

November 4, 2019

Christine Long
Registrar
Ontario Energy Board
2300 Yonge Street
P.O. Box 2319
Toronto, Ontario
M4P 1E4

Dear Ms. Long

Re: EB-2018-0242/0270 Hydro One Inc./Peterborough Distribution Inc./Orillia Power Distribution Corporation - MADDs Applications

I am a consultant to the Consumers Council of Canada (“Council”). We are intervenors in the above-referenced proceedings. In its letters dated October 28, 2019, the Ontario Energy Board (“OEB”) requested submissions from parties as to whether an oral hearing is required, given the record that now exists, or whether the process can proceed directly to written submissions.

We have reviewed the detailed submissions of the School Energy Coalition (“SEC”) regarding this matter and agree with those submissions. Specifically, as outlined by SEC, there are a number of issues that should be addressed through an oral hearing process. The Council does not believe that the current record is sufficient for the OEB to determine whether the Applications meet the “no harm” test. In addition, it is important that the evidence provided by Navigant Consulting be tested, something that has not yet happened as a part of these proceedings.

The Council is of the view that in order to consider the merits of these Applications, the OEB would clearly benefit from an oral hearing process. The Council’s participation in this proceeding would primarily focus on the “no harm” test and whether the Applicants have met the onus to demonstrate no harm.

Yours truly,

Julie E. Girvan

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CC: All Parties