

1500 Bishop Street, P.O. Box 1060, Cambridge, Ontario N1R 5X6 • Telephone 519-621-3530 • Facsimile 519-621-0383 Website www.energyplus.ca

September 14, 2018

Ontario Energy Board PO Box 2319, 27th Floor 2300 Yonge Street Toronto, ON M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

RE: Energy+ Inc. 2019 Cost of Service Application (EB-2018-0028)
Responses to Customer Letters of Comment

Please find attached Energy+ Inc.'s responses to six Letters of Comment filed on the Ontario Energy Board website, up to and including July 11, 2018.

We have included a copy of each of the original letters of comment from the customer followed by Energy+ Inc.'s response to the customer.

Sincerely, **ENERGY+ INC.**

Sarah Hughes, CPA, CA, C.Dir. Chief Financial Officer

Encls.

Letter of Comment: Tony Sorrentino

From: Tony Sorrentino

Sent: Friday, June 1, 2018 4:23 PM To: registrar <<u>registrar@oeb.ca</u>>

Cc: Tony Sorrentino

Subject: EB-2018-0028 - Agenda Item Feedback

I just received my notification regarding the 2019 Cost of Service Rate Application to change Energy+ electricity distribution rates effective January 1, 2019. Apparently this is to harmonize the rates and charges in Cambridge and North Dumfries and Brant County service areas, as well Energy+ has also applied to introduce a new standby charge.

Through their site they have provided the option for customers to view the Energy+ Inc. 2019 Cost of Service Rate Application - Board File No: EB-2018-0028, an electronic file that is 194MB in size and 3838 pages long.

If customers are to get a chance to review and attempt to understand this material; I believe Energy+ is obligated to provide a condensed and simplified version so all customers or stakeholders have an opportunity to understand what changes are exactly taking place and how those changes can impact them. An application for changes provided for customers to review, should not take countless hours to read or understand. Hydro customers should not have to call a lawyer to interpret an application or agreement that they are expected to understand for awareness and possibly contest to during a community meeting.

For everyone to participate fairly in a public hearing, customers should have the right to consider the application filed by Energy+ accurately; this material must be written in accessible language—where potential attendees or citizens impacted by these changes can sit down without lawyers and read, truly understand, and feel comfortable with what's being put forward regarding changes that impact them directly.

In addition, there are ambiguous terms, such as used in the insert: https://www.energyplus.ca/en/myhome/resources/Bill-Inserts/OEB-Community-Meeting-July-11-2018.pdf, that require to be more concise, as it seems intended in some way to be purposely be unclear to the reader.

I refer to:

"...If approved, residential customers in Cambridge, and North Dumfries <u>may</u> see an increase of \$2.43 per month and residential customers in Brant County <u>may</u> see a month decrease of 2.76..."

This type of language needs to specify what "may" means - "may' can be defined as "...may be higher increase, of up to 2.43..." or "....may not to exceed 2.43...". There seems to be many interpretations.

Also I believe, for Energy+ to specifically indicate that one region's rates will increase while another will decrease, negatively impacts the relationship between those communities and that this display or wording is intended to create discord during the public hearing; as some attendees

will clearly be supporting a rate decrease while others will be against it - this insert's wording looks to generate conflict on purpose or build orchestrated support for Energy+.

I write this email as my formal request to make this feedback heard and have it added as an agenda item for the Ontario Energy Board's Community Meeting that is scheduled to be held Wednesday July 11th 2018 from 6:30 to 8:30PM.

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August 31, 2018

Mr. Tony Sorrentino

Dear Mr. Sorrentino:

Thank you for your Letter of Comment submitted to the Ontario Energy Board (OEB) with respect to Energy+ Inc.'s proposed Cost of Service Rate Application (the "Application") for changed rates effective January 1, 2019. We appreciate all customer feedback and the time you took to submit your comments.

You have raised concerns with respect to the complexity of the application and the process. We appreciate the rate application is very complicated. This arises because Energy+ must provide detailed evidence in response to the OEB's Filing Requirements – to ensure that the OEB has sufficient information upon which to make a decision.

In order to assist our customers (like you) in making sense of the application, Energy+ Inc. has prepared a presentation that summarizes the key elements of the Application, which was presented at the July 11th Community Meeting hosted by the OEB.

The presentation can be found on our website at the following link: https://www.energyplus.ca/en/myhome/2019-cost-of-service-rate-application.asp

With respect to the bill insert, you noted that the term "may" seemed open to interpretation. "... If approved, residential customers in Cambridge and North Dumfries <u>may</u> see an increase of \$2.43 per month and residential customers in Brant County <u>may</u> see a monthly decrease of \$2.76...."

The phrase "may" was used in the notice as the Application as submitted by Energy+ Inc. is subject to approval by the OEB. The requested amounts may not be approved by the OEB and this means that the final rate impact for the customer would be different than what is proposed in the Application.

With respect to the proposed plan to harmonize the rates for Cambridge North Dumfries customers and County of Brant customers, Energy+ Inc. recognizes that under this proposal, some customers will pay more, and some customers will pay less. This adjustment, however, will ensure that all customers within a customer class are paying the same rate for the services they receive from Energy+ commencing in 2019. In making this proposal, Energy+ considered that all customers within a customer class, regardless of the where you live, receive the exact same services, expect the same level of customer service, and expect the same levels of reliability.

The OEB expects a utility to file a proposal for rate harmonization at the time of its next Cost of Service Application following a merger or acquisition. As part of the acquisition of the former Brant County Power Inc. in 2014, Energy+ committed to harmonizing the rates in 2019.

Page 2 August 31, 2018 Mr. Tony Sorrentino

As requested by the OEB as part of this Application, Energy+ has prepared a calculation of the estimated distribution rates for Cambridge North Dumfries customers, as if the amalgamation transaction had not occurred. The results demonstrate that the proposed residential customer distribution rates requested in the rate application, are approximately \$1.12 less in 2019, than they would have otherwise been, in the absence of the joining together of the two utilities.

I would be pleased to address any additional questions or concerns that you may have. I can be reached at shughes@energyplus.ca or 519-621-3530 Ext. 2638.

Sincerely, **ENERGY+ INC.**

Sarah Hughes, CPA, CA, C.Dir. Chief Financial Officer

Letter of Comment: Sandra Hill

Complaint to OEB File No. EB 2018-0028 Energy +, Cambridge Ontario.

Residents and businesses in Cambridge and North Dumfries could see their hydro costs go up in 2019 if a rate change request by Energy Plus is approved by the OEB.

"Harmonization of rates is meant to align the rates so that no matter where a customer lives in the service territory, they pay the same rate for the same level of service.

When did it become the responsibility of the residents or businesses of Cambridge who had no decision making on the proposed amalgamation of Cambridge North Dumfries Hydro and Brant County Power to have their hydro rates increase? We, "the people" who pay for hydro service did not make this decision, "the OEB did". Further, we did not agree to allow Brant Count to incur no further cost or increases once Cambridge Hydro took over Brant County Power. This was strictly in the deal made by two CEO Corporate Hydro boards in two separate municipalities. This harmonization relates to the 2014 purchase of Brant County Power Inc. should not impact the people of Cambridge making their hydro rates increase due to this decision. This leads me to believe, this deal to increase hydro rates was set prior to the Brant & Cambridge becoming one entity. The smell test doesn't smell good.

The OEB, Brant County and Cambridge (Energy +) knew what they were getting into and the OEB should refuse these two territories who currently have their own separate rates, "Refuse" Energy + to make those rates the same starting next year.

Ontario Energy Board is to protect the residential/business customer in Ontario to calculate and report on the rate impacts we, the people will pay. OEB policy as of April 2015 rate design to a fully fixed rate structure over four years. Starting in 2016. (until 2020).

This policy set out by the <u>OEB was designed so that the fixed rate will increase gradually and the</u> "usage rate" will decline.

March 2016 the OEB impacted our hydro rates by including a 2.8% increase in our fixed rates.

May 1, 2018 the OEB approved an adjustment to the Price Cap IR to a .90% Price cap adjustment for all service areas of the former Cambridge & North Dumfries Hydro. However, the OEB approved a price cape adjustment of 0.00% for the service area of the former Brant County Power for 2018 as requested by Energy +.

The OEB should not approve any other "Exceptions" as OEB did in the past by increase a fouryear monthly increase of \$4.37 which exceeded the threshold of \$4.00 and over the threshold of 10% for the Brant County customers. This is in fact in breach of the contract purchase and sale agreement between Cambridge N. Dumfries Hydro and Brant County Power.

I request that OEB do not further make any exceptions to Energy +.

Seniors cannot afford a \$2.43 per month or Est. \$30.00 impact per year with hydro cost. Over 55% of Cambridge citizens are Seniors which would create low income senior more stress to pay their bills.

Small business customer using approximately 2000 kilowatt hours of electricity per month in Cambridge or North Dumfries could see an increase of \$12.05 per month, in their hydro cost. This may impact businesses in Cambridge to reduce jobs, which Cambridge cannot afford to loss more jobs because over 1500 jobs are gone since 2017. Energy + can't just keep putting the public in poverty.

Sandra Hill.

Business owner Dream Home Mortgages in the City of Cambridge.



FNFRGY+ INC.

1500 Bishop Street, P.O. Box 1060, Cambridge, ON N1R 5X6 • Telephone 519-621-3530 • Fax 519-621-7420 • Telephone 519-442-2215 • Toll Free 1-877-871-2215 •

August 31, 2018

Ms. Sandra Hill

Dear Ms. Hill:

Thank you for your Letter of Comment submitted to the Ontario Energy Board (OEB) with respect to Energy+ Inc.'s proposed Cost of Service Rate Application for changed rates effective January 1, 2019. We appreciate all customer feedback and the time you took to submit your comments.

You have raised several concerns in your Letter of Comment, which Energy+ would like the opportunity to respond to and provide additional information that we hope you would find helpful in gaining a better understanding of our Application.

Energy+ Inc. has prepared a presentation that summarizes the key elements of the Application, which was presented at the July 11th Community Meeting hosted by the OEB. The presentation can be found on our website at the following link: https://www.energyplus.ca/en/myhome/2019-cost-of-service-rate-application.asp

With respect to the proposed plan to harmonize the rates for Cambridge North Dumfries customers and County of Brant customers, Energy+ Inc. recognizes that under this proposal, some customers will pay more, and some customers will pay less. This adjustment, however, will ensure that all customers within a customer class are paying the same rate for the services they receive from Energy+ commencing in 2019. In making this proposal, Energy+ considered that all customers within a customer class, regardless of the where you live, receive the exact same services, expect the same level of customer service, and expect the same levels of reliability.

As requested by the OEB as part of this Application, Energy+ has prepared a calculation of the estimated distribution rates for Cambridge North Dumfries customers, as if the amalgamation transaction had not occurred. The results demonstrate that the proposed residential distribution customer rates requested in the rate application, are approximately \$1.12 less in 2019, than they would have otherwise been, in the absence of the joining together of the two utilities.

All customers have benefited from the amalgamation and the creation of Energy+. Since the amalgamation, Energy+ has achieved operating cost savings and efficiencies. By way of illustration, the 2019 proposed operating expenditures of Energy+ are \$18.6MM, compared to the 2014 combined operating expenditures of \$18.4MM, representing an increase of only 0.9% over a five year period, which is well below inflation over the same time period. Energy+ believes that a less than 1% increase in proposed operating expenditures over five years demonstrates our commitment to successfully controlling costs, in alignment with customer stated preferences.

The OEB expects a utility to file a proposal for rate harmonization at the time of its next Cost of Service Application following a merger or acquisition. As part of the acquisition of the former Brant County Power Inc. in 2014, Energy+ committed to harmonizing the rates in 2019.

Page 2 August 31, 2018 Ms. Sandra Hill

You are correct that, commencing in 2016, the OEB introduced a mandatory transition for all local distribution companies to shift the residential and small commercial delivery charge from a fixed and volumetric charge to a fixed charge over four years. The 2016 rate change reflects the stepped increase to the fixed charge and at the same time a decrease in the volumetric charge. The increase in the fixed charge for Brant County customers was \$4.37, with a corresponding decrease in the variable rate of \$0.0053 per kWh. Energy+ acknowledges that the fixed monthly increase of \$4.37 for low volume customers in the Brant Service Territory over a four year period exceeded the \$4.00 threshold set by the OEB. As Energy+ outlined in its 2016 Rate Application, the proposal to transition over a four year period for both Cambridge and North Dumfries and Brant County customers more closely aligned to the expectation for rate harmonization in 2019 by having a consistent period of transition between the service territories. This proposal was previously approved by the OEB.

A distributor normally applies to the Ontario Energy Board for a Cost of Service rate application every five years to set rates. The years in-between allow for an inflationary increase less a productivity factor. For rates effective May 1, 2018, the OEB approved a 0.9% rate increase for the Cambridge North Dumfries service territory and 0.0% for the Brant service territory. The 0.0% rate change for the Brant County customers was based on the commitment at the time of purchase to not apply for a rate increase for Brant County customers until the next Cost of Service rate application, expected in 2019. Energy+ has met that commitment.

We understand that Seniors and other customers on fixed incomes have difficulty paying their hydro bill. Energy+ has many programs and initiatives designed to help our customers with their electricity bills. We offer information and encourage customers to enroll in low income or emergency funding programs, including the Low-Income Energy Assistance Program, the Affordability Fund, and the Ontario Energy Support Program.

Our Energy Efficiency team offers many energy saving tips, tools and programs to help reduce energy use and save on electricity. Energy+ is also proud of My Account online that provides customers with the ability to view their hourly electricity usage to monitor when and how they are using electricity. The My Account online also provides an online library with energy saving information.

Similarly, the Energy+ team encourages small business customers to take advantage of Energy Saving programs and to sign up for My Account online. Details are available at www.energyplus.ca.

I would be pleased to address any additional questions or concerns that you may have. I can be reached at shughes@energyplus.ca or 519-621-3530 Ext. 2638.

Sincerely, ENERGY+ INC.

Sarah Hughes, CPA, CA, C.Dir. Chief Financial Officer

Letter of Comment: Mary Mitchell

- -- Comment date --2018-07-04
- -- Case Number --FB-2018-0028
- -- Name --Mary Mitchell
- -- Phone --
- -- Company --
- -- Address --
- -- Comments --

I am writing to you to express my concern over the proposed rate change by Energy+ Inc.

An insert in my hydro bill tells me that if the change is approved I can expect my hydro bill to increase by \$2.43. While this does not sound like much it applies to the distribution rate which is one out of six lines of charges on my hydro bill. This means that the distribution rate will increase 9.28% which is well above the rate of inflation.

The insert tells me only that Energy+ has applied for a change to the distribution rate. A recent newspaper article about the increase states that if I want to know more I have to go to the OEB website. On that website it states that Energy+ Inc "has also applied to introduce a new standby charge" and that "the proposal to harmonize rates and charges will also result in changes to certain specific service charges" but there is no indication of how much this means to the consumer.

I did go to read more about the application to determine if this means another, obscure increase to the hydro bill. I really believe that consumers should not have to go digging about on a website to find the facts behind these rate increase proposals and that it should be laid out very clearly what is affected and what is not. There are currently more than 50 documents and I should not have to wade through each and every one to find out clear and concise rate change information.

Furthermore, I do not think that harmonizing the rates between Cambridge and North Dumfries customers and Brant County customers is a valid reason for the increase. When Energy+ Inc bought over the Brant County hydro in 2014 it must have known that the distribution rate there was higher. Why do they think it is acceptable to now pass this discrepancy on to Cambridge and North Dumfries customers? This should have been dealt with over the past four years by gradually decreasing the Brant distribution rate as a cost of doing business.



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August 31, 2018

Ms. Mary Mitchell

Dear Ms. Mitchell:

Thank you for your Letter of Comment submitted to the Ontario Energy Board (OEB) with respect to Energy+ Inc.'s proposed Cost of Service Rate Application for changed rates effective January 1, 2019. We appreciate all customer feedback and the time you took to submit your comments.

You have raised concerns with respect to the proposed rate change and the complexity of the application. Energy+ would like the opportunity to respond to and provide additional information that we hope you will find helpful in gaining a better understanding of our Application.

We appreciate the rate application is very complicated. This arises because Energy+ must provide detailed evidence in response to the OEB's Filing Requirements – to ensure that the OEB has sufficient information upon which to make a decision.

To assist our customers (like you) in making sense of the application, Energy+ Inc. has prepared a presentation that summarizes the key elements of the Application, which was presented at the July 11th Community Meeting hosted by the OEB. The presentation can be found on our website at the following link: https://www.energyplus.ca/en/myhome/2019-cost-of-service-rate-application.asp

The presentation explains the proposed rate impact. It also provides clarity with respect to the proposed standby charge. The standby charge is applicable only to commercial customers with generation facilities that require Energy+ to deliver electricity, when required, if the generation facility does not produce the customer's required needs.

With respect to the proposed plan to harmonize the rates for Cambridge North Dumfries customers and County of Brant customers, Energy+ Inc. recognizes that under this proposal, some customers will pay more, and some customers will pay less. This adjustment, however, will ensure that all customers within a customer class are paying the same rate for the services they receive from Energy+ commencing in 2019. In making this proposal, Energy+ considered that all customers within a customer class, regardless of the where you live, receive the exact same services, expect the same level of customer service, and expect the same levels of reliability.

As requested by the OEB as part of this Application, Energy+ has prepared a calculation of the estimated distribution rates for Cambridge North Dumfries customers, as if the amalgamation transaction had not occurred. The results demonstrate that the proposed residential customer distribution rates requested in the rate application, are approximately \$1.12 less in 2019, than they would have otherwise been, in the absence of the joining together of the two utilities.

Page 2 August 31, 2018 Ms. Mary Mitchell

All customers have benefited from the amalgamation and the creation of Energy+. Since the amalgamation, Energy+ has achieved operating cost savings and efficiencies. By way of illustration, the 2019 proposed operating expenditures of Energy+ are \$18.6MM, compared to the 2014 combined operating expenditures of \$18.4MM, representing an increase of only 0.9% over a five-year period, which is well below inflation over the same time period. Energy+ believes that a less than 1% increase in proposed operating expenditures over five years demonstrates our commitment to successfully controlling costs, in alignment with customer stated preferences.

I would be pleased to address any additional questions or concerns that you may have. I can be reached at shughes@energyplus.ca or 519-621-3530 Ext. 2638.

Sincerely, ENERGY+ INC.

Sarah Hughes, CPA, CA, C.Dir. Chief Financial Officer

Letter of Comment: Richard Phillips

From: Webmaster

Sent: Friday, June 1, 2018 7:31 PM To: registrar < registrar@oeb.ca > Subject: Letter of Comment -

The Ontario Energy Board

-- Comment date --2018-06-01

-- Case Number --EB-2018-0028

-- Name --Richard Phillips

-- Phone --

-- Company --

-- Address --

-- Comments --

I object to any and all increases in distribution rates and service charges by Energy+. As a consumer, I should not be expected to pay to "harmonize"

the January 2016 purchase of Brant County Power Inc. and Cambridge and North Dumfries Hydro Inc. Present Delivery and Regulatory charges are too high; there should be no increase. My residential delivery and regulatory charges ALWAYS outweigh my charges for my smart-metered Time-of-Use consumption EVERY month. I do track and calculate my bills monthly and my electricity charges NEVER exceed the delivery and regulatory charges. I'm sure that Energy + can reduce the salaries and benefits of their executives, and reduce the profits and distribution to their shareholders, even if that seems to be mostly The City of Cambridge in order to not increase consumers' costs.



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August 31, 2018

Richard Phillips

Dear Mr. Phillips:

Thank you for your Letter of Comment submitted to the Ontario Energy Board (OEB) with respect to Energy+ Inc.'s proposed Cost of Service Rate Application for changed rates effective January 1, 2019. We appreciate all customer feedback and the time you took to submit your comments.

You have raised concerns with respect to the proposed increases in distribution rates and service charges. You also expressed concern with the amount of the Delivery and Regulatory Charges as compared to the cost of electricity. Energy+ would like the opportunity to respond to and provide additional information that we hope you will find helpful in gaining a better understanding of our Application.

Energy+ Inc. has prepared a presentation that summarizes the key elements of the Application, which was presented at the July 11th Community Meeting hosted by the OEB. The presentation can be found on our website at the following link: https://www.energyplus.ca/en/myhome/2019-cost-of-service-rate-application.asp

The presentation includes a detailed sample bill that outlines the various line items on a typical Residential customer, effective January 1, 2019. The sample bill identifies the fact that Energy+ retains 25% of the total bill, a portion of the Delivery line item. All other charges (Electricity, a portion of Delivery, Regulatory and Taxes) are a pass through, with Energy+ collecting the fees and passing them on without markup.

With respect to the proposed plan to harmonize the rates for Cambridge North Dumfries customers and County of Brant customers, Energy+ Inc. recognizes that under this proposal, some customers will pay more, and some customers will pay less. This adjustment, however, will ensure that all customers within a customer class are paying the same rate for the services they receive from Energy+ commencing in 2019. In making this proposal, Energy+ considered that all customers within a customer class, regardless of the where you live, receive the exact same services, expect the same level of customer service, and expect the same levels of reliability.

As requested by the OEB as part of this Application, Energy+ has prepared a calculation of the estimated distribution rates for Cambridge North Dumfries customers, as if the amalgamation transaction had not occurred. The results demonstrate that the proposed residential customer distribution rates requested in the rate application, are approximately \$1.12 less in 2019, than they would have otherwise been, in the absence of the joining together of the two utilities.

Page 2 August 31, 2018 Mr. Richard Phillips

All customers have benefited from the amalgamation and the creation of Energy+. Since the amalgamation, Energy+ has achieved operating cost savings and efficiencies. By way of illustration, the 2019 proposed operating expenditures of Energy+ are \$18.6MM, compared to the 2014 combined operating expenditures of \$18.4MM, representing an increase of only 0.9% over a five-year period, which is well below inflation over the same time period. Energy+ believes that a less than 1% increase in proposed operating expenditures over five years demonstrates our commitment to successfully controlling costs, in alignment with customer stated preferences.

As a regulated utility, Energy+'s profits are determined based on a rate of return as set by the OEB. Distribution rates are set based on the cost of providing the services to customers, plus a rate of return (profit) to the shareholder. Energy+ reinvests approximately 50% of its profits on an annual basis in the business and the remainder is paid out in the form of an annual dividend to its owners, the City of Cambridge and the Township of North Dumfries. These dividends are used to fund services such as road maintenance, public transit, parks and other municipal programs.

I would be pleased to address any additional questions or concerns that you may have. I can be reached at shughes@energyplus.ca or 519-621-3530 Ext. 2638.

Sincerely, ENERGY+ INC.

Sarah Hughes, CPA, CA, C.Dir. Chief Financial Officer

Letter of Comment: Brad Smith

- -- Comment date --2018-07-11
- -- Case Number --EB-2018-0028
- -- Name --Brad Smith
- -- Phone --
- -- Company --Mr
- -- Address --

-- Comments --

This seems to me like a last ditch effort to lock in higher rates to boost their bottom line before the newly elected government can begin their attempt to bring Ontario electrical rates back to reasonable levels. Wholeheartedly disagree.



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August 31, 2018

Brad Smith

Dear Mr. Smith:

Thank you for your Letter of Comment submitted to the Ontario Energy Board (OEB) with respect to Energy+ Inc.'s proposed Cost of Service Rate Application (the "Application") for changed rates effective January 1, 2019. We appreciate all customer feedback and the time you took to submit your comments.

You have raised concerns with respect to the proposed rate change, including the timing of the submission of the Application, to the OEB. Energy+ would like the opportunity to respond to and provide additional information that we hope you will find helpful in gaining a better understanding of our Application.

A distributor normally applies to the OEB for a Cost of Service rate application every five years to set distribution rates. Energy+ last filed a Cost of Service Application in 2014, and committed to the filing of a 2019 Cost of Service Application as part of the amalgamation between the former Cambridge and North Dumfries Hydro Inc. and Brant County Power Inc. in the latter part of 2014. Energy+ submitted its Application on April 30, 2018.

Energy+ Inc. has prepared a presentation that summarizes the key elements of the Application, which was presented at the July 11th Community Meeting hosted by the OEB. The presentation can be found on our website at the following link: https://www.energyplus.ca/en/myhome/2019-cost-of-service-rate-application.asp.

As a regulated utility, Energy+'s profits are determined based on a rate of return as set by the OEB. Distribution rates are set based on the cost of providing the services to customers, plus a rate of return (profit) to the shareholder. Energy+ reinvests approximately 50% of its profits on an annual basis in the business and the remainder is paid out in the form of an annual dividend to its owners, the City of Cambridge and the Township of North Dumfries. These dividends are used to fund services such as road maintenance, public transit, parks and other municipal programs.

We encourage you to review the contents of the presentation, including the slides that outline the proposed operating expenditures, capital investments, as well as information with respect to the historical and proposed Residential Distribution Charges for each service territory, from 2011 to the 2019 proposed rate change, and a comparison of Energy+'s proposed distribution rates with other local distribution companies.

I would be pleased to address any additional questions or concerns that you may have. I can be reached at shughes@energyplus.ca or 519-621-3530 Ext. 2638.

Sincerely, **ENERGY+ INC.**

Sarah Hughes, CPA, CA, C.Dir. Chief Financial Officer

Letter of Comment: Len Drew



LETTER OF COMMENT FOR RATE APPLICATION

By signing and submitting this document to the Ontario Energy Board (OEB), you agree to have your name, your comments and any documents you provide made public on the OEB's website and shared as part of the public record in the case (case number entered by you below).

Any personal contact information (such as your telephone number, home address and email address) WILL NOT be made public on the OEB's website or otherwise shared with any person outside of the OEB.

PLEASE PRINT

* required fields

* Case Number:	EB-2	018-0028				
Utility Name:	ENERGY+	NC.				
Circle one:	Mr. Mrs.	Ms.	Miss	Dr.		
* First Name	_ LEN			* Last Name	DREW	
Company Name						
* Email address						
* Phone number						
* Mailing address						
Street, City, Postal Code						
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If you are submitting a comment on behalf of a business, any business contact information WILL be made public on this website and shared as part of the public record of the case named above.



2300 Yonge Street, 27th floor, P.O. Box 2319, Toronto, ON, M4P 1E4 T 416-481-1987 1-888-632-6273 2300, rue Yonge, 27th étage, C.P. 2319, Toronto (Onlario) M4P 1E4 F 416-440-7656 **OEB.ca**

2018-03



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August 31, 2018

Len Drew

Dear Mr. Drew:

Thank you for your Letter of Comment submitted to the Ontario Energy Board (OEB) with respect to Energy+ Inc.'s proposed Cost of Service Rate Application (the "Application") for changed rates effective January 1, 2019. We appreciate all customer feedback and the time you took to submit your comments.

You have raised concerns with respect to Energy+ Inc. applying for a distribution rate change. As you have outlined, "Major reason for election change was promise to reduce energy rates. New government is in power so how can we make decision to support rate increases/change when Ontario Government Policy is to reduce rates". Energy+ would like the opportunity to respond to and provide additional information that we hope you will find helpful in gaining a better understanding of our Application.

You are correct, electricity issues were one of the focal themes in the recent provincial government campaign and were identified as a priority in the Progressive Conservative platform. However, the reductions in "energy rates" that were discussed were focused on the electricity portion of the total monthly bill to customers. To be clear, the provincial government promises and/or proposed changes relating to energy, had no impact on Energy+'s decision to file the Cost of Service Rate Application. The Application is driven by a requirement to rebase our distribution rates to recover costs and continue to invest in our infrastructure. These investments ensure a robust distribution network and the delivery of customer services aligned to customer stated needs and preferences.

A distributor normally applies to the OEB for a Cost of Service rate application every five years to set distribution rates. Energy+ last filed a Cost of Service Application in 2014, and therefore was scheduled and required to file a 2019 Cost of Service Application.

Energy+ Inc. has prepared a presentation that summarizes the key elements of the Application, which was presented at the July 11th Community Meeting hosted by the OEB. The presentation can be found on our website at the following link: https://www.energyplus.ca/en/myhome/2019-cost-of-service-rate-application.asp.

The presentation includes a detailed sample bill that outlines the various line items on a typical Residential customer bill, effective January 1, 2019. The sample bill identifies the fact that Energy+ only retains 25% of the total bill, a portion of the Delivery line item. All other charges (Electricity, a portion of Delivery, Regulatory and Taxes) are a pass through, with Energy+ collecting the fees and passing them on without markup. The proposed reduction in energy rates during the recent campaign was referencing those portions on the hydro bill not related to Energy+'s distribution fees.

In addition, you expressed concern regarding the proposed rate change and impact on commercial customers. As outlined in the presentation, a new Standby charge has been proposed that applies only to commercial customers with generation facilities. The charge, if approved, would only apply if the customer wants Energy+ to act as a back-up to deliver power to the customer's facilities, if their generation is not able to generate the energy that they need. A Standby Rate has been proposed in the interest of being fair to all customers in the service territory – residential, small business, commercial and industrial. As Energy+ is required to maintain the wires, poles, and infrastructure "on standby" in case the customer needs to draw on an agreed upon block of power, there is a cost to keeping the infrastructure in place.

I would be pleased to address any additional questions or concerns that you may have. I can be reached at shughes@energyplus.ca or 519-621-3530 Ext. 2638.

Sincerely,

ENERGY+ INC.

Sarah Hughes, CPA, CA, C.Dir. Chief Financial Officer