



PUBLIC INTEREST ADVOCACY CENTRE
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December 19, 2018

VIA E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Toronto, ON

Dear Ms. Walli:

**Re: EB-2018-0243 2019 Annual Hydroelectric Payment Amount Adjustment and Clearance of Deferral and Variance Account Balances as at December 31, 2017
VECC Submissions on the Proposed Issues List**

VECC agrees with the Staff proposed issues list with the addition of the issue proposed by the Consumers Council of Canada:

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?

We are also entirely in agreement with the submission of the School Energy Coalition on this matter.

It is our submission that it is entirely within the discretion of the Ontario Energy Board to determine both the amount and the period for the disposition of deferral and variance accounts. In our view the Board has an obligation to consider both the prudence of the amount and, in consideration of the intergenerational equities and rate impacts, the timing of review and disposition of regulatory accounts. This has been common practice in both natural gas and electricity distribution regulation by the Board. We can find no impediments as to why it would not also be the same for the regulation of OPG.

All of which is respectfully submitted.

Mark Garner/ for VECC-PIAC

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