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August 20, 2020

Delivered by Email & RESS

Ms. Christine Long, Registrar and Board Secretary
Ontario Energy Board
P.O.Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: Espanola Regional Hydro Distribution Corporation 2021 Cost of Service
EB-2020-0020**

We are counsel to Espanola Regional Hydro Distribution Corporation (“Espanola Hydro”) in the above captioned proceeding and are writing in response to the letter filed by School Energy Coalition (“SEC”) dated July 29, 2020.

Espanola Hydro would like to reiterate that the purpose of its request of a modified approach to its cost of service application is to help reduce the financial burden on Espanola Hydro ratepayers and reduce the significant regulatory burden associated with the Application while ensuring that Espanola Hydro is put back on the right path with regards to its regulatory obligations. Espanola Hydro’s intention is to keep cost per customer as reasonable as possible while considering the OEB Filing Requirements and COS application process.

With respect to the various other issues raised by SEC in their letter, including their questions about Espanola Hydro’s rates, its ROE, details of its regulatory costs, and the production of the due diligence, Espanola Hydro submits that the Board does not need to and should not make a determination on any of these items at this time. Rather, the Board should wait until there is evidence filed by the Applicant. At that stage intervenors can pose any questions they wish regarding the evidence during the discovery process. The Board can then adjudicate the relevance and applicability of interrogatories with the benefit of a full factual record. It would be premature to attempt to adjudicate those issues before an application has even been filed.

At this stage, Espanola Hydro has limited its request to streamline the initial filing. It appears that SEC is supportive of that general objective. For this reason, we submit that the OEB should grant Espanola Hydro’s request.

Yours very truly,

BORDEN LADNER GERVAIS LLP

Per:

Flora Ho

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CC: Donald Rennick, Independent Participant
Wayne McNally, School Energy Coalition
Jay Shepherd, School Energy Coalition
Mark Rubenstein, School Energy Coalition
Mark Garner, Vulnerable Energy Consumers Coalition
Jane Scott, Ontario Energy Board
Jerry Wang, Ontario Energy Board