

EB-2015-0094

Oakville Hydro Electricity Distribution Inc.

**Application for electricity distribution rates and other
charges effective January 1, 2016.**

**SUBMISSIONS OF
ENERGY PROBE RESEARCH FOUNDATION
("ENERGY PROBE")**

December 21, 2015

**OAKVILLE HYDRO ELECTRICITY DISTRIBUTION INC.
2016 IRM RATES CASE**

EB-2015-0094

SUBMISSION OF ENERGY PROBE RESEARCH FOUNDATION

A- INTRODUCTION

Energy Probe is making submissions only on the Ontario Energy Board ordered cost allocation study. This study was to determine the reasonable amounts to be charged to the unregulated affiliate of the distributor. It was to be filed with the current application. However, to date, no such study has been filed with the Board and there is nothing currently on the record in this proceeding.

B - SUBMISSIONS

Energy Probe has had the opportunity to review the submissions of Board Staff and the HVAC Coalition with respect to this issue.

Energy Probe supports the submissions of HVAC Coalition with respect to the need to have the final study filed as part of the record in this proceeding and the need for discovery. Given the technical nature of a cost allocation study, Energy Probe believes that it may also be useful to have a technical conference following receipt of interrogatory responses related to the study. At this time, Energy Probe, having not seen the study, is not able to submit if cross-examination would be required.

Energy Probe supports the submissions of Board Staff and of the HVAC Coalition with respect to the setting of rates as of January 1, 2016 on an interim basis. At this point the Board and parties to the proceeding do not have any idea of the magnitude of the change in the allocation of costs from ratepayers to the unregulated affiliate. As a result, the changes may or may not be material and this will not be known until all parties have had the opportunity for discovery.

As to whether the changes should be implemented in 2016 under an IRM, Energy Probe submits that this should be left for consideration following identification of the magnitude of the impact the allocation of costs has on the various rate classes.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

December 21, 2015

**Randy Aiken
Consultant to Energy Probe**