

September 28, 2021

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

Dear Ms Long:

**EB-2021-0110 - Hydro One Networks Inc. – Transmission and Distribution Rate Application – 2023-2027**

We are representing the Consumers Council of Canada (“Council”) in the above-referenced proceeding. On September 17, 2021, the Ontario Energy Board (“OEB”) issued its Procedural Order No. 1. In that P.O. the OEB invited submissions on a number of issues related to the proceeding. These are the submissions of the Council regarding those issues.

**Blue Page Update:**

HON has indicated that it could file a “blue page update” to the pre-filed evidence to reflect 2021 actuals. The update could be filed in April 2022. If a blue page update is filed the proceeding would be held in abeyance.

The Council strongly supports the filing of a blue page update reflecting 2021 actuals. HON’s past experience and actual spending is an important consideration when assessing the reasonableness of future forecasts. Having the most updated information available is important given that setting rates 2023 will impact rate levels for the next 4 years as HON’s rate plan is for the period 2023-2027. In addition, if a blue page update is not filed, the OEB and intervenors will have access to only one year of actual data related to the current transmission rate plan.

The OEB may be concerned that with a blue page update the proceeding will, in effect, be paused until the update can be completed. The Council submits that having the update is critical and the schedule should be set to accommodate it even it means the proceeding may take longer to complete.

**Confidential Information:**

The Council supports HON’s request for confidential treatment of the two documents cited in its letter dated August 5, 2021.

**Reply on Expert Evidence:**

On September 16, 2021, HON filed a letter with the OEB requesting that the schedule accommodate reply evidence in response to evidence filed by OEB Staff and/or intervenors. The Council does not

object to HON's request as long as there is a step in the process that allows for parties to file interrogatories regarding the reply evidence.

Yours truly,

**Julie E. Girvan**

Julie E. Girvan

CC: HON, Regulatory Affairs  
C. Keizer, Torys