



Albert P. Singh, MBA, CGA
Vice-President, Finance & CFO

WATERLOO NORTH HYDRO INC.

PO Box 640
526 Country Squire Rd.
Waterloo ON N2J 4A3
Telephone 519-888-5542
Fax 519-886-8592
E-mail asingh@wnhydro.com
www.wnhydro.com

March 4, 2015

Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto, Ontario
M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms Walli:

Re: May 1, 2015 IRM Rate Filing Comments / EB-2014-0119

Pursuant to the instructions contained in the Draft Decision and Order issued by the Board on February 19, 2015 regarding the 2015 IRM Rate Application of Waterloo North Hydro Inc. (WNH)., WNH hereby submits its comments. We enclose two (2) hard copies of this response.

WNH has previously forwarded the PDF version of these Comments and an Excel File containing a Proposed Revised Version of the Board's 2015 Rate Generator Model via the Board's web portal.

The details of the revision being submitted are as follows:

WNH received the 2015 IRM Rate Generator Model that was enclosed with the Draft Decision and Rate Order. WNH noted that the rates that on Sheet 15. RTSR – UTRs & Sub-Tx Effective January 1, 2015 for Kitchener-Wilmot Hydro (a Host Distributor to WNH) had been changed.

WNH agreed these rates to Kitchener-Wilmot Hydro's approved rate order.

WNH traced the impact of the change in these rates and noted that the totals in cells F109 and J109 in Sheet 18. RTSR – Forecast, which should have changed due to the new rates, had not changed from WNH’s previously submitted model.

Upon investigation, it was determined that the formulas in rows 96 to 107 of Sheet 18 only included the IESO and HONI costs, they did not include the costs from WNH’s two Host Distributors, namely Kitchener-Wilmot Hydro and Cambridge and North Dumfries Hydro. The omission of these costs resulted in the RTSR Rates on Sheets 21 through 23 being lower than if the Host Distributor Costs were included.

WNH made Board Staff aware of this issue and Board Staff issued a revised model on February 24, 2015 which corrected the formulas on Sheet 18.

WNH is submitting this revised model which results in revised RTSR Rates as detailed in Table 1 below. WNH has agreed the Proposed Revised Rates below, and as reflected in Sheet 23. RTSR Final 2015 RTS Rates of the Revised 2015 IRM Rate Generator Model, to Sheet 27. Final Tariff Schedule of the same model.

Table 1 – Proposed Revised RTSR Rates

Rate Description	Unit	Proposed Retail Transmission Rates	
		Draft Decision & Order	WNH Proposed Revised
Retail Transmission Rate - Network Service Rate	\$/kWh	0.0073	0.0076
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kWh	0.0022	0.0023
Retail Transmission Rate - Network Service Rate	\$/kWh	0.0067	0.0069
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kWh	0.0020	0.0021
Retail Transmission Rate - Network Service Rate - (less than 1,000 kW)	\$/kW	2.7443	2.8421
Retail Transmission Rate - Network Service Rate - Interval Metered (less than 1,000 kW)	\$/kW	2.9148	3.0187
Retail Transmission Rate - Network Service Rate - Interval Metered (1,000 to 4,999 kW)	\$/kW	2.9110	3.0148
Retail Transmission Rate - Line and Transformation Connection Service Rate - (less than 1,000 kW)	\$/kW	0.7655	0.8165
Retail Transmission Rate - Line and Transformation Connection Service Rate - Interval Metered (less than 1,000 kW)	\$/kW	0.9561	1.0198
Retail Transmission Rate - Line and Transformation Connection Service Rate - Interval Metered (1,000 to 4,999 kW)	\$/kW	0.9550	1.0187
Retail Transmission Rate - Network Service Rate - Interval Metered	\$/kW	3.2272	3.3423
Retail Transmission Rate - Line and Transformation Connection Service Rate - Interval Metered	\$/kW	0.9594	1.0234
Retail Transmission Rate - Network Service Rate	\$/kWh	0.0067	0.0069
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kWh	0.0020	0.0021
Retail Transmission Rate - Network Service Rate	\$/kW	2.0699	2.1437
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kW	0.5915	0.6310

WNH notes that the 2015 IRM Rate Generator Model that had been issued with the Draft Decision and Rate Order was named 'Waterloo_2005_IRM_Rate-Generator_Draft Decision_x'. WNH has changed the name of the file now being submitted to 'Waterloo_2015_IRM_Revised_Rate-Generator_Draft Decision_x'.

WNH notes that Board Staff previously, combined in the Draft Rate Order, the Wholesale Market Participant (WMP) Rate Rider with the General Service 50 to 4,999 kW Rate Class. WNH would request that they combine these again from this Proposed Revised Rate Model.

WNH also notes that the Draft Decision and Rate Order states:

“The rate generator model and resulting tariff sheets enclosed with this correspondence reflect retail transmission service rates based upon the best available information at the time of this letter. The language in the decision is written in expectation of approved applicable retail transmission service rates being available at the time the decision is finalized. Board staff will update your application with any applicable rates should more information become available prior to the issuance of the final decision in this proceeding. Staff will contact you if an update is made to the rate generator model.”

If there are any questions, please contact Chris Amos at 519-888-5541, camos@wnhydro.com or myself at 519-888-5542, asingh@wnhydro.com .

Yours truly,

Original Signed By

Albert P. Singh, MBA, CGA
Vice-President, Finance and CFO