November 16, 2020

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

Dear Ms Long:

EB-2020-0194 – Hydro One Networks Inc. – Tax Savings Application

Please find, attached, interrogatories on behalf of the Consumers Council of Canada for Hydro One Networks Inc. pursuant to the above-referenced proceeding.

Please feel free to contact me if you have questions.

Yours truly,

Julíe E. Gírvan

Julie E. Girvan

CC: All parties

INTERROGATORIES FOR HYDRO ONE NETWORKS INC. - TRANSMISSION/DISTRIBUTION

FROM THE CONSUMERS COUNCIL OF CANADA

RE: EB-2020-0194 -TAX SAVINGS

CCC-1

Please provide all materials provided to HON's Board of Directors regarding this Application.

CCC-2

On July 16, 2020, the Divisional Court determined that no part of the benefit of the Future Tax Savings is allocable to ratepayers and should instead be paid to the shareholders in its entirety. Did Hydro One Networks Inc. (HON) make any submissions in the Divisional Court proceeding or any of the other OEB proceedings regarding carrying costs? If so, what were those submissions? Did the Divisional Court make any findings regarding carrying costs? If so, what were those findings?

CCC-3 Ex. A/T1/S1/p. 8 Please explain how the WACD rates were derived.

CCC-4

Re: Ex. A/T1/S1/pp. 10-11

The Alberta Utilities Commission in a previous case determined that a rate of interest equal to the Bank of Canada rate plus 150 basis points was an appropriate rate. Please recast Tables 2 and 3 to include this option. Why has HON not considered this option?

CCC-5

Ex. A/T1pp. 12-13

The evidence states that HON "expects" that R1 and R2 distribution customers will be protected from distribution rate increases associated with the recovery of Misallocated Tax Savings Amounts as a result of the distribution rate protection program. Under what circumstances would they not be protected?

CCC-6 Ex. A/T1/S1/pp. 12-15 Please confirm that the bill impacts are monthly impacts.

CCC-7 Ex. A/T1/S1/pp. 12-15 Please provide the rate and bill impacts for HON's Seasonal customers.

CCC-8

Is HON developing a communication strategy regarding the Misallocated Tax Savings Amounts? If not, why not? If so, please explain how HON intends to explain the recovery of the amounts to its customers.

CCC-9

Ex. A

Did HON consider an option whereby the carrying costs would be shared between HON's shareholders and HON's customers? If not, why not?