

April 19, 2021

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

Dear Ms Long:

**EB-2020-0043– North Bay Hydro – Disputed Issue**

We are consultants to the Consumers Council of Canada (“Council”) in the Ontario Energy Board (“OEB”) proceeding to consider the Application by North Bay Hydro Distribution Limited (“NBHDL”) for 2021 rates. In its Procedural Order No. 2, dated April 12, 2021, the OEB has allowed for submissions regarding whether Issue 5.3 - Is the Application fully consistent with the Decision of the OEB in 2019-0015? – should be included on the Issues List. The issue was proposed by the School Energy Coalition (“SEC”). The Council supports inclusion of the issue on the list.

In the EB-2019-0015 proceeding the OEB approved the acquisition by NBHDL of Espanola Regional Power Distribution Corporation (“ERPDC”). In that Decision although the OEB acknowledged that NBHDL and ERPDC would be filing separate cost of service applications for 2021, it indicated that there may be some near term efficiencies and improvements that the future OEB panel may want to explore. The panel also stated that it could not preclude the future OEB panel from considering these efficiencies in a rate application<sup>1</sup>.

The Council agrees with SEC that the proposal by the Applicant to exclude any consideration of the impact of the acquisition of ERPDC by NBHDL is not appropriate. The fact that both of these utilities are under common ownership is clearly relevant to the setting of 2021 rates for NBHDL. The impact of that common ownership on NBHDL’s costs should be within the scope of this proceeding. Accordingly, the Council urges the OEB to allow this issue to be included.

Yours truly,

**Julie E. Girvan**

Julie E. Girvan

CC: All parties

---

<sup>1</sup> EB-2019-0015 - OEB Decision and Order dated August 22, 2019, p. 25