

December 19, 2018

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

Dear Ms. Walli:

Re: EB-2018-0243 – Ontario Power Generation Inc. – 2017 Deferral and Variance Accounts

We are representing the Consumers Council of Canada (“Council”) in the above-referenced proceeding. On December 13, 2018, the Ontario Energy Board (“OEB”) issued Procedural Order No. 3 providing a schedule for OPG and the intervenors to make submissions on the draft issues list.

These are the submissions of the Council on the draft list. The Council proposes that the following issue be added to the list:

Is OPG’s proposal to defer consideration of all future balances in its deferral and variance accounts, including the balances in 2018 accounts and some 2017 accounts, until its next rebasing in 2022 appropriate?

It is OPG’s evidence that it will defer any consideration of future balances until its next rebasing application.¹ The Council is concerned that given the magnitude of the amounts that typically accumulate in OPG’s deferral and variance accounts, customers may be faced in 2022 with significant balances for recovery. We are of the view it is important in this proceeding to consider this issue and consider options to avoid what could potentially be significant rate shock for Ontario electricity customers in 2022. Even if a smoothing approach is proposed in 2022, this would push out recovery of balances accumulated from 2017-2020 beyond 2022, which raises issues of intergenerational inequity. The Council would like to explore options to deal with the clearance of current and future balances in this proceeding.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC: All parties

¹ EB-2018-0243 - Technical Conference Transcript, November 29, 2018, pp. 21-23