

**HYDRO ONE LIMITED
RESPONSE TO REQUEST FOR INFORMATION**

JURISDICTION:	WASHINGTON	DATE PREPARED:	September 20, 2018
CASE NO.:	U-170970	WITNESS:	Chris Lopez
REQUESTER:	TEP	RESPONDER:	Adele Pantusa
TYPE:	Data Request	DEPT:	Law
REQUEST NO.:	TEP – 044(H1)	TELEPHONE:	416-345-6310
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REQUEST:

RE: Supplemental Testimony of Christopher F. Lopez, Exh CFL-1T at 10:15-12:14.

Mr. Lopez testifies that the Commission can be certain about the funding of certain listed Community and Low-income Commitments (Commitments 63, 64, 67, 69, 70, 77, and 79) based on the availability of funding through the use of Avista's retained earnings, indicating that "With this approach there is no need for cash to flow from Hydro One to Avista."

- a. Please explain whether there are any factors that would limit the use of retained earnings for funding the listed Commitments.
- b. Please confirm that Hydro One is able to and will make "funds available from other Hydro One affiliates" to fund the Stipulated Commitments listed.
- c. Please state whether, in the event retained earnings are not available at Avista for any reason, there exists any uncertainty, condition or other limitation, on funding the listed Commitments from other Hydro One sources.
- d. Please state whether any electric rate reduction required by the Province of Ontario would impair Hydro One's ability to fund the listed Commitments.

RESPONSE:

- a. To the best of our knowledge, we are not aware of any factors that would limit the use of available amounts of Avista's retained earnings for funding of the listed Commitments.
- b. Hydro One could if needed make use of its retained earnings to fund the Stipulated Commitments.
- c. Please see the reply to part b above.
- d. As the Commitments are expected to be funded from the retained earnings of Avista, any electric rate reductions required by the Province of Ontario would not have any bearing on the ability to meet these Commitments.