

Ms. Nancy Marconi  
Acting Registrar  
Ontario Energy Board  
P.O. Box 2319, 27th Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

February 10, 2022

Dear Ms. Marconi:

**EB-2021-0110 – Hydro One Joint Rate Application –  
Pollution Probe Comments related to Hydro One request for Evidence Update and Proposed Schedule  
Changes**

Pollution Probe is in receipt of Hydro One's letter dated February 7, 2022 and was present on day 1 of the settlement conference when Hydro One indicated it would not be able to proceed until it had an opportunity to update its evidence. This effectively appears to be an adjournment of the proceeding until the updated evidence is filed and the OEB has an opportunity to provide procedural direction on next steps.

**Proposed Evidence Update**

Hydro One has indicated that the January 2022 Consensus Forecast for inflation represents an unexpected and material increase. "The consequence is that based on the current forecasted costs for 2023-2027, Hydro One will not be able to achieve the associated volumes of work included in the investment plan for 2023-2027.....The impact will have a cumulative effect throughout the rate period, as forecast OM&A and capital expenditures will start from an inappropriate base amount in 2023."

Hydro One proposes to amend its application: "to consist of an update to the inflation assumptions within Hydro One's plan, and to include resulting amendments to OM&A and capital at the envelope level, together with associated bill impacts."

Pollution Probe believes that the Hydro One proposal and related schedule as outlined is unacceptable and inefficient. This will result in multiple sets of data that will create confusion and inconsistencies on the record. It will also make it difficult for the OEB and stakeholders to know which evidence, interrogatory and undertaking responses are still valid. Given the current stage of the process, it would be more efficient to adjourn until all the evidentiary references are updated by Hydro One.

The OEB should direct Hydro One to amend all their filed evidence including interrogatory and undertaking responses that are impacted and not just amendments to OM&A and capital at the envelope level. This includes revenue requirements, load forecast, cost allocation and rate impacts.

Hydro One's fourth quarter 2021 results will be released on February 25, 2022. In order to provide access to best available information for all parties and to avoid additional evidence updates, the company should be required to file a blue page update together with the amended evidence.

## Proposed Schedule Change

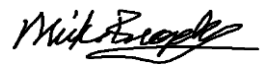
Hydro One has proposed to file its amended application on or before March 14, 2022. In the proposed schedule, it provides one week for stakeholders to prepare interrogatories and one week for Hydro One to provide responses. Given the impacts of the evidence updates, we do not believe this will be sufficient time to submit or respond to interrogatories. Depending on the scale of the new evidence impacts, a Technical Conference may also be required.

## Summary of Recommendations

1. Adjourn the proceeding until a complete set of updated evidence is available.
2. Hydro One should be directed to undertake a full and complete amendment to the application and record, including blue page updates.
3. Provision for a discovery process including interrogatories, Technical Conference and Settlement Conference following the complete evidence updates.

This is a significant application for Ontario ratepayers and the proposed plan needs to align with consumer and policy requirements. Hydro One has proposed material increases over the rate period without a clear assessment and commitment for specific outcomes to be delivered over the next five years. A thoughtful and transparent reset given the circumstances is the most appropriate and efficient path forward.

Respectfully submitted on behalf of Pollution Probe.



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Michael Brophy, P.Eng., M.Eng., MBA  
Michael Brophy Consulting Inc.  
Consultant to Pollution Probe  
Phone: 647-330-1217  
Email: [Michael.brophy@rogers.com](mailto:Michael.brophy@rogers.com)

cc: Hydro One Regulatory (via email)  
All Parties (via email)  
Richard Carlson, Pollution Probe (via email)