

April 14, 2020

VIA RESS AND EMAIL

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) – REQUEST FOR INCREMENTAL CAPITAL FUNDING AND FINAL RATE ORDER

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 Order (the “Partial Decision”) on Alectra Utilities’ M-factor proposal on January 30, 2020. At page 28 of the Partial Decision, the OEB provided the following three options for Alectra Utilities’ consideration related to requests for incremental capital funding:

1. File a cost-based application for rates effective in 2021 proposing updated capital requirements, in which case the rebasing deferral period would be terminated;
2. Amend the current application to request incremental capital funding in 2020 for projects that meet the ICM criteria. Further, the OEB provided that Alectra Utilities may consider a multi-year ICM; and
3. File an application for 2021 rates, in which Alectra Utilities would be eligible to request incremental capital funding through an ICM. The current 2020 interim rates would be made final upon request by Alectra Utilities.

On February 27, 2020, Alectra Utilities filed a letter with the OEB indicating that it will amend its current application to request incremental capital funding for 2020 projects that meet the ICM criteria. Alectra Utilities also indicated that it continues to evaluate whether it will seek incremental capital funding for other years, as part of this amendment to the application.

Since that time, in response to the COVID-19 global pandemic, the Government of Ontario has declared a state of emergency. Management is continuing to re-evaluate capital requirements as projects are reprioritized within 2020 and beyond. Alectra Utilities will not be seeking incremental capital funding for 2020. As a result, Alectra Utilities requests that its 2020 rate order be made final.

Alectra Utilities Corporation

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In accordance with the OEB's communication of March 16, 2020, Alectra Utilities is filing electronic copies of this submission via email and using the Board's RESS filing system. No hard copies will follow.

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

Yours truly,

A handwritten signature in black ink, appearing to read 'Indy Butany-DeSouza', with a stylized, cursive script.

Indy J. Butany-DeSouza, MBA
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cc: Charles Keizer, Torys LLP
Jonathan Myers, Torys LLP