations to the interrogatories that were recently submitted in conjunction with the above-noted application.

THE GROUNDS FOR THE MOTION ARE:

1. On May 29, 2019 after receiving and considering the interrogatories received from the Applicant, it was determined that some of the responses were incomplete, did not completely address the question asked or misinterpreted the information provided in the preamble to the question.

2. Responses that answer the interrogatories more directly would provide the Board with additional information and provide a clearer understanding of the harm that Rennick is suggesting will come to North Bay Hydro customers if the Board is inclined to approve this application.

3. The responses that are of interest are DDR-1 (a), (b), DDR-2 (b), DDR-3, DDR-4, DDR-5, DDR-7, DDR-8, DDR-11, DDR-12, DDR-13, DDR-14, DDR-15, DDR-16 (a), (b) and DDR-17 (a)

The documentary material and evidence that will be relied upon at the hearing of the motion will be the records in EB-2019-0015 and such further material as the Board may permit.

D. D. Rennick, CPA CA

Intervenor