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**Joanne Richardson**  
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BY COURIER

November 4, 2019

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

Dear Ms. Long:

**EB-2018-0242: Hydro One Networks Inc. MAAD s.86 Share Purchase Application for Peterborough Distribution Inc. – Submission from Parties on Need for Oral Hearing**

This letter is in response to the Ontario Energy Board's ("OEB") correspondence dated October 28, 2019, in which submissions were sought from parties as to whether the above noted matter should proceed by way of written or oral hearing.

It is Hydro One Networks Inc.'s ("HONI") submission that this matter should not proceed to oral hearing and that it should proceed in writing. As outlined further below, the OEB has been provided with an extensive factual and technical record and an oral hearing is not required to understand the evidence better, fill in any gaps in the evidence, or test the evidence through cross-examination.<sup>1</sup>

The record in this proceeding involved the Applicants responding to two rounds of interrogatories answering approximately 400 interrogatories (including sub-parts), two complete days of examination at the technical conference (with some parties conducting examinations lasting several hours) and 21 further undertakings filed arising from the technical conference.<sup>2</sup>

The record is extensive with respect to information relevant to the OEB's MAAD's policies and includes aspects that extend beyond the scope of those policies such as rate information past the 10-year deferral period. The present record is sufficient for the parties to make submissions on the issues before the OEB and for the OEB to rule accordingly. In effect, either through interrogatories or examination, the parties have considered:

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<sup>1</sup> OEB, Procedural Order No. 3, Windlectric Inc. (EB-2014-0300), February 24, 2015, p. 4.

<sup>2</sup> In addition, HONI's expert from Navigant was made available for examination during the Technical Conference, but no party chose to ask the expert any questions. See Technical Conference Transcript, Vol 1, p. 7.

- OM&A and capital savings, status quo cost forecasts, residual OM&A, cost allocation, revenue to cost ratios, incremental costs, shared costs, tracking of costs, customer rates, transaction/transition costs, specific service charges, accounting policy (capitalization and depreciation), staffing, ESM, debt rate, economies of scale, deferral period, adjustment factors, income tax, reliability, load forecast, rate design.

There is no one remaining issue that is relevant to the no harm test which has not been sufficiently canvassed on the public record such that an oral hearing would be required.

In the event the OEB chooses to proceed directly to submissions in this matter, HONI suggests the following schedule:

- Applicant's argument-in-chief - November 22
- Intervenor and OEB Staff submission - December 6
- HONI reply submissions - December 20

An electronic copy of this has been filed through the Ontario Energy Board's Regulatory Electronic Submission System (RESS).

Sincerely,

ORIGINAL SIGNED BY JOANNE RICHARDSON

Joanne Richardson