



Reply to the Attention of: Mike Richmond  
Direct Line: 416.865.7832  
Email Address: mike.richmond@mcmillan.ca  
Our File No.: 267730  
Date: July 22, 2019

## BY RESS AND COURIER

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
26th Floor, Box 2319  
Toronto, ON M4P 1E4

Dear Mrs. Walli,

**Re: EB-2019-0018  
Process for Intervenor Evidence**

In reviewing Procedural Order #1 issued in EB-2019-0018, it is not clear at what point in the process intervenors should be submitting their own Intervenor Evidence.

MANA, an intervenor in this proceeding, may wish to submit its own competing evidence for the benefit of the Board's review and consideration.

Such evidence is not at this time expected to including any Expert Evidence, but rather is more likely to include information within the possession and knowledge of MANA itself, and possibly other large Alectra customers similar to MANA with whom MANA has a commercial relationship.

Without limiting the evidence that MANA could choose to submit, such evidence could include, for example, affidavits and supporting documentation relating to:

- such customers' electricity consumption and spending;
- information relating to the services and service levels delivered by Alectra to such customers and the impact of such service levels on customer preferences;
- the impact of adverse weather events on MANA's electricity consumption and service levels;

- financial information relating to the businesses of such customers;
- their market sensitivity to electricity distribution cost changes;
- the impact of electricity distribution cost changes on their competitiveness;
- the impact of electricity distribution cost changes on operation and growth plans;
- any wider impact on the local, provincial or national economy;
- the degree to which MANA was consulted by Alectra during development of its proposal;
- the degree to which information was provided to MANA to assist them in understanding Alectra's proposal, if any; and
- such other information, data or documentation as MANA believes are material or helpful to the Board once Alectra's responses to interrogatories have been considered.

Could the Board please advise at what stage in the process as currently outlined, intervenors may submit their own evidence? If not evident from the timetable in Procedural Order #1, we ask that the Board consider updating the Procedural Order to set out an appropriate deadline for the submission of such intervenor evidence.

Yours truly,



Mike Richmond