



BY EMAIL

November 18, 2019

Graig Pettit  
ERTH Power Corporation  
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Dear Mr. Pettit:

**Re: ERTH Power Corporation - Application for 2020 Rates  
Ontario Energy Board File No. EB-2019-0033**

A preliminary review of the application has identified that certain sections of the evidence supporting the application do not comply with the Ontario Energy Board's Filing Requirements<sup>1</sup> for incentive rate-setting applications and/or the associated spreadsheets, models and workforms. As a result, the Ontario Energy Board (OEB) is unable to process ERTH Power Corporation's application at this time. The OEB will commence processing the application after the noted information is filed.

The missing information includes:

Chapter 3 Filing Requirement Reference (page #)	Description
Page 14	A distributor must support its GA claims with a description of its settlement process with the IESO or host distributor. The application does not include information related to the following: <ul style="list-style-type: none"><li>i. The GA prices the distributor uses to bill (and record unbilled entries) to its various customer classes (i.e. 1st estimate, 2nd estimate or actual). As part of this description, the distributor</li></ul>

<sup>1</sup> Chapter 3 of the *Filing Requirements for Electricity Distribution Applications Rate Applications*, dated July 12, 2018 and the Addendum to Filing Requirements For Electricity Distribution Rate Applications - 2020 Rate Applications, dated July 15, 2019

	<p>shall confirm that the GA rate that is used is applied consistently for all billing and unbilled revenue transactions for non-RPP Class B customers in each customer class. In addition, where the same GA rate is not used for non-RPP Class B customers in all customer classes, the distributor shall explain what GA rate is applied to each customer class</p> <ul style="list-style-type: none"> <li>ii. Description of treatment of volumes related to embedded generation or embedded distribution customers</li> <li>iii. Description of EARTH Power Corporation's internal control tests, if any, in validating estimated and actual consumption figures used in RPP settlement process and subsequent true-up adjustments</li> </ul>
Addendum, Page 12	<p>Information related to Accounts 1588 and 1589 per the Addendum, which states: "On February 21, 2019, the OEB issued its letter entitled Accounting Guidance related to Accounts 1588 Power, and 1589 RSVA Global Adjustment as well as the related accounting guidance. The accounting guidance is effective January 1, 2019 and is to be implemented by August 31, 2019. Distributors are expected to consider the accounting guidance in the context of historical balances that have yet to be disposed on a final basis (including the 2018 balances that may be requested for disposition in this rate application). In this application, distributors are to provide a status update on the implementation of the new accounting guidance, a review of historical balances, results of the review, and any adjustments made to account balances."</p>

The OEB expects that EARTH Power Corporation will file the above listed required information as soon as possible.

If any of the information that is identified as missing is located in sections other than those identified in the Filing Requirements, or if any of the information is not applicable in your circumstances, please provide an explanation when re-filing the application.

Any questions relating to this letter should be directed to Katherine Wang at [katherine.wang@oeb.ca](mailto:katherine.wang@oeb.ca) or at 416-440-7619. The OEB's toll-free number is 1-888-632-6273.

Yours truly,

*Original signed by*

John Pickernell  
Manager, Applications Administration