

Ontario Energy Board

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c. 15, (Schedule B);

AND IN THE MATTER OF an application by St. Thomas
Energy Inc. for an order approving just and reasonable rates
and other charges for electricity distribution to be effective
January 1, 2015.

**COMMENTS ON DRAFT RATE ORDER OF
ENERGY PROBE RESEARCH FOUNDATION
("ENERGY PROBE")**

December 7, 2014

**ST. THOMAS ENERGY INC.
2015 RATES REBASING CASE
EB-2013-0113**

**ENERGY PROBE RESEARCH FOUNDATION
DRAFT RATE ORDER COMMENTS**

The following are the comments of Energy Probe Research Foundation ("Energy Probe") on the Draft Rate Order ("DRO") dated December 2, 2014 filed by St. Thomas Energy Inc. ("STEI"), along with the letter filed by STEI on December 5, 2014.

Energy Probe has reviewed the draft rate order and believes it appropriately reflects the approved Settlement Proposal and the update for the cost of capital parameters issued by the Board on November 20, 2014.

Energy Probe provides the following comments with respect to two specific issues.

Rate Rider Calculation for Deferral/Variance Accounts Balances (excluding Global Adj.)

Energy Probe agrees with the rate rider calculation and the total allocated balance of \$739,165 shown in the table on page 8 of the DRO.

However, the calculation of this amount of \$739,165 is not shown in the DRO by account. Energy Probe notes that there were some account additions to that filed in the original evidence through the interrogatory process, as well as the removal of interest beyond December 31, 2014.

Energy Probe submits that it would be useful if the DRO included a table that showed the additions/changes by account that result in the agreed upon amount. No such table was included in the Settlement Proposal. Inclusion of this table would eliminate any potential future confusion about which accounts had been cleared in the current proceeding.

MicroFIT Charge of \$10 per Month

Energy Probe supports and agrees with the additional background information provided by STEI on December 5, 2014 with respect to the MicroFIT service charge of \$10 per month.

This particular item was not included in the Settlement Proposal because, as noted at the technical conference, STEI sought an increase in this charge relative to what was in the application.

This was in response to a question from Energy Probe that asked STEI if they would agree to an increase to recover the third party charge of \$10 per customer per month. STEI agreed they would do so.

While not explicit in the Settlement Proposal, Energy Probe notes that the increased MicroFIT recovery is embedded in the settlement agreement calculations, cost allocation and rate design.