



PUBLIC INTEREST ADVOCACY CENTRE
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November 16, 2020

VIA E-MAIL

Christine E. Long
Registrar (registrar@oeb.ca)
Ontario Energy Board
Toronto, ON

Dear Ms. Long:

Re: EB-2020-0194 – Hydro One Networks Inc. Transmission Revenue Requirement and Distribution Revenue Requirement and Tax Issue – Future Tax Savings Evidence

Please find attached the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

Mark Garner
Consultants for VECC/PIAC

Email copy:

Eryn MacKinnon , Senior Regulatory Coordinator – Regulatory Affairs
Regulatory@HydroOne.com

REQUESTOR NAME	VECC
TO:	Hydro One Network Inc. (Hydro One)
DATE:	November 16, 2020
CASE NO:	EB-2020-0194
APPLICATION NAME	Deferred Tax Benefit

Exhibit A

VECC-1

Reference: Exhibit A, Tab 1, Schedule 1, page 1

- a) Please file the Decision of the Ontario Divisional Court with respect to the tax savings.
- b) Did Hydro One make any submissions in that case as to the appropriate carrying charges that should apply should it be (as it was) successful? If so please provide those arguments.

VECC-2

Reference: Exhibit A, Tab 1, Schedule 1, page 10

- a) Please file the *Alberta Utilities Commission Decision 790-D04-2016 - September 28, 2016*.

VECC-3

Reference: Exhibit A, Tab 1, Schedule 1, page 10

- a) Please explain what survey of Ontario Energy Board Decisions Hydro One made with respect to carrying costs to be applied for the recovery of monies collected by Utilities in error and later refunded to customers. Over what period was searched did Hydro One search for any precedent?
- b) Is Hydro One aware of any OEB regulated utilities who have made accounting errors (e.g. accounting for Group 1 deferrals, etc.) for which refunds to customers were later required? If so, what carrying charge was applied in those circumstances?
- c) In Hydro One's view should there be a difference as between the carrying charges applied by the OEB in the case where a regulated utility has made an error that requires a refund to customers and the carrying charge to be applied in these circumstances? If yes, please explain what principles apply and distinguishes as between these two circumstances.

VECC-4

Reference: Exhibit A, Tab 1, Schedule 1, Section 3.1.4

- a) What are the incremental annual carrying costs (based on Hydro One's carrying charge proposal) in a one-year recovery as compared to the three recovery options presented at section 3.14?

VECC-5

Reference: Exhibit A, Tab 1, Schedule 1, Section 3.1.4, Table 5

- a) Under recovery Option 1 in year 2022 Table 5 shows no Dx rate increase (0.0%) but a 0.3% Dx residential customer Bill Impact and a \$0.69 (\$) Impact. Similarly, in Tables 6 and 7 there are columns showing no rate impacts (for Dx and Tx) and yet for the same years there are Bill and \$ Impacts. Please explain why.

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