

September 14, 2021

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

Dear Ms Long:

Re: EB-2021-0110 - OEB Proceeding – Hydro One Networks Inc. – Application for Approval of Transmission and Distribution Rates for the period 2023-2027

I am a consultant to the Consumers Council of Canada (“Council”). I have been instructed by my client to intervene in the proceeding to consider the Application by Hydro One Networks Inc. (“HON”) for approval of its distribution and transmission rates for the period 2023-2027. The Council is a public-interest entity which represents the interests of residential consumers in Ontario. The Board’s order in this proceeding will ultimately impact the rates that residential consumers pay for the distribution and transmission of electricity.

On March 15, 2020, the Council filed with the Board, pursuant to Rule 22.03 of the Ontario Energy Board’s Rules of Practice and Procedure, a document describing the Council, its mandate and objectives, membership, the constituency represented, and the types of activities the Council carries out. In addition, we provided a list of the individuals authorized to represent the Council in OEB proceedings.

The nature and scope of the Council’s intended participation in the proceeding will be the following:

1. To test and assess HON’s evidence regarding its proposed rates and charges. Specifically, the Council will focus on the proposed revenue requirement, revenue forecasts, cost allocation and rate design, and the creation of, and clearance of, deferral and variance accounts;
2. To review the Distribution System Plan and the Transmission System Plan and the proposed capital spending derived from those plans; and
3. To participate in the various aspects of the proceeding which may include an interrogatory process, a technical conference, a settlement conference and a hearing.

The Council intends to ask for an order of costs in this proceeding. The Council has participated in many electricity proceedings over a long period of time. Specifically, the Council has participated in all previous HON transmission and distribution proceedings and has been recognized as being eligible for an award of costs. In the absence of an award of costs the Council would be unable to participate in this proceeding.

The Council is of the view that an oral hearing is appropriate for this proceeding given the extensive nature of the Application. There may be certain aspects of the proceeding that could be dealt with through a written process, but this determination should not be made until the interrogatory process is complete.

Copies of all correspondence related to this proceeding be sent to the following consultant:

Julie Girvan
62 Hillside Avenue East
Toronto, ON
M4S 1T5
jgirvan@uniserve.com

Please let us know if any further information from the Council is required at this time.

Yours truly,

Julie E. Girvan

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CC: HON, Regulatory Affairs
Ken Whitehurst, Consumers Council of Canada