



September 28, 2021

Ms. Christine E. Long  
Registrar & Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Re: EB-2021-0110 Hydro One Networks Inc. 2023-2027 Joint Transmission & Distribution Rate Application  
Need for a Blue Page Update

Dear Ms. Long:

I am writing pursuant to the Board's Procedural Order No. 1 dated September 17, 2021, to advise the Board of AMPCO's view that a blue page update as part of this application is required. Final actual data from 2021 will become available during this proceeding and thus it needs to be taken into consideration. 2021 actuals (the latest actuals that will be available) reflect key data points needed to inform the inputs to the revenue requirement, which will be set on a cost of service basis in 2023 and used as the foundation and starting point to calculate the rates for the subsequent four years 2024 to 2027.

Hydro One's joint application is a complex five-year application incorporating both the distribution and transmission businesses. Making provisions now to incorporate 2021 actuals means that more information will be available regarding the impacts of COVID-19 on staffing, the load forecast, and distribution and transmission capital plans, all key inputs to calculating and updating distribution and transmission revenue requirements. The Board noted in its 2020-2022 Transmission Decision (EB-2019-0082), "The severity and duration of the current COVID-19 emergency, which has occurred after the close of the record in this proceeding, and its impact on electricity utilities (i.e., transmitters) and customers alike, is uncertain." (Decision and Order April 23, 2020 Page 5). AMPCO submits incorporating 2021 actuals into this proceeding through a blue page update reduces the level of uncertainty with respect to the impacts of COVID-19.

Best Regards,

A handwritten signature in blue ink, appearing to read "Colin Anderson".

Colin Anderson  
President

Copy to: Hydro One Networks Inc.

**Association of Major Power Consumers in Ontario**

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