



Board Secretary
Ontario Energy Board
27th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

April 21, 2020

Dear Ms. Walli,

Re: LONDON HYDRO INC. DECISION AND RATE ORDER EB-2019-0052

On the April 16, 2020 the OEB issued the subject Decision and Rate Order for London Hydro's Application for rates and other charges to be effective May 1, 2020. The Decision provided for implementation of the Tariff of Rates and Charges as set out in Schedule A of the Decision and Rate Order as approved effective May 1, 2020 for electricity consumed or estimated to have been consumed on and after such date

However in light of the COVID-19 emergency, paragraph 2 of the Decision also set out the opportunity for London Hydro to elect that Schedule A of the Decision and Rate Order as approved to be implemented November 1, 2020, provided London Hydro Inc. notifies the OEB under paragraph 4 of the Decision that it is electing to postpone the implementation of its new rates until November 1, 2020.

London Hydro understands that under paragraph 3 that any temporarily forgone distribution revenue associated with the postponement referred to in paragraph 2 may be tracked in Account 1509 - Impacts Arising from the COVID-19 Emergency, Sub-account Lost Revenues.

As instructed under paragraph 4 of the Decision London Hydro Inc. is therefore filing this letter with the OEB indicating we intend to postpone the implementation of the Tariff of Rates and Charges set out in Schedule A of this Decision and Rate Order.

On the April 16, 2020 the OEB also issued a letter with the subject line Approach to Incentive Rate-setting Decisions for May 1, 2020 Rates. London Hydro has extracted below content for consideration.

"Distributors choosing to postpone the implementation of their 2020 rate change to November 1, 2020 will also be deferring the disposition of the pass through variances associated with their commodity and settlement related activities and any other approvals (such as any LRAM claim or a change in their retail transmission service rates) to that date."

"In deciding whether or not to postpone their May 1, 2020 rate change, any distributor that has rate riders expiring on April 30, 2020 will need to consider the change in customer bills that will occur if their new rates are not implemented at this time.

Each distributor will be required to notify the OEB of its intentions with respect to the postponement of the May 1, 2020 change by April 23, 2020."

On the April 17, 2020 the OEB also issued a letter with the subject line Initial Implementation Guidance to Incentive Rate-setting Decisions for May 1, 2020 Rates for Postponing Distributors. London Hydro has extracted below content for consideration.

"The OEB also reminds distributors that any rate riders with April 30, 2020 or future sunset dates on their current (2019) Tariff of Rates and Charges shall cease to have effect following the sunset date, regardless of the implementation choice by a distributor."

Currently London Hydro has in place a Rate Rider for Disposition of Lost Revenue Adjustment Mechanism Variance Account (LRAMVA) (2019) - effective until April 30, 2020. This rate rider will cease to have effect following the sunset date

Therefore, in conclusion, London Hydro respectfully requests herein that the OEB approve London Hydro's current rate order EB-2018-0051 be declared interim and that all rates and other charges originally effective to May 1, 2020 continue to be in place until October 31, 2020. Further, London Hydro request that the OEB approve the April 16, 2020 Decision and Rate Order EB-2019-0052 for London Hydro's Application for rates and other charges to be implemented on November 1, 2020, with the effective date of May 1, 2020. In addition that the OEB allow all rate adjustments including forgone distribution revenue associated with the postponement be tracked in Account 1509 - Impacts Arising from the COVID-19 Emergency, Sub-account Lost Revenues.

Respectfully submitted,



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