Hydro One Networks Inc.

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Kathleen Burke

Director, Applications Delivery Regulatory Affairs

BY EMAIL AND RESS

September 30, 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,

RE: EB-2021-0110 - Hydro One Networks Inc. (Hydro One) 2023-2027 Custom Rate Application (JRAP) - Procedural Matters

Further to the Ontario Energy Board's (OEB) Procedural Order No. 1 (PO 1) dated September 17, 2021, this letter addresses the following procedural matters:

- 1. Submissions on the Export Transmission Service (ETS) Rate
- 2. Scope of Seasonal Rates in the JRAP
- 3. Request Regarding Interrogatory Nomenclature

1. Submissions on ETS Rate

PO 1 requests that Hydro One, working with the IESO, advise the OEB on the timing of a submission regarding the ETS rate. Hydro One and the IESO estimate they will be in a position to file submissions on October 14, 2021, and will endeavor to file a joint submission if possible.

2. Scope of Seasonal Rates in the JRAP

By letter dated July 2, 2021 in EB-2020-0246 (the Seasonal Proceeding), the OEB stated that the scope of that proceeding was to address the following issues:

- (1) how to implement the decision to eliminate the Seasonal class; and
- (2) for those who will experience total bill increases of 10% or more, the best approach to mitigating the increases.

The illustrative hearing schedules set out in PO 1 of this proceeding include the following note: "Assumes seasonal rates matter will be addressed during the Draft Rate Order and Tariff Sheets process."



Hydro One's understanding of the scope of the seasonal rates matter in the JRAP is as follows:

- Matters addressed in the Seasonal Proceeding (including but not limited to mitigation methodology and options, details of implementation, billing frequency) will not be within the scope of the JRAP proceeding; and
- Matters related to mechanics of moving seasonal customers to their respective density based residential classes and the associated rate design (e.g. cost allocation, billing determinants) are within the scope of the JRAP application.

Hydro One requests that the OEB confirm or clarify the above understanding, so parties have the opportunity to ask interrogatories within the scope of the JRAP proceeding, as appropriate.

3. Request re: Interrogatory Nomenclature

In PO 1 the OEB states that it will be using the exhibit as the reference for naming interrogatories and that the numbering for each interrogatory should be continuous. Hydro One's Exhibit B encompasses a significant portion of the Application and includes the: System Plans Framework (Exhibit B-01-01); Transmission System Plan (Exhibit B-02-01); Distribution System Plan (Exhibit B-03-01); and General Plant System Plan (Exhibit B-04-01).

To minimize confusion and provide efficiency, Hydro One requests that the OEB please provide further direction that for Exhibit B, the exhibit and tab will be used as the reference for naming related interrogatories. As an example, if OEB staff's fifth interrogatory is related to the Transmission System Plan (Exhibit B-02-01), it would be titled as 'B2-Staff-5'. In other words:

- B1 = the System Plans Framework (Exhibit B-01-01)
- B2 = the Transmission System Plan (Exhibit B-02-01)
- B3 = the Distribution System Plan (Exhibit B-03-01
- B4 = the General Plant System Plan (Exhibit B-04-01)

Hydro One requests that interrogatories be grouped by exhibit sequentially. As an example if OEB staff provides two interrogatories for rate base (Exhibit C) and two for OM&A (Exhibit E), they would grouped by exhibit and follow sequentially as C-Staff-1, C-Staff-2, E-Staff-3 and E-Staff-4.

Hydro One also wishes to clarify that staff and intervenors will use the "acronym of party" provided on pages 1 and 2 of PO 1 and that acronyms be provided for any late intervenors.

Sincerely,

Kathleen Burke

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