



BY EMAIL

November 2, 2020

Margaret Maw
Lakeland Power Distribution Ltd.
200-395 Centre St. N
Huntsville, Ontario P1H 2M2
email mmaw@lakelandholding.com

Dear Ms. Maw,

Re: EB-2020-0037 - Lakeland Power Distribution Ltd. - Application for 2021 Rates

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 requirements¹ 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 Lakeland Distribution Power Ltd. (Lakeland Power) 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
Decision and Order EB- 2018-0050, p. 49-50 of 117 (Settlement Agreement)	<p>The Filing Requirements state: "Identification of OEB directions from any previous OEB Decisions and/or Orders. The applicant must clearly indicate how these are being addressed in the current application."</p> <p>As per the OEB's decision in Lakeland Power's 2019 Cost of Service application², the OEB approved the following disposition of Group 1</p>

¹ Chapters 3 of the *Filing Requirements for Electricity Distribution Applications Rate Applications*, dated May 14, 2020

² Decision and Rate Order, EB-2018-0050

pp. 37-38)

and Group 2 accounts account balances during the IRM term:

	2017 Balance	2018 Balance	2019 onwards
Group 1	Separate by area – disposition in 2019 COS	Separate by area – disposition in 2020 IRM	Transactions harmonized from Jan. 1, 2019
Group 2	Separate by area – disposition in 2019 COS	Separate by area – disposition in 2020 IRM – Special request	Transactions harmonized from Jan. 1, 2019
Account 1576	Balance as per App. 2-EC (up to & incl 2018 & return) to be disposed in 2019 COS to former PSP only		

In its current application, Lakeland Power notes that the 2018 Group 2 deferral and variance account (DVA) balances were not disposed of in its 2020 IRM application because the balances were not material. Lakeland Power also notes that the 2018 balances continue to be immaterial and too small to produce a rate rider. Accordingly, Lakeland Power proposes to dispose of the balances on a harmonized basis at its next cost of service application. OEB staff also notes that Lakeland Power has applied for approval to dispose of 2019 balances by rate zone, as follows:

The total claim for the former Parry Sound Service Area is a credit balance of (\$62,454) and does not meet the threshold. The total claim for Lakeland Power without Parry Sound is a credit balance of (\$578,285) and exceeds the threshold.

It is unclear how these requests follow the OEB's Decision and Order in EB-2018-0050. Please provide a status update on the progress towards full harmonization of account balances. Per the OEB's Decision and Order in EB-2028-0050, please include a proposal to address 2018 account balances that are not material. Please update the application and refile the appropriate models."

3.2.6.1

The Filing Requirements state that the OEB will rely on the Participation and Cost Reports and detailed project level savings as supporting documentation when assessing applications for lost revenues in relation to energy and demand savings from programs delivered under the Conservation First Framework where final verified results from the IESO are not available.

Lakeland Power's LRAMVA application includes lost revenue recovery for the 2018 period for both rate zones. However, there were no IESO reports provided in support of the LRAMVA application.

	<p>Please provide the following reports in excel format:</p> <ul style="list-style-type: none"> • 2019 Participation & Cost (P&C) Report • 2017 Final Results Report • 2011-2015 LDC CDM Program Persistence Results Report, or 2014 Persistence Savings Report
LRAMVA workforms – Parry Sound RZ and Lakeland main RZ	<p>OEB staff observes that Tab 3-a of the LRAMVA workforms appear to contain personal information of Lakeland customers. OEB staff notes that there is no filing requirement that requires the filing of such information. Therefore, please refile the workforms by removing any personal information of customers (as that phrase is defined in the <i>Freedom of Information and Protection of Privacy Act</i>). Alternately, if Lakeland Power wishes to include the noted information, it is must file a request for confidentiality in keeping with requirements set out in Rule 9A of the OEB's <i>Rules of Practice and Procedure</i>.</p>

The OEB expects that Lakeland Power 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 birgit.armstrong@oeb.ca or at 416-544-5162. The OEB's toll-free number is 1-888-632-6273.

Yours truly,

Original Signed By

Christine E. Long
Registrar