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BY EMAIL AND RESS

July 17, 2025

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

Dear Ms. Marconi,

Re: EB-2025-0149 – Stakeholder Consultation on the Review of the OEB’s Filing Requirements for Electricity Transmission Applications - Chapter 1 and Chapter 2 – Request for corrected comparison document and extension

In preparing Hydro One Networks Inc. (Hydro One)’s submission and comments on the proposed changes to the transmission filing requirements, it came to our attention that the OEB’s redline documents do not show all of the proposed changes when compared to the filing requirements issued in 2016 (2016 Filing Requirements) and available on the OEB’s website. Hydro One alerted the OEB to this matter and on July 16 OEB staff emailed stakeholders regarding the redline documents provided.

Hydro One believes this raises a fairness issue as this will result in parties to this stakeholder consultation commenting on inaccurate redline documents and thereby not providing comments on the full range of proposed changes. While Hydro One is unable to determine the extent of the differences between the OEB’s redline document and the 2016 Filing Requirements, Hydro One has attached an example to this letter. In this example, words have been deleted from the 2016 Filing Requirements but do not show up as deleted in the redline document, as if the words were not there in the first place. The result is that parties are not in a position to comment on the full changes proposed.

Given this fairness concern, Hydro One respectfully requests that a corrected redline document showing all proposed changes be provided to stakeholders and that stakeholders be provided an extension to provide comments.

Notwithstanding the above-noted request, Hydro One also requests that it be granted an extension to the July 17th deadline, to finalize its comments, by July 24th, 2025.

Sincerely,



Kathleen Burke

Appendix "A"

Please see attached – excerpt of OEB redline document followed by excerpt of 2016 Filing Requirements

~~section 2.0.2 for Custom IR guidance specific to electricity transmitters with minimal rate term capital requirements should refer to section 2.0.32 for Custom IR guidance expenditures. (Custom IR)~~

- **Revenue Cap IR:** ~~a~~ An incentive-based revenue **requirement** index plan of five years, comprising ~~of an request~~ initial application to establish a revenue requirement based on a single test year cost of service application. ~~The application should also request~~, followed by incentive-based and indexed adjustments to ~~the test year~~ revenue requirement for the balance of the **plan** term. ~~This Revenue Cap IR approach. Analogous to a Price Cap for distributors, this “Revenue Cap index” approach includes expectations for the development of an OEB transmission industry-specific inflation index, a as well as productivity factor and stretch commitments. The OEB invites transmitters to propose and substantiate the appropriate method and commitments for these elements.~~

~~Transmitters are to provide rationale to support the choice made and explain why the IR option chosen is appropriate, given its utility structure and asset base. The OEB will consider the IR option selected in the context of the primary goals and principles set out in the RRF. The RRF focuses on providing incentives to increased effectiveness and continuously improvement performance in meeting customer needs, including cost control, and system reliability and quality objectives.~~

To assist applicants in determining the options choice between the Revenue Cap IR and Custom IR and Revenue Cap IR, the following chart outlines the basic elements of the two options:

Other exhibits may also be included in an application in support of, or to document, other proposals for which the applicant is seeking OEB review and approval.

The OEB has provided numerous appendices (Excel-based data spreadsheets) for electricity distributors, as part of the Filing Requirements for Electricity Distributors. These appendices allow a consistent review of application information from the various distributors. Appendices have not been provided as part of these filing requirements. However, transmitters may wish to review the appendices to Chapter 2 of the Filing Requirements for Electricity Distributors to further support their evidence by providing appendices that are applicable to their transmission applications.

The items outlined below are general requirements that are applicable throughout the application:

- Written direct evidence is to be included before data schedules.
- Average of the opening and closing fiscal year balances must be used for items in rate base.
- Total capitalization (debt and equity) must equate to total rate base.
- Data for the following years, at a minimum, must be provided:
 - Test year = prospective rate year
 - Bridge year = current year
 - Four most recent historical years (or number of years necessary to provide actuals back to and including the most recent OEB-approved test year, but not less than four years)
 - Most recent OEB-approved test year
- Custom IR applicants must include in their evidence forecasts for revenue, costs and inflation for each year of the proposed rate term, and benchmarking evidence supporting the cost forecasts.
- Documents are to be provided in bookmarked and text-searchable Adobe PDF format.
- Tables must also be provided in working Microsoft Excel spreadsheet format where available and practical.

If a transmitter updates its evidence throughout the proceeding, the transmitter must ensure that any models submitted in the original application are updated appropriately.

To assist applicants in applying using Revenue Cap or Custom IR proposals, the following chart outlines the basic components of the new revenue requirement-setting options: