

Telephone: (705) 326-7315 Fax: (705) 326-0800

January 4, 2016

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

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: Applications for 2016 Electricity Rates

Orillia Power Distribution Corporation ("Orillia Power") is on the list of distributors whose rates are scheduled for rebasing for the 2017 rate year. Orillia Power is submitting a request to defer rebasing until August 2017 for rates effective May 1, 2018 based on the following rationale.

## **Financial Position**

We believe that Orillia Power can continue to manage its resources and financial needs, while minimizing regulatory costs and providing its customers with stable rates over the foreseeable horizon within existing approved rates under the 4<sup>th</sup> Generation Price Cap Adjustment Mechanism. Key indicators of Orillia Power's financial position and performance with respect to system reliability indicators as reported in OEB RRRs are provided in the following tables:

## Regulated Return on Equity on a Deemed Basis

Regulat	ed Return on Eq	uity on a Deer	ned Basis
2010 COS	2013	2014	2015 Estimated
9.85	11.70	12.11	10.75

Orillia Power's regulatory rate of return is expected to remain within ±300 basis point ("the dead band") of its last OEB approved rate of return as shown above. Orillia Power acknowledges that rebasing may be indicated sooner in the event its rate of return falls outside of the dead band.









## Service Reliability Indicators - 3-year performance

Service Reliability Indicators									
Index	Including Code 2 Outages			Excluding Code 2 Outages					
	2013	2014	2015 Estimate	2013	2014	2015 Estimate			
SAIDI	1.640	2.190	0.948	1.130	2.150	0.936			
SAIFI	2.380	6.020	2.020	1.030	1.280	1.667			

Orillia Power's target ranges for SAIDI and SAIFI (excluding Code 2 outages) reported in its 2014 Scorecard are:

SAIDI - at least within 0.24 - 1.13, and

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SAIFI - at least within 0.86 - 1.89

2015 estimates for system reliability are within these target ranges. Orillia Power exceeded its target for SAIDI in 2014 due to a severe wind storm Sep 5/14 in our service area that involved extensive restoration efforts.

## **Other Considerations**

The City of Orillia, the sole shareholder of Orillia Power Corporation, is currently exploring an economic development opportunity with Hydro One Networks Inc. which would include the acquisition of the distribution company, Orillia Power Distribution Corporation. In light of this, Orillia Power submits that it would be prudent to defer rebasing until August 2017 in addition to the rationale presented above.

Should the Board have questions in support of this request, please contact the undersigned.

Respectfully,

Keith McAllister, P.Eng.

President & CEO