



SOCIETY *of*
UNITED PROFESSIONALS
IFPTE 160

17th July, 2025

Rebecca Caron
President
Society of United Professionals, IFPTE 160
2239 Yonge St
Toronto, ON M4S 2B5

VIA Email and RESS Filing

Nancy Marconi
Registrar
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Re: EB-2025-0149
Stakeholder Consultation on the Review of the OEB's Filing Guidelines for
Electricity Transmission Applications - Chapter 1 and Chapter 2
Submissions of the Society of United Professionals

Dear Ms. Marconi,

Further to the OEB's letters of June 5, 2025 and June 27, 2025 on the above subject proceeding, please find attached the Society of United Professionals' (SUP) written feedback.

Sincerely,

Rebecca Caron
President
Society of United Professionals, IFPTE 160
regulatory@thesociety.ca
(416) 979-2709

Copy by email: interested parties



SOCIETY *of*
UNITED PROFESSIONALS
IFPTE 160

**Society of United Professionals’
SUBMISSIONS ON INITIAL FEEDBACK**

**Re: EB-2025-01349
Stakeholder Consultation on the Review of the OEB’s Filing Guidelines for
Electricity Transmission Applications - Chapter 1 and Chapter 2**

17th July, 2025

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EB-2025-0149: Society of United Professionals' (SUP) Submissions

SUP has reviewed the OEB's draft Filing Requirements for Electricity Transmission Applications - Chapter 1 and Chapter 2 as provided with Theodore Antonopoulos' letter dated June 5, 2025, along with the presentations made by OEB staff¹ and Hydro One² at the June 25, 2025 Stakeholder Consultation meeting on this matter, as well as comments provided by parties at this meeting.

Further to the OEB's letters of June 5, 2025 and June 27, 2025 with regards to this proceeding, please find below the Society of United Professionals' (SUP) written submissions on this matter.

Item 1) Custom IR revenue requirement setting framework for single-asset transmitters, and a longer rate term

Generally, SUP supports the OEB's proposals for this item³. The OEB's intended goal to simplify the applications for transmitters with a declining rate base appears to be met with this proposal and should be followed as appropriate.

However, SUP supports Hydro One's modifications or adjustments to the OEB's proposed transmission filing requirement changes as outlined in its presentation at the June 25, 2025 Stakeholder Consultation meeting on this matter⁴. Specifically:

- the HONI Partnerships have annual OM&A expenses which vary materially (i.e. cyclical vegetation management expenses). So flexibility is required to propose a custom OM&A recovery approach to meet service requirements including an annual forecast.
- HONI Partnerships also require flexibility to propose custom approaches to demonstrate productivity due to OM&A expenses varying substantially annually rather than having consistent spending patterns that could achieve formulaic productivity.
- Partnerships have not yet had new customer connection requests; however this could change. So flexibility is required going forward to propose an approach to recover new connection costs and revenues.
- The rate term minimum of five years may have to be adjusted to reflect changing or unique circumstances. For instance, partnerships could be completed in multiple phases (over several years) rather than all partners being present when the assets are placed into service. There may be other unique circumstances, such as temporary or expiring financing terms/rates that must be updated, trailing costs (the main assets are placed into service, however there may be additional associated costs which are incurred over

¹ "Review of Filing Requirements For Electricity Transmission Applications – Chapter 1 & 2", OEB staff, dated 20250625

² "EB-2025-0149 - Stakeholder Consultation on the Review of the OEB's Filing Requirements for Electricity Transmission Applications – Chapter 1 and Chapter 2", Hydro One, dated 20250625

³ pp6-8, "Review of Filing Requirements For Electricity Transmission Applications – Chapter 1 & 2", OEB staff, dated 20250625

⁴ p6 "EB-2025-0149 - Stakeholder Consultation on the Review of the OEB's Filing Requirements for Electricity Transmission Applications – Chapter 1 and Chapter 2", Hydro One, dated 20250625

several years), mid-term in-servicing, mid-term refurbishment capex etc. So flexibility is needed to customize the framework for unique circumstances.

Rather than propose wording to reflect these valid concerns, SUP will review HONI's July 17 submission on Item 1 in this proceeding and provide any feedback in its July 31 submission.

Item 2) Review of materiality thresholds for provision of evidence

SUP supports the OEB's proposal to increase the 2016 materiality thresholds by 30%⁵. This appears to be a reasonable ballpark increase to reflect inflation over a ten year period. However, it may be informative to stakeholders if the OEB provided the calculation methodology of this 30% increase.

Item 3) Application filing deadline to coordinate annual UTRs (Uniform Transmission Rates) update

SUP supports the OEB's proposal to require that⁶:

- **rebasing/cost of service applications** of an existing transmitter be filed by **the last business day of April**, for Jan 1 following year rate implementation; and
- **annual update applications** of an existing transmitter be filed by **the last business day of May**, for Jan 1 following year rate implementation.

SUP also supports the OEB's proposal on treating the late filing of applications as well as filing a rebasing / cost of service application earlier than scheduled⁷. However, in some instances, for example where the OEB requires Hydro One Transmission and Distribution to do a joint rebasing application, as was the case in EB-2021-0110, if it were to be filed by **the last business day of April**, for January 1 following year rate implementation, the hearing would likely conclude well past January 1. In the case of the EB-2021-0110 joint rebasing application, the evidence was submitted on 20210805, the OEB's Decision was issued about 16 months later on 20221129 and the new rates were implemented on 20230101. In such circumstances, the OEB should be obliged to work with applicant well in advance to determine what the optimal date would be for a joint Transmission and Distribution rebasing / cost of service application to be filed. This may be worth noting in the filing requirements.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED ON THIS
17th DAY OF JULY, 2025**

⁵ p11, "Review of Filing Requirements For Electricity Transmission Applications – Chapter 1 & 2", OEB, dated 20250625

⁶ p12,13 "Review of Filing Requirements For Electricity Transmission Applications – Chapter 1 & 2", OEB, dated 20250625

⁷ pp10,11 "Review of Filing Requirements For Electricity Transmission Applications – Chapter 1 & 2", OEB, dated 20250625