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Our File No. 191997

VIA RESS AND EMAIL

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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Attention: Christine E. Long,
Board Secretary

Dear Ms. Long:

Re: EB-2019-0082: Hydro One Networks Inc., Application for Electricity Distribution Rates for the Period from January 1, 2020 to December 31, 2022

BOMA is writing in response to HONI's letter of August 6, 2020, in which HONI proposes that BOMA's costs be reduced because BOMA spent 129.5 hours on argument (16.8 more hours than the 112.7 hours that SEC spent, which had the next highest number of hours for argument of the various intervenors); and because BOMA's Argument was narrower in scope. HONI further noted that the Board had reduced BOMA's cost claim in the last HONI Transmission case by an amount equivalent to 40 hours.

BOMA is of the view that HONI's proposed reduction is inappropriate. Like SEC, BOMA did not address every issue on the Issues List, but BOMA's argument was comprehensive, nuanced, and carefully constructed. BOMA's argument addressed all the major issues including rates and bill impacts, the size and nature of the capital budget, productivity improvements, customer engagement, prioritization of capital projects/programs, capital versus OM&A spending, benchmarking, earnings sharing, financial and profitability issues, capital adder (C-factor), the stretch factor, compensation, and capitalization practices. It is not unusual for SEC and BOMA to have among the larger cost claims in major cases because of the depth and breadth of their analyses.

While BOMA's argument was lengthy, it is worth noting that it was only about 15% of the length of HONI's reply argument of 254 pages. (HONI's Argument-in-Chief was an additional 123 pages).

Finally, BOMA suggests the fact that the Board had reduced BOMA's hours in a previous HONI case, is not relevant to the disposition of BOMA's cost claim in this case.

Yours sincerely,

FOGLER, RUBINOFF LLP

Thomas Brett

TB/dd

cc: All Parties (*via email*)