



PUBLIC INTEREST ADVOCACY CENTRE
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November 7, 2016

VIA E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli:

**Re: EB-2016-0114 Whitby Hydro Electric Corporation 2017 IRM Rate Application
Submissions of Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed the submissions of VECC in the above-noted proceeding.

Thank you.

Yours truly,

A handwritten signature in black ink, appearing to read 'Michael Janigan', is written over a thin horizontal line.

Michael Janigan
Counsel for VECC

Cc: Whitby Hydro Electric Corporation

Ontario Energy Board

IN THE MATTER OF AN APPLICATION BY

Whitby Hydro Electric Corporation (Whitby Hydro)

**Application for electricity distribution rates and other
charges effective January 1, 2017.**

Submissions of the Vulnerable Energy Consumers Coalition

Disposition of Deferral and Variance Account 1576

- Whitby Hydro seeks to establish a rate rider for the disposition of Account 1576 on an interim basis. The disposition amount is based on Account 1576 activity during 2015 including a calculated rate of return. The amount of the disposition is a credit of \$1,285,347 (1,200,811 + \$84,536 return).
- The proposed 1576 disposition reflects the return to customers of 1 year of 1576 transactions as compared to the current rate rider which represents 2 years of transactions (2013 & 2014). The proposed 1576 Rate Riders (credits) in 2017 are approximately 40% lower than the prior year.
- The current approach to address the 1576 transactions outside of a cost of service process is similar in nature to Whitby Hydro's previous application (EB-2015-0251) which was folded into Whitby Hydro's IRM application. This rate rider will continue the advancement of credits on customer bills prior to Whitby Hydro's next cost of service at which time it will finalize the 1576 disposition.
- Whitby Hydro indicates the refund will provide customers some measure of financial relief to assist in offsetting the proposed LRAMVA disposition request while easing some of the impact of the expiration of the current 1576 Disposition rate rider which ends December 31, 2016.
- In response to Board Staff interrogatory #4, Whitby Hydro explained that it cannot support an extension of the proposed rate rider beyond 2017 until Whitby Hydro's next rebasing as it expects that the amount of net transactions impacting the 1576 account will not remain consistent in current and upcoming years due to fluctuations in yearly capital programs.
- Given that the 2015 audited amount is not expected to be representative of future years, VECC supports Whitby Hydro's proposal to clear the 2015 balance in Account 1576 in 2017, as a \$1,285,347 credit to ratepayers (over a one year period) on an interim basis. VECC

agrees this return to customers will assist in tempering upward pressures on rates from other increases.

Recovery of Reasonably Incurred Costs

- VECC submits that its participation in this proceeding has been focused and responsible. Accordingly, VECC requests an order of costs in the amount of 100% of its reasonably-incurred fees and disbursements. All of which is respectfully submitted this 7th day of November 2016.