



**SOCIETY of  
UNITED PROFESSIONALS**  
IFPTE 160

31<sup>st</sup> July, 2025

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

**VIA Email and RESS Filing**

Ms. Nancy Marconi  
Registrar  
Ontario Energy Board  
P.O. Box 2319, 27<sup>th</sup> Floor  
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**  
**Additional 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 on submissions made by other parties on July 17, 2025.

Sincerely,

Rebecca Caron  
President  
Society of United Professionals, IFPTE 160  
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(416) 979-2709

Copy by email: interested parties



**SOCIETY *of***  
**UNITED PROFESSIONALS**  
IFPTE 160

**Society of United Professionals'**  
**SUBMISSIONS ON JULY 17 COMMENTS**

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

**31<sup>st</sup> July, 2025**

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

SUP has reviewed the comments of parties submitted on July 17, 2025 or later on the OEB's draft Filing Requirements for Electricity Transmission Applications - Chapter 1 and Chapter 2 dated June 5, 2025.

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 these July 2025 comments provided by parties.

### **Elimination of Duplicative Wording from OEB Rules and Guidance**

In their submissions earlier this month, both Hydro One<sup>1</sup> and Pollution Probe<sup>2</sup> recommend eliminating duplication of as well as restatement of wording from existing OEB rules and guidance in the OEB's draft Filing Requirements for Electricity Transmission Applications, and instead, simply provide references to such. SUP supports this recommendation as it eliminates the need to update the Transmission Filing Requirements to reflect updates to OEB rules and guidance as well as eliminates any potential differences in wording or interpretation of meaning between different OEB documents.

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

As noted in its July 17 submission, 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 matter<sup>3</sup> as well as Hydro One's submission of last week in this consultation<sup>4</sup>.

Both Five Nations Energy Inc. (FNEI)<sup>5</sup> and Wataynikaneyap Power LP ("WPLP")<sup>6</sup> in their submissions expressed broadly similar concerns to those elucidated by Hydro One regarding flexibility to propose revenue requirement frameworks that are responsive to the needs and circumstances of the First Nation community or communities which own(s) or partners in a single-asset transmitter. SUP's view is that is incumbent upon the OEB to heed and take action on the stated concerns of these three parties on the proposed revenue requirement framework in particular, as well as other matters in this EB-2025-0149 consultation.

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<sup>1</sup> "EB-2025-0149 HONI Submission" dated 20250723 e.g. p14 ln27-31

<sup>2</sup> "EB-2025-0149 Pollution Probe Comments" dated 20250714 e.g. p2 para 2

<sup>3</sup> 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

<sup>4</sup> "EB-2025-0149 HONI Submission" dated 20250723

<sup>5</sup> "EB-2025-0149 - Five Nations Energy Inc. Comments" dated 20250717

<sup>6</sup> "Comments from Wataynikaneyap Power LP EB-2025-0149" dated 20250718

For instance, Hydro One states in its submission<sup>7</sup>:

*“The Proposed [Revenue Requirement] Framework will not allow Hydro One to be responsive to the needs of its current and future partnerships because it provides no flexibility for future partnerships to propose a unique framework. As a result, it is Hydro One’s submission that the section setting out the Proposed Framework should be removed in its entirety from the proposed changes.”*

If the OEB were to action this Hydro One recommendation in this consultation, this would also address many of the concerns of FNEI and WPLP.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED ON THIS  
31st DAY OF JULY, 2025**

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<sup>7</sup> “EB-2025-0149 HONI Submission” dated 20250723 p4 ln4-8