

Elson Advocacy

February 11, 2021

BY EMAIL AND RESS

Ms. Christine Long

Board Secretary

Ontario Energy Board

2300 Yonge Street, Suite 2700, P.O. Box 2319

Toronto, Ontario M4P 1E4

Dear Ms. Long:

**Re: EB-2020-0265 – Hydro One Networks Inc. – Hawthorne to Merivale
Reconductoring Project**

I am writing to submit a renewed request to provide evidence in this proceeding based on proposed procedural steps that would eliminate any undue delay.

Although we would need to streamline the proposed evidence, Environmental Defence's proposed consultant could complete the evidence within seven business days after receiving the interrogatory responses. If responses are delivered by February 26th as planned, the evidence could be submitted by March 9th. We then would propose to deal with any discovery that Hydro One wishes to have by way of a technical conference on March 10th. If interrogatory responses can be provided before February 26th, this timeline could be advanced. I note that we submitted our interrogatories early.

Although this would move the technical conference by one week from March 3rd to March 10th, I cannot attend the technical conference on March 3rd in any event as I will be involved in the natural gas Integrated Resource Planning hearing. Allowing evidence under this proposal would require the schedule to change only very minimally from what it would be otherwise. Hydro One asked for a decision by May 15, 2021 to meet its targeted in-service date.¹ The provision of evidence would not jeopardize this in any way.

I understand that the Board noted in its procedural order that the further examination of alternatives can be adequately explored through the interrogatory process. However, we respectfully request the opportunity to provide brief submissions on that particular point. We do not believe we can adequately make our case without expert evidence. For example, the valuation of losses is a technical issue that requires technical expertise. Hydro One values its

¹ Exhibit B, Tab 1, Schedule 1, Page 3.

losses based only on the HOEP, which is different from other utilities.² This gets into questions around appropriate avoided cost methodologies, among other things. Hydro One has many engineers on staff. If we cannot submit evidence on this point, our chances of being able to convincingly make our case to the Board are considerably reduced. We believe a small adjustment to the schedule is worthwhile to allow this issue to be fairly and adequately canvassed. Most importantly, we believe the Board will benefit from hearing a different perspective on these important issues.

Yours truly,



Kent Elson

cc: Parties in the above proceeding

² For example, Hydro Ottawa (see EB-2019-0261, Interrogatory Response, IRR ED-3).