



December 4, 2018

VIA RESS, E-MAIL and COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Electricity Distribution Licence No. ED-2002-0556
2019 Electricity Distribution Rate Application (EB-2018-0044) Comments on
draft Decision and accompanying draft Rate Order**

On November 30, 2018 the Ontario Energy Board (“OEB”) provided Hydro Ottawa Limited (“Hydro Ottawa”) a letter and draft Decision and accompanying draft Rate Order for Hydro Ottawa’s 2019 rates, effective January 1, 2019. The letter directed Hydro Ottawa to review the draft Decision and accompanying draft Rate Order and provide any comments by December 4, 2018.

Please find Hydro Ottawa’s comments for OEB consideration.

1. Hydro Ottawa suggests that on page 6 of the draft order that the wording be adjusted to indicate the average inflationary rate is calculated to be 1.71%.
2. On page 7 under the heading “Findings”, the approval references Hydro Ottawa’s 2018 revenue requirement rather than the 2019 revenue requirement.
3. On page 12 of the decision, the OEB refers to Hydro Ottawa’s wording of “administrative issue”. Hydro Ottawa wishes to clarify that the administrative issue is that Hydro Ottawa does not have evidence of receiving the customer’s e-mail, while the customer has provided a copy of a sent e-mail. Hydro Ottawa request that the wording be adjusted to say “administrative issue (non-receipt)” to clarify the situation.
4. On page 14 within the findings related to Group 1 deferral and variance accounts, the following sentence can be found “With respect to the ICI enrollment matter, the OEB notes that the customer in question has paid approximately \$700,000 more in global adjustment costs than it otherwise would have paid had Hydro Ottawa enrolled the customer’s two properties by the established deadline.” Hydro Ottawa suggests the wording be adjusted to “With respect to the ICI enrollment matter, the OEB notes that the

Hydro Ottawa Limited / Hydro Ottawa limitée
3025 Albion Road North, PO Box 8700 / chemin Albion Nord, C.P. 8700
Ottawa, Ontario K1G 3S4

www.hydroottawa.com





customer in question has paid approximately \$700,000 more in global adjustment costs than it otherwise would have paid had the customer's two properties been enrolled effective July 1, 2017."

5. Also within the findings related to Group 1 deferral and variance accounts, on page 16, the OEB approves the disposition of rate riders and payments effective over a one-year period. Hydro Ottawa requested in Exhibit 9, Tab 2, Schedule 1, page 6 of the its 2019 rate application to apply Class A transitioning adjustments through a one-time adjustment. Hydro Ottawa requests that the decision clarify if the OEB considered this request and if the OEB intends to approve the request.

6. On page 17, Hydro Ottawa suggests adding to the last sentence of the cost allocation description, "and cost of capital parameters have been adjusted." The full sentence would be, "The miscellaneous revenue in the 2019 cost allocation model, filed as part of the 2015 Settlement Agreement, has been updated in this proceeding as per the Pole Attachment Decision and the agreed upon mid-term adjustment on the inflation rate and cost of capital parameters have been adjusted."

7. The Dry Core Transformer Charges are mentioned in the draft Decision; however, they are missing from the draft Rate Order.

Please do not hesitate to contact me if you require anything further.

Respectfully,

Original approved by Gregory Van Dusen

Gregory Van Dusen
Director, Regulatory Affairs
Tel. / tél. 613-738-5499 | ext. / poste 7472
regulatoryaffairs@hydroottawa.com