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December 23, 2020

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

Dear Ms. Long

**RE: EB-2020-0194 Hydro One Remittal of Future Tax Savings
Submission of Energy Probe in Support of SEC Motion**

On December 9, 2020, the School Energy Coalition (SEC) filed a motion requesting an order requiring Hydro One to provide full and adequate responses to the following interrogatories:

- a. Interrogatories SEC-2 through 6
- b. Interrogatory OEB Staff-2(a)(5)
- c. Interrogatory CCC-1

SEC additionally requested such further and other relief as it may request and the OEB may grant. On December 10, 2020, the OEB received a letter from Hydro One which set out Hydro One's position with respect to the issues raised in the motion. The OEB determined that it will hear the motion and issued Procedural Order No. 2 allowing parties in support of the SEC motion to file submissions by December 23. This is the submission of Energy Probe Research Foundation (Energy Probe).

Interrogatories SEC-2 to SEC-6

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In these interrogatories SEC requested information that would allow the OEB to decide if Future Tax Savings have been appropriately determined. Net present value of Future Tax Savings has been estimated to be \$1.2 billion or \$2.6 billion in total. This is not an insignificant amount. Hydro One has declined to provide information that would allow parties to see how it was calculated. By refusing to provide the responses to these interrogatories, Hydro One has created an impression that the information does not support the numbers that Hydro One has filed. This should be a cause for concern to the OEB. Energy Probe submits that the information requested by SEC is required to allow the OEB to reach a fair and reasonable decision.

Interrogatory OEB Staff-2(a)(5)

In this interrogatory OEB Staff requested information on the actual interest rates of Hydro One's borrowing for 2017-2022. Hydro One refused to provide this information because claiming that only OEB-approved interest rates are relevant to the issues in this proceeding. Energy Probe believes that actual interest rates are relevant to the central issue in this proceeding, which is the determination by the OEB of the appropriate carrying cost.

Interrogatory CCC-1

In this interrogatory, CCC asked Hydro One to file information presented to the Board of Directors of Hydro One regarding this application. By refusing to provide this information Hydro One has created a concern that the Board of Directors was presented with information that is not consistent with evidence in this proceeding. Energy Probe believes that Hydro One ratepayers that will be required to pay back a large amount of money to Hydro One shareholders should know on what basis the Board of Directors decided to proceed with the application and if the Board of Directors considered the impact on ratepayers.

For the reasons above, Energy Probe supports the SEC motion.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.
Consultant representing Energy Probe

cc. Patricia Adams (Energy Probe Research Foundation)
Frank D'Andrea (Hydro One)
Roger Higgin (Sustainable Planning Associates Inc.)
Gordon Nettleton (McCarthy LLP)
Jay Shepherd (Shepherd Rubenstein Professional Corporation)

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