

December 17, 2019

VIA RESS AND COURIER

Ms. Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street
26th Floor, Box 2319
Toronto, ON M4P 1E4

Dear Ms. Long;

**RE: APPLICATION BY ALECTRA UTILITIES CORPORATION FOR DISTRIBUTION RATES
EFFECTIVE JANUARY 1, 2020 (EB-2019-0018)**

On May 28, 2019, Alectra Utilities filed an application with the Ontario Energy Board (“OEB” or the “Board”) under Section 78 of the *Ontario Energy Board Act, 1998* as amended and pursuant to the OEB’s *Filing Requirements for Incentive Rate-setting Applications* seeking approval for electricity distribution rates, and other charges, effective January 1, 2020. The Board assigned File Number EB-2019-0018 to the Application.

The Board issued a Partial Decision and Interim Rate Order (“the Decision”) on this matter on December 12, 2019. The Board directed Alectra Utilities to file a written confirmation of the completeness and accuracy of the Interim Rate Order. In the event that there were issues identified, the OEB directed Alectra Utilities to provide a detailed explanation of any inaccuracies or missing information by December 17, 2019. Alectra Utilities provides its comments related to items in the Interim Rate Order, below:

1 Rate Generator Model (“RGM”) - Rate Accuracy

Alectra Utilities finds that the rates produced within the OEB-provided RGM models are complete and accurate.

2 Rate Generator Model - Bill Impacts

Alectra Utilities has identified the following issues regarding the RGM Bill Impacts, Tab 20:

- General, all rate zones
 - OER 31.8% rebate should apply to USL and Sentinel Lighting; this is currently not captured.

- Guelph
 - Additional volumetric riders for GS 50-999, GS 1000-4999 and Street Lighting should be billed on kWh, not kW (cell G214, G270, G550).

3 Tariff of Rates and Charges

Alectra Utilities has reviewed the Tariff of Rates and Charges appended to the Decision, and finds the rates to be accurate and complete. Alectra Utilities observes the following issues regarding the rate descriptions:

- Enersource
 - GA and CBR riders no longer have descriptor “[applicable only for] Non-Wholesale Market Participants”.
- PowerStream
 - GA and CBR riders no longer have descriptor “[applicable only for] Non-Wholesale Market Participants”.

Two hard copies of Alectra Utilities’ comments will be delivered to the OEB via courier. An electronic copy of Alectra Utilities’ comments is being filed using the Board’s RESS filing system.

Should you have any questions or require additional information, please do not hesitate to contact me.

Yours truly,

[Original Signed By]

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cc: Charles Keizer, Torys LLP