



Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Boardsec@oeb.ca

December 27, 2018

Sent via RESS and Email

Dear Ms. Walli,

RE: Comments from Brantford Power Inc. ("BPI") on Draft Rate Order in EB-2018-0020

Pursuant to the OEB's Decision and Order released on December 20, 2018 in the above-mentioned case (the "BPI IRM Decision"), BPI has reviewed the Tariff of Rates and Charges set out in Schedule A. BPI confirms its completeness and accuracy, with some exceptions which are listed below.

1. Decision on Regulatory Charges

On December 20, 2018 the OEB also issued a Decision and Order regarding Wholesale Market Service (WMS) Rates and Rural or Remote Electricity Rate Protection Charge (RRRP) (EB-2018-0294, The "Regulatory Charges Decision"). In the Regulatory Charges Decision, the OEB issued updated WMS Rate of \$0.0030/kWh and RRRP Charge of \$0.0005/kWh which it directed electricity distributors to charge effective January 1, 2019. In compliance with the OEB's direction, BPI will charge the updated regulatory charges and requests that the OEB update BPI's Tariff of Rates included as Schedule A to the BPI IRM Decision to be consistent.

2. Bill Impact Calculations

The bill impact calculations for the Residential Class included in tab 20 of the Rate Generator model accompanying the BPI IRM Decision include an entry of \$0.0003/kWh in the proposed Additional Volumetric Rate Riders line (cell I-102) which does not correspond to any of the rates on the Tariff, and BPI believes should be removed.

Additionally, the Proposed CBR Class B rate Rider of \$(0.0002)/kWh is missing from the calculations (cell I-97) and BPI believes it should be added into the calculation. BPI notes that the Rate Rider for Disposition of Global Adjustment Account (2019) is correctly excluded on this bill impact calculation, as the typical Residential customer is an RPP customer and does not receive this rate rider which is applicable only to non-RPP customers. BPI requests that the OEB provide an updated set of bill impact calculations reflecting these corrections. BPI believes the resultant total bill impacts for the typical residential customer will be a total bill decrease of \$(1.37), or \$(1.30) when expressed before tax and 8% rebate.



3. Decision and Interim Rate Order – 2019 Uniform Transmission Rates

The OEB issued its Decision and Interim Rate Order on 2019 Uniform Transmission Rates (the “Decision on UTRs”) on December 20, 2018. In its Decision the OEB acknowledges that LDCs typically update their RTSRs either on January 1 or May 1 of each year and that, “The new interim UTRs will be taken into account when new RTSRs are approved effective May 1, 2019.”

Consistent with the OEB’s direction, BPI requests that the RTSRs currently included in Schedule A of the BPI IRM Decision remain as they are. This will allow BPI to bill the updated rates with the implementation date of January 1, 2019, as billing implementation preparations for these rates are well underway, and updated rates would require restarting several time-intensive steps.

As outlined in the Decision on UTRs, BPI will use the existing variance accounts for Transmission charges to capture any differences between transmission costs and the transmission costs received from customers. As the impacts of the interim 2019 UTRs offset one another¹, BPI’s calculations indicate that the impact of the updated interim UTRs on the forecasted wholesale billings would be non-material.

BPI notes the Tariff of Rates and Charges included as Schedule A to the BPI IRM Decision correctly reflects the updated Specific Service Charge for Access to the Power Poles of \$43.63.

BPI requests that OEB issue a Rate Generator model with the updates to the Bill Impacts as described in section 2, and an updated Tariff with the changes described in section 1.

Sincerely,

Original Signed By

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¹ Network Service increase of \$0.1/kW is offset by decreases in the Line Connection Service (\$0.01/kW) and Transformation Connection Service (\$0.09/kW) Rates, *Decision and Interim Rate Order in EB-2018-0326*, p.3