more than energy"



VIA RESS AND OVERNIGHT COURIER

November 4, 2013

Ms. Kirsten Walli Board Secretary Ontario Energy Board P.O. Box 2319 2300 Yonge Street Suite 2700 Toronto, Ontario M4P 1E4

Dear Ms. Walli:

Re: Enersource Hydro Mississauga Inc. Application for Distribution Rates Effective January 1, 2014 Enersource Final Submission Board File No. EB-2013-0124

Please find attached Enersource's final submissions in the above- captioned proceeding.

Two sets of hard copies will be sent to the Board in addition to filing this via RESS.

If you have any questions or concerns, please do not hesitate to contact me at (905) 283-4098.

Sincerely,

(Original signed by)

Gia M. DeJulio Director, Regulatory Affairs

cc. Dan J. Pastoric, Executive Vice-President and Chief Operating Officer All Intervenors EB-2013-0124 (via email)

Ontario Energy Board

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Sched. B, as amended;

AND IN THE MATTER OF an Application by Enersource Hydro Mississauga Inc. for an Order or Orders approving just and reasonable rates and other service charges for the distribution of electricity, to be effective January 1, 2014.

Enersource Hydro Mississauga Inc.

Final Submissions

November 4, 2013

Introduction and Summary of Positions

- 1. Enersource Hydro Mississauga Inc. ("Enersource") filed a complete Application with the Ontario Energy Board (the "Board") on August 16, 2013 under section 78 of the *Ontario Energy Board Act, 1998* (the "Act"), seeking approval for changes to the distribution rates that Enersource charges for electricity distribution, to be effective January 1, 2014. The Application is based on the Board's Guidelines for 4th Generation Incentive Regulation Mechanism ("4GIRM") established in the *"Report of the Board Renewed Regulatory Framework for Electricity Distributors: A Performance-Based Approach*", released on October 18, 2012.
- 2. Following an interrogatory phase in this proceeding, final submissions were received from Board Staff and the Vulnerable Energy Consumers Coalition ("VECC") on October 31, 2013.
- 3. Enersource notes that both parties indicated full support for Enersource's Application.

Next Steps

- 4. As noted above, Enersource's Application is based on 4GIRM. However, there remains the outstanding issue of the final formulaic factors that are to be used to adjust rates for 2014. Enersource understands that these key pieces of information will be made available by the Board in mid- to late-November. Until these factors are released, final rates and bill impacts for 2014 remain unknown.
- 5. Likewise, as Board Staff noted in its submissions¹, the Board will also update the applicable data based on the Uniform Transmission Rates ("UTR") in place at the time of the Decision in this proceeding.
- 6. In its Application Enersource filed a separate Disposition Adjustment Model that replicated the billing determinants, allocation and calculation of deferral and variance account rate riders for the Group 1 disposition. This model was filed to accommodate the allocation of the balance in Account 1589 Global Adjustment. This model, and others, including the Board's Rate Generator Model, must be updated to include the final rate adjustment factors and UTRs.

¹ Board Staff submissions dated October 31, 2013, page 1.

- 7. In its submissions, Board Staff discussed² certain discrepancies in the models originally filed by Enersource. In response to Board Staff interrogatories, Enersource confirmed the filing error and provided revised models with the missing data. Board Staff also indicated that it would make the necessary revisions to Enersource's models at the time of the Board's Decision on the Application.
- 8. Enersource appreciates that Board Staff will be updating the model(s) once the final 4GIRM report is released. However, it is not clear to Enersource whether a Decision in this proceeding will be available prior to, or following the release of the final 4GIRM factors. Thus, Enersource requests the opportunity to review and confirm the calculations of Board Staff after the release of the 4GIRM report (with the final factors for 2014) and the Decision in this proceeding, prior to issuing Enersource's Final Rate Order for 2014.
- 9. Enersource will engage with Board Staff diligently to ensure that the Final Rate Order can be issued in a timely fashion to allow for the implementation of new rates effective January 1, 2014. Enersource would also be appreciative of a Final Rate Order issued prior to December 18, 2013 to allow for an orderly implementation.

Conclusion

10. In summary, Enersource submits that its Application for 2014 rates and associated rate riders be approved. This Application has been supported by all parties in this proceeding - Board Staff and VECC.

All of which is Respectfully Submitted:

Gia M. DeJulio, Enersource Hydro Mississauga Inc.

² Board Staff submissions dated October 31, 2013, page 1.