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Frank D'Andrea

Vice President, Reliability Standards and Chief Regulatory Officer

BY EMAIL AND RESS

August 6, 2020

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,

**Re: EB-2019-0082 – Application for Transmission Revenue Requirement for 2020-2022 –
Objections to the claimed costs**

Hydro One has reviewed the cost claims filed by intervenors in the above-referenced proceeding. Hydro One has no objection to or concerns with the cost claims filed by many of the intervenors. Hydro One makes the following brief submissions in respect of the claims by BOMA and Michipicoten First Nation.

BOMA cost claim

BOMA's claim for preparation of argument (129.5 hours) is very high in consideration of the scope of BOMA's argument and in relation to the amounts claimed by other parties for the argument preparation category. The next highest claim in this category is SEC, whose argument was significantly broader in scope than BOMA's, at 112.7 hours. The average time claimed by all other parties for argument preparation is much lower: 33 hours.

Hydro One submits that given the foregoing, a reduction to BOMA's hours in this category is warranted. In Hydro One's last transmission proceeding, the OEB also concluded that BOMA's cost claim for argument preparation was excessive and reduced its claim in that category by 40 hours.¹ Hydro One submits that an appropriate reduction to bring BOMA's claim to a level more commensurate with other parties and with the scope of its argument is similarly warranted here.

¹ EB-2016-0160, Decision and Order on Cost Awards dated January 9, 2018 p 3.

Michipicoten First Nation cost claim

Michipicoten First Nation (MFN) claimed 4.6 hours for interrogatories and 25.25 hours for argument but did not file interrogatories or argument during the process, and did not otherwise actively participate in the hearing/proceeding. In its cost claim MFN has not, for purposes of sections 5(b) and 6.03 of the OEB's *Practice Direction on Cost Awards*, shown how its participation and the time incurred in these two cost categories contributed to a better understanding by the OEB of the issues in the process (or was necessary to incur). Hydro One submits that these hours claimed for interrogatories and argument should be removed from MFN's cost claim in the circumstances.

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

Sincerely,

A handwritten signature in cursive script that reads "Frank D'Andrea".

Frank D'Andrea