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#### Kathleen Burke

Director, Applications Delivery Regulatory Affairs

BY EMAIL AND RESS

September 17, 2021

Ms. Christine E. Long Registrar Ontario Energy Board Suite 2700, 2300 Yonge Street P.O. Box 2319 Toronto, ON M4P 1E4

Dear Ms. Long:

EB-2021-0033 - Hydro One Networks Inc. - 2022 Distribution Rate Application for the Areas Formerly Served by Norfolk Power Distribution Inc., Haldimand County Hydro Inc., and Woodstock Hydro Services Inc.

EB-2021-0050 - Hydro One Networks Inc. - 2022 Distribution Rate Application for the Areas Formerly Served by Orillia Power Distribution Corp. and Peterborough Distribution Inc.

In the OEB's letters of direction for the above-noted annual rate updates, Hydro One has been directed to serve notice on intervenors from the following proceedings:

- The MAADs applications for each of Norfolk Power Distribution Inc. (Norfolk) (EB-2013-0187), Woodstock Hydro Services Inc. (Woodstock) (EB-2014-0213), Haldimand County Hydro Inc. (Haldimand) (EB-2014-0244) on the one hand, and Peterborough Distribution Inc. (Peterborough) (EB-2018-0242) and Orillia Power Distribution Corporation (Orillia) (EB-2018-0270) on the other;
- Hydro One Distribution's last rate application (EB-2017-0049);
- Hydro One's upcoming Transmission and Distribution rate application (EB-2021-0110).

Appendix A includes a list of all intervenors from these proceedings. This will require service on 44 intervenors for EB-2021-0033 (Norfolk, Woodstock, Haldimand) and 45 intervenors for EB-2021-0050 (Peterborough and Orillia).

For the reasons set out below, Hydro One requests that Notice requirements be amended to include intervenors in the MAADs applications. In the alternative, Hydro One requests that Notice requirements be amended to include intervenors in the MAADs applications and the last cost of service applications for each of Norfolk, Woodstock, Haldimand, Peterborough and Orillia. To do otherwise would require service on an overly broad group of intervenors and could cause confusion and frustration for some of the proposed intervenors. Furthermore, Hydro One's proposal would ensure regulatory efficiency.



### Service on Intervenors from Hydro One's Last Rate Application (EB-2017-0049)

Hydro One requests that the OEB revisit the need to use the list of intervenors from EB-2017-0049 for service of Notice of the annual rate updates for Norfolk, Woodstock, Haldimand, Peterborough and Orillia.

Intervenors in EB-2017-0049 should be excluded. Many of them made submissions specific to standalone issues unrelated to the rates for Norfolk, Woodstock, Haldimand, Peterborough and Orillia. For example, telecom companies and cottage associations who made submissions on the pole attachment rate and the seasonal rate class, respectively. Some of these intervenors have no interest in the forthcoming annual rate updates and serving notice may lead to confusion or frustration.

The customers of Norfolk, Woodstock, Haldimand, Peterborough and Orillia were not impacted by the rates derived in EB-2017-0049.

# Service on Intervenors in Hydro One's Upcoming Joint Rate Application for Transmission and Distribution (EB-2021-0010)

Hydro One does not yet have a final list of intervenors in the above noted proceeding. Notwithstanding that, intervenors to the Joint Rate Application for Transmission and Distribution should be excluded from the Notice provisions in EB-2021-0033 and EB-02021-0050, particularly those intervening on standalone issues unrelated to the rates for Norfolk, Woodstock, Haldimand, Peterborough and Orillia (i.e. seasonal rates or Transmission).

Rates for Peterborough and Orillia are frozen for 2023-2027 period and customers of those utilities will not be impacted by the rates derived in EB-2021-0110.

By participating in the respective MAADs proceedings, intervenors indicated their interest in the rates of Norfolk, Woodstock, Haldimand, Peterborough and Orillia specifically. Service on these intervenors is appropriate and sufficient to allow meaningful participation in this proceeding.

Hydro One requests that the OEB reconsider the list of intervenors for service of Notice of the proceedings in EB-2021-0033 and EB-2021-0050.

Sincerely,

Kathleen Burke

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## Appendix A – List of All Intervenors from Applicable Proceedings

Proposed for Inclusion	
Proposed for Exclusion	

### **Intervenors from MAADs**

Norfolk	Woodstock	Haldimand	Peterborough	Orillia
(EB-2013-0187)	(EB-2014-0213)	(EB-2014-0244)	(EB-2018-0242)	(EB-2018-0270)
Consumers Council	School Energy	School Energy	Consumers Council of	Consumers Council of
of Canada (CCC)	Coalition (SEC)	Coalition (SEC)	Canada (CCC)	Canada (CCC)
Essex Powerlines	The Corporation of	Independent	Energy Probe Research	Energy Probe Research
Corporation	the Township of	Participant	Foundation (Energy	Foundation (Energy
Horizon Utilities	Zorra		Probe)	Probe)
Corporation	Concerned Citizens		International	Power Workers' Union
School Energy	Against the Sale of		Brotherhood of Electrical	(PWU)
Coalition (SEC)	Woodstock Hydro		Workers, Local 636	School Energy Coalition
Vulnerable Energy			Power Workers' Union	(SEC)
Consumers Coalition			(PWU)	Vulnerable Energy
(VECC)			Save PDI Coalition	Consumers Coalition
			School Energy Coalition	(VECC)
			(SEC)	Independent
			Vulnerable Energy	Participant
			Consumers Coalition	Independent
			(VECC)	Participant
			Independent Participant	Independent
				Participant



### Intervenors from Hydro One's Previous Distribution Application (EB-2017-0049)

EB-2017-0049 – Hydro One Distribution	Comments
Arbourbrook Estates	HONI Dx specific intervenor
AMPCO	Not in MAADs
Anwaatin Inc.	Not in MAADs
Balsam Lake Coalition	HONI Dx specific intervenor - Seasonal Rates
BOMA	Not in MAADs
Cable Cable Inc.	HONI Dx specific intervenor - Pole attach rates
Canadian Cable Systems Alliance Inc.	HONI Dx specific intervenor - Pole attach rates
CCC	Per MAADS above for Norfolk, Peterborough and Orillia
City of Hamilton	HONI Dx specific intervenor
CME	Not in MAADs
Cogeco Connexion Inc.	HONI Dx specific intervenor - Pole attach rates
Doyle Salewski Inc.	HONI Dx specific intervenor
EastLink	HONI Dx specific intervenor - Pole attach rates
Energy Probe	Per MAADS above for Peterborough and Orillia
IESO	HONI Dx specific intervenor
Independent Telecommunications Providers Association	HONI Dx specific intervenor - Pole attach rates
Ontario Sustainable Energy Association - OSEA	HONI Dx specific intervenor
PWU	Per MAADS above for Peterborough and Orillia
Quebecor Media	HONI Dx specific intervenor - Pole attach rates
Quinte Manufacturers Association (QMA)	HONI Dx specific intervenor
Rice Lake Tourist Association	HONI Dx specific intervenor - Seasonal Rates
Rogers Communications	HONI Dx specific intervenor - Pole attach rates
SEC	Per MAADS above for Norfolk, Haldimand, Woodstock,
Change Communications Inc.	Orillia and Peterborough
Shaw Communications Inc.	HONI Dx specific intervenor - Pole attach rates Not in MAADs
Society of United Professionals Sunset Bay Road Cottagers	
Sustainable Infrastructure Alliance of Ontario	HONI Dx specific intervenor - Seasonal Rates HONI Dx specific intervenor
Union Gas Limited	HONI Dx specific intervenor
VECC	Per MAADS above for Norfolk, Peterborough and Orillia
VECC	rei MAADS above for Nortolk, Peterborough and Offilla



### Draft List of Intervenors from Hydro One's Joint Rate Application (EB-2021-0110)

EB-2021-0110 - JRAP	Comments
Anwaatin Inc.	See EB-2017-0049
AMPCO	See EB-2017-0049
CME	See EB-2017-0049
CUSW	Not in MAADs
CCC	See EB-2017-0049
Distributed Resource Coalition (DRC)	HONI Dx specific intervenor
Energy Probe	See EB-2017-0049
ENWIN	Not in MAADs
Essex Powerlines	Participated in Norfolk MAADs
Ice River Sustainable Solutions (IRSS)	Not in MAADs
IESO	See EB-2017-0049
LPMA	Not in MAADs
Ontario Federation of Agriculture (OFA)	Not in MAADs
Ontario Power Generation Inc. (OPG)	Not in MAADs
Pollution Probe	Not in MAADs
PWU	See EB-2017-0049
Quinte Manufacturers Association (QMA)	See EB-2017-0049
Richard Gruchala	HONI Dx specific intervenor - Seasonal Rates
SEC	See EB-2017-0049
SUP	See EB-2017-0049
VECC	See EB-2017-0049