



**December 7, 2017**

*sent via courier and email*

Ms. Kirsten Walli  
Ontario Energy Board  
PO Box 2319 27th Floor,  
2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

Dear Ms. Walli,

**RE: 2018 IRM Distribution Rate Application (EB-2017-0028) -Draft Rate Order**

Pursuant to the OEB's letter of December 1, 2017, Brantford Power Inc. ("BPI") has reviewed the Draft Rate Order in its IRM Rate Application for rates effective January 1, 2018 and accompanying models. BPI has identified two inconsistencies in the accompanying model, which are set out below. BPI is providing a rate generator model which includes its proposed updates via the RESS, however neither change has any impact on the rates in the Draft Rate Order.

**Changes required:**

**LRAMVA**

The addition of \$486 in LRAMVA principal related to the 2015 Loblaw Pilot, has resulted in an additional projected interest amount in 2017 of \$5, bringing the total LRAMVA claim to \$220,872 (consisting of \$215,041.70 principal and \$5,830.66 in total interest) . While this amount is reflected in tab 3-Continuity Schedule of the Rate Generator Model included with the Draft Rate Order, the allocations on tab 4-Billing Determinants for Deferral Variance Accounts did not reconcile to the continuity schedule as a result. BPI has made the adjustments to allocate this amount to the General Service 50 to 4,999 kW rate class, eliminating any variance. This change does not result in any change to the proposed LRAMVA rate rider, due to rounding of the rates.

**Bill Impacts for General Service less than 50 kW Class**

BPI has also changed the bill impact calculations for the General Service less than 50 kW Class to be based on metered consumption levels of 2,000 kWh, which is the standard typical consumption level applicable to this customer class. The previous versions of the bill impacts were erroneously based on 3,000 kWh. The resultant total bill impacts (after tax and 8% Rebate) are now \$0.47 or 0.17%. BPI



notes verbiage on page 7 of the Draft Decision and the accompanying table 7.1 would require updates as well.

BPI confirms the remainder of the Draft Decision, Draft Rate Order and Rate Generator model are consistent with its expectations.

Sincerely,

*[Original Signed By]*

Oana Stefan

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