September 15th 2020

Board Secretary
Ontario Energy Board
P.O. Box 2319
27th Floor – 2300 Yonge Street
Toronto, ON M4P 1E4

Dear Board Secretary:

Re: SYNERGY NORTH Accounting Order and Guidance for Forgone Revenues from Postponing Rate Implementation Related to the COVID-19 Emergency EB-2019-0068

In the best interest of its customers during April 2020 due to the COVID-19 emergency order, Synergy North Corporation ("SYNERGY NORTH") elected to defer implementation of its Board Approved May 1, 2020 effective rates to November 1, 2020. On April 28, 2020 the Ontario Energy Board ("OEB") approved the proposal and released a Vary Order (EB-2019-0068) to SYNERGY NORTH approving postponing the implementation of new rates until November 1, 2020.

SYNERGY NORTH has reviewed the Ontario Energy Board's Accounting Order for Forgone Revenue as well as the Forgone Revenue Guidance ("the Guidance"), issued August 6, 2020 which addressed electricity distributors who deferred implementation of their May 1, 2020 rates. The Guidance states:

*"If a postponing distributor seeks alternative treatment – whether in regard to its recovery of foregone revenues or in regard to its implementation of May 1, 2020 rates – the distributor may do so by filing a request with the OEB's Board Secretary's Office as soon as possible, or by **September 15, 2020** at the latest. Determinations on alternative treatments will be made on a case by case basis."*

SYNERGY NORTH is thereby formally proposing an alternative treatment for its November 1, 2020 forgone revenue rates and is seeking to establish sub-accounts of "COVID-19 Emergency Account (1509), Forgone Revenue from Postponing Rate Implementation" for each of its rate zones for future determination.

SYNERGY NORTH currently has two rate zones which are divided into:

1) Thunder Bay Rate Zone serving Thunder Bay and Fort William First Nations;
2) Kenora Rate Zone serving Keewatin and Kenora.

SYNERGY NORTH is proposing the same plan to maintain forgone revenue sub account balances for collection later through its 2021 IRM Rate Application, or at the very latest its next

scheduled Cost of Service Application for both rate zones. SYNERGY NORTH has determined that given the current economic climate and continuous uncertainty related to COVID-19 it does not find it prudent to add the additional forgone rate riders to either of its "Tariff of Rates and Charges" at this time.

In accordance with previous correspondence from Vary Order (EB-2019-0068), SYNERGY NORTH submits the following formal request to address the deferral of rates for both of its rate zones.

SYNERGY NORTH proposes to;

- implement the approved May 1st, 2020 Distribution Rates as of November 1st, 2020 through to April 30th, 2021;
- to implement the approved May 1st, 2020 RTSR Rates as of November 1st, 2020 through to April 30th, 2021;
- to implement the approved May 1st, 2020 DVAD Rate Riders as of November 1st, 2020 through to October 31st, 2021;
- to implement the approved May 1st, 2020 Global Adjustment Rate Riders as of November 1st, 2020 through to October 31st, 2021;
- Defer both Monthly Fixed, and Variable Forgone Revenue Rate Riders into the 2021 IRM rate application process (EB-2020-0055) or another future rate decision.

Further to the Board's Forgone Revenue Guidance, an electronic copy of SYNERGY NORTH's "COVID-19 Forgone Revenue Rate Rider Model" excel model for each rate zone will be submitted through the Ontario Energy Board's e-Filing Services along with an external proposed Tariff of Rates and Charges for each rate zone amended to reflect the Implementation Date of November 1, 2020.

If you require any further information, please contact the undersigned at (807) 343-1054.

Sincerely,

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