

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*,  
S.O. 1998, c. 15, (Schedule B);

**AND IN THE MATTER OF** an application by Waterloo North  
Hydro Inc. for an order approving just and reasonable rates  
and other charges for electricity distribution beginning  
January 1, 2021.

**WATERLOO NORTH HYDRO INC.**

**RESPONSES TO PRE-SETTLEMENT CLARIFICATION QUESTIONS**

**NOVEMBER 16, 2020**

## **Board Staff Pre-Settlement Questions**

### **1-Staff-94**

#### **Standby Charge**

#### **Ref 1: 1-Staff-7 Standby**

#### **Question:**

In response to 1-Staff-7, Waterloo North Hydro provided two methodologies for calculating standby charges. Under the variable option, it stated that “The Standby Charge will be applied to the coincident peak load delivered by the LDG on a per kilowatt basis and billed monthly at the distribution volumetric rate for the applicable rate class of the customer.” Under the fixed option, it stated: “The Standby Charge will be applied to the difference between the monthly peak load and a pre-determined Fixed Capacity Reserve value on a per kilowatt basis at the distribution volumetric rate for the applicable rate class of the customer.”

- a) Under the variable option, please clarify whether the volume to billed for standby is:
  - i. The amount of LDG being supplied at the time of the customer’s peak as a result of both the LDG and distribution utility supply.
  - ii. The coincident peak of LDG plus distribution supply less any volume billed for regular distribution supply in the month.
  - iii. Another method (describe).
- b) Please confirm that a customer that qualifies for both the variable and fixed methods of standby charges, the choice between the two is at the customer’s discretion, or explain how the determination would be made.
- c) Under what scenario would each of the first and second option be preferable to the customer?

**Response:**

- a) The volume billed for standby is the amount of LDG being supplied at the time of the customer's peak as a result of both the LDG and distribution utility supply (option i).
- b) Confirmed.
- c) Variable option is expected to be preferred by those customers with stable and predictable annual peak loads but a considerable variability in monthly peak loads. For example, a customer may have a consistent summer peak year to year, but substantially lower demands for power during winter time. In this case, if the customer chose the Fixed option, they would be paying for capacity that they do not need over the winter months, and hence, the variable option is expected to be more attractive to them.

Fixed option would be preferred by those customers with stable and predictable annual peaks who also have uniformity in demand month over month and who wish to save the costs or may physically lack the room to install a meter on the generation output.

**2-Staff-95**

**COVID Impacts**

**Ref 1: 2-Staff-8 COVID Impacts – System Renewal**

**Question:**

Waterloo North Hydro stated a portion of a 2019 underground line renewal project was completed in 2020 resulting in an additional \$380,000 in capital expense in 2020.

- a) Please explain how this \$380,000 capital expense was not considered in the original application. If this was due to the project cost being higher than forecasted please provide details of the project to explain the variance.

Waterloo North Hydro stated that it deferred \$600,000 of underground work from 2020 to 2021. However, the 2021 system renewal budget has increased by \$851,540.

- b) Please explain the \$251,540 variance in the system renewal budget.

Waterloo North Hydro stated that it experienced higher than budgeted equipment damage and failures. The cost was \$496,300 higher than the budgeted \$304,486. This amount was higher than any historical year Waterloo North Hydro has experienced.

- c) Please explain the causes for the equipment damage and failures that has caused the budgeted amount to double. With each cause, please comment if it was related to COVID.
- d) Please comment if Waterloo North Hydro expects the costs of these failures to continue in the future years.

**Response:**

- a) During construction, excavations revealed more secondary cables to be in poor condition than had been initially anticipated. The additional work to replace the cables slowed the pace of construction resulting in final stages of the project being completed in 2020. The overall budget for this portion of the underground line renewal project was \$1,404,610 and final costs were approximately 14% over budget.

As explained in WNH's response to 2-Staff-8, due to unprecedented amount of uncertainty triggered by COVID, rather than updating select portions of the

application, WNH chose to file the already prepared evidence with the intent to update the entire capital program during the interrogatory phase of the rate application process.

- b) As explained in WNH's response to 2-Staff-8, WNH updated its capital plan to reflect all known changes since the application, including a number of changes below materiality in 2021 capital expense. They are:

<b>System Renewal</b>	
Overhead Line Renewal (8kV)	94,457
Proactive Renewal	80,000
Station Equipment Renewal	96,572
Miscellaneous/Other	(19,489)
<b>Sub-Total</b>	<b>251,540</b>

- c) Approximately \$253,000 of the extra costs in 2020 is due to a hardware failure at a highway crossing close to a transformer station near the start of the feeder which triggered a full replacement of the assets. The approvals, requirements to shut down the highway, police escort, and construction methods required for this crossing contributed to much higher than typical repair costs. This event was not related to COVID.

The remainder of the expense in this project category consist of a number of events associated with failures of assets, storms, cable dig-ins and motor vehicle collision damage to WNH plant. All items are well below materiality, most typically in the \$10,000-\$20,000 range, and not believed to be associated with COVID.

- d) The circumstances surrounding the hardware failure at the highway crossing described above is not typical of the type of failures WNH experiences on an annual basis.

Asset failures due to storms, cable dig-ins and motor vehicle collisions occur on an annual basis.

WNH applies learnings from unexpected asset failures and adjusts Proactive Renewal programs as necessary.

## **2-Staff-96**

### **Qualifying Generation Facilities**

**Ref 1: 2-Staff-10 – Qualifying Generation Facilities**

**Ref 2: Appendix 2-AA Capital Projects**

#### **Question:**

Waterloo North Hydro stated that it continues to receive monthly payments from the IESO for Ratepayer Protection under O. Reg. 330/09, offsetting the cost of the qualifying projects in rate base.

- a) Please confirm that Waterloo North Hydro understands that these monthly payments will stop at the end of 2020 and the remaining amounts of the single qualifying project would be recovered through rate base.
  
- b) Please confirm what projects are included in reference 2 in the line item “Renewable Generation Facility Assets and Other Non-Rate-Regulated Utility Assets”

#### **Response:**

- a) Confirmed.

- b) The line “Renewable Generation Facility Assets and Other Non-Rate Regulated Utility Assets” consists entirely of General Plant – MS/DS Decommissioning costs. WNH has included them in this line to clarify that the decommissioning costs are not included in rate base.

**2-Staff-97**

**Subdivision Expansions**

**Ref 1: 2-Staff-21 – Subdivision Expansions**

**Ref 2: 2-Staff-8 – COVID Impacts**

**Question:**

Waterloo North Hydro stated in reference 2 that a subdivision developer advanced their project from 2023 to 2020. This caused the 2020 system access budget to increase. In reference 1, Waterloo North Hydro stated that it anticipates higher level of activity in 2021 compared to 2019 and 2020 due to a commercial subdivision scheduled to come online.

- a) Please confirm if the subdivision developer had sub-phases that would affect the subdivision expansion budget for 2021. If so, please update the capital budget or explain why it is reasonable not to.

**Response:**

No, the commercial subdivision in this project category was initially planned to be fully constructed in 2021 and not broken into sub-phases. However, since the Application was filed, the developer has changed the nature and scope of the project. The developer’s new plans include constructing an overhead line expansion with subsequent developments to be connected in the future as they occur.

This change was reflected in the updates that WNH provided as part of the response to 2-Staff-8. The capital expenditures for Subdivision Expansions has been reduced to \$879,910 and the cost to construct the overhead line has been updated and moved to the Expansions (Lines) project category.

**2-Staff-98**

**Fleet – Trucks**

**Ref 1: 2-Staff-27 – Fleet – Trucks**

**Question:**

Waterloo North Hydro provided a list of all vehicles purchased in each year. For 2020, Waterloo North Hydro only purchased a work van but the 2020 budget was \$666,740.

- a) Please confirm what other vehicles were purchased or planned to be purchased in 2020.

**Response:**

Vehicle Type	Purchase Year	Description	Budget
Medium	2020	O21 Work Van	\$ 350,000
Small	2020	Line Supervisor Truck	\$ 70,000
Small	2020	Van	\$ 42,500
Small	2020	Van	\$ 42,500
Small	2020	Van	\$ 42,500
Small	2020	Van	\$ 42,500
Rolling Stock	2020	Trailer	\$ 60,000

Please note that only the Work Van exceeds materiality threshold.

**3-Staff-99**

**Load Forecast**

**Ref 1: 3-Staff-33**

**Question:**

In response to Staff's questions, Waterloo North Hydro states:

WNH has been closely following EB-2020-0133 Consultation on the Deferral Account – Impacts Arising from the COVID-19 Emergency. As time has passed, WNH has grown more confident that EB-2020-0133 and the corresponding sub-account will be sufficient in recovering any lost revenues due to COVID-19 from the Load Forecast presented in this Application. Therefore, WNH requests that WNH use the generic Lost Revenues Arising from the COVID-19 Emergency for Electricity and Gas Distributors in place of the WNH-specific sub-account requested in Exhibit 3 p.17.

- a) Please clarify how Waterloo North Hydro intends to use the generic 1509 account, as it states that the generic account 1509 will be used in lieu of the utility-specific sub-account which was originally intended to true up the load forecast to actuals.

**Response:**

WNH will utilize the generic account 1509 including each of the sub-accounts according to the accounting guidance issued by the OEB when it becomes available.

**4-Staff-100**

**Intervenor Costs**

**Ref 1: 4-Staff-51 – Regulatory**

**Question:**

Waterloo North Hydro stated that it increased intervenor costs by \$50,000 in anticipation that there are six total intervenors that would request cost claims. However, Hydro One stated in its intervention letter that it doesn't not intend to seek cost claims.

a) Please confirm if Waterloo North Hydro took this into account.

**Response:**

WNH did not take this into account in error. WNH has adjusted the additional \$50,000 to \$25,000 in the corresponding models that have been included as part of the pre-settlement questions.

**4-Staff-101**

**Purchasing and Fleet**

**Ref 1: 4-Staff-48 - Purchasing and Fleet**

**Question:**

Waterloo North Hydro explained that the increase in 2017 was due to obsolete inventory, a temporary contractor, invoice error, and unforeseen equipment repair. All these cost variances appear to be a one-time cost increase but past 2017, the Purchasing and Fleet budget does not revert to pre 2017 levels.

a) Please explain the maintained level of purchasing and fleet budget past 2017.

**Response:**

The maintained levels of the Purchasing and Fleet program past 2017 are explained as follows:

- In 2018, WNH increased the truck rates for small vehicle, medium trucks, and large trucks. These rates are consistent through to 2021.

- Facilities operating costs increased for stores, warehouse, and vehicle garage due to various reasons such as the CDM Key Account building reallocation is no longer being funded by the IESO, therefore the distribution of these costs increased the overall OM&A cost for WNH, shortage of salt for snow removal increased the cost in 2019, and increase in waste removal increased the facilities operating costs which is then burdened out to the respective departments based on the square feet of the service centre.
- In preparation for succession planning to replace Fleet Technician who plans to retire in 2023, an additional FTE was budgeted to be hired in 2020.

#### **4-Staff-102**

##### **Executive Compensation**

##### **Ref 1: Attachment 24 – Executive Total Compensation Policy**

##### **Question:**

Waterloo North Hydro's Executive Incentive Opportunity allows executives to earn 150% of their target bonus for outstanding achievement. One of the objectives for the incentive pay is also profitability.

- a) Please explain how profitability is measured and comment on how executives improve profitability.
- b) Please explain how an executive achieves outstanding profitability.
- c) When was the last time Waterloo North Hydro compared their executive compensation to the market? What percentile position is Waterloo North Hydro as compared to public and private sectors?

**Response:**

- a) Profitability is not the sole objective - the objective is financial performance. Please see response to SEC 67 for further details.
  
- b) Given increasing costs of operations and changes in government and regulatory policies, a constant annual productivity factor, and maintaining service levels, achieving an ROE that is at the OEB prescribed level would be considered as outstanding profitability. Please see response to SEC 67 for further details.
  
- c) Executive compensation was last compared to the market in 2018. At that time WNH compensation was slightly below the average of the broader public /industrial sectors and inline and slightly below comparable LDCs. WNH aims to be at the 50th percentile level.

**4-Staff-103**

**Information Technology (IT)**

**Ref 1: 4-Staff-52 - Information Technology**

**Ref 2: 1-SEC-13**

**Question:**

Waterloo North Hydro stated that new software system such as the Customer Information System has reduced manual efforts taken to deal with large amounts of data leading to productivity gains in billing & customer service and collection. However, the billing and the administration and finance OM&A costs have increased since the last rebasing.

- a) Please provide quantitative productivity gains as a result of the new software systems.

- b) Please show the OM&A for billing and administration and finance without these productivity gains.
- c) Please provide year-over-year variance analysis for the billing and the administration and finance budget.
- d) If Waterloo North Hydro is unable to provide OM&A efficiency gains from the software systems, which require higher IT OM&A, then please explain how Waterloo North Hydro justifies the software systems and IT costs.

**Response:**

- a) The tasks previously done with manual work that have either been reduced in complexity or automated entirely with the implementation of JOMAR were EBT, MDM/R synchronization and bill presentation. These changes allowed WNH to eliminate a Programmer Analyst – CIS position. In addition, WNH's previous provider's (Daffron) costs would have been higher for three main reasons:
  - 1) Daffron's cost for development and maintenance is higher than JOMAR's and is in USD as well
  - 2) Daffron's software requires an expensive platform (IBM's OS400)
  - 3) Like JOMAR Daffron required in-house programming staff. However, unlike JOMAR Daffron was written in RPG, a programming language both difficult and expensive to find knowledgeable staff.
- b) It is very difficult to quantify the productivity gains because WNH does not prepare a hypothetical OM&A budget for positions and costs that have not occurred.

c) Billing

Programs	2016 Board Approved	2016 Actual	2017 Actual	2018 Actual	2019 Actual	2020 Bridge	2021 Test
<b>Reporting Basis</b>	<b>MIFRS</b>	<b>MIFRS</b>	<b>MIFRS</b>	<b>MIFRS</b>	<b>MIFRS</b>	<b>MIFRS</b>	<b>MIFRS</b>
Labour and Employee Costs	490,212	581,966	568,896	574,158	646,392	509,329	620,309
Training, Professional Memberships, Conference, Travel	25,521	23,994	26,266	25,466	25,160	25,458	29,517
Building Allocation	15,232	15,866	14,734	14,927	16,847	14,752	16,842
Office Expenses, Truck Costs	13,390	20,480	19,566	16,705	10,021	12,360	17,543
MDMR Costs and Meter Reading	287,336	357,193	287,918	305,894	301,873	311,000	350,400
Meter Data Management	80,000	71,077	136,385	140,130	143,020	144,500	145,500
Billing Costs - Postage, Digital Services, Bill Fold, Envelopes and Bills	320,200	298,495	467,443	523,523	514,833	522,300	528,300
<b>Total</b>	<b>1,231,891</b>	<b>1,369,071</b>	<b>1,521,208</b>	<b>1,600,803</b>	<b>1,658,146</b>	<b>1,539,699</b>	<b>1,708,411</b>

Administration and Finance

Programs	2016 Board Approved	2016 Actual	2017 Actual	2018 Actual	2019 Actual	2020 Bridge	2021 Test
<b>Reporting Basis</b>	<b>MIFRS</b>	<b>MIFRS</b>	<b>MIFRS</b>	<b>MIFRS</b>	<b>MIFRS</b>	<b>MIFRS</b>	<b>MIFRS</b>
Labour and Employee Costs	935,048	1,037,519	1,327,537	1,272,577	1,186,998	1,112,676	1,208,137
Training Professional Memberships, Conference, Travel	61,721	70,606	69,851	72,742	120,089	114,435	102,535
Board of Directors	77,615	81,235	100,337	91,392	103,997	91,030	101,935
Building Allocation	39,045	46,844	48,230	46,836	52,858	49,129	49,706
Recruitment, Office Expenses, Subscription, Corporate Membership	146,337	155,810	165,258	169,007	180,003	203,311	215,477
Corporate Expense, Audit, Legal	162,684	307,696	219,652	212,694	189,970	176,040	198,167
<b>Total</b>	<b>1,422,450</b>	<b>1,699,710</b>	<b>1,930,865</b>	<b>1,865,248</b>	<b>1,833,915</b>	<b>1,746,621</b>	<b>1,875,957</b>

d) The increases in Billing are not due to the new system and instead are mainly due to monthly billing. As noted in the previous Application, WNH increased staffing by one Billing and Settlement Coordinator to help manage the increase in bills. There were also significant changes, which can be labour intensive, that occurred since the CIS implementation including:

- Ontario Fair Hydro Plan
- Ontario Rebate for Electricity Consumers Act
- Ontario Electricity Support Program
- Bill Redesign

- Ontario Electricity Rebate
- Changes to Customer Service Rules

Many of these changes were developed with the vendor and tested by internal staff. If WNH had stayed with the original vendor these costs would be higher and would take substantially longer to implement.

In addition, one of the main reasons for moving to a new CIS was due to the vendor shifting away from the Ontario LDC Market. This vendor only has a couple of remaining LDC customers. WNH saw this as a large risk especially with the increasing regulatory changes. WNH is unsure if the vendor could manage the recent changes to customer service rules.

#### **4-Staff-104**

##### **Low Voltage Charge**

##### **Ref 1: 8-Staff-75 – Low Voltage**

##### **Question:**

In allocating the Low Voltage charges, Waterloo North Hydro used \$1.0378 for the retail transmission connection rates for GS>50kW.

- a) Please explain how Waterloo North Hydro calculated this number.

##### **Response:**

WNH used the 2018 billed kW and weighted average 2021 RTSR – Connection Rate as per the RTSR Workform.

However, WNH has updated the billed kW to use the 2019 billed kW instead of the 2018 billed kW to be consistent with the RTSR Workform that uses the 2019 data. This

reflection changes the weighted average for GS > 50 kW from \$1.0378 kW to \$1.0258 per kW as the billed kW were lower in 2019 compared to 2018. This is reflected in the models.

Rate Class	Retail Transmission Connection Rates		Billing Determinants		Allocation of Low Voltage Charges			Billing Determinants	
	Per kWh	Per kW	Annualized kWh or kW	Unit of Measure	Retail Tx Connection Revenue - Basis for Allocation (\$)	Allocation Percentages	Allocated \$	Low Voltage Rates / kWh	Low Voltage Rates / kW
Residential	\$ 0.0025		398,063,895	kWh	995,160	28.7%	128,221	0.0003	
GS < 50 kW	\$ 0.0023		197,062,409	kWh	453,244	13.1%	58,398	0.0003	
GS > 50 kW		\$ 1.0258	1,773,376	kW	1,819,192	52.4%	234,395		0.1322
Large User		\$ 1.1055	170,575	kW	188,571	5.4%	24,296		0.1424
Unmetered Scattered Load	\$ 0.0023		2,947,114	kWh	6,778	0.2%	873	0.0003	
Street Lighting		\$ 0.6817	9,302	kW	6,341	0.2%	817		0.0878
Embedded Distributor		\$ -	103,033	kW	-	0.0%	-		-
<b>Total</b>					<b>3,469,286</b>	<b>100.0%</b>	<b>447,000</b>		

#### 4-Staff-105

#### PILs Expense

Ref: the Updated PILs Model; 2019 Tax Return; 2019 Audited Financial Statements (AFSs)

#### Question:

Staff notes from the updated PILs model that Waterloo North Hydro has included an amount of \$493,491 for Tax recovery incl. in net movements in reg. balance on P&L in line 395 of Tab B1 Sch 1 Taxable Income Bridge.

Staff notes that this line item was also in the actual tax returns of 2018 and 2019. Staff has summarized this line item as below:

	<b>2018 actual</b>	<b>2019 actual</b>	<b>2020 updated</b>
<b>Tax recovery incl. in net movements in reg. balance on P&amp;L</b>	\$1,615,359	\$2,144,441	\$493,491

Note 8 Regulatory Deferral Account Balance of the 2019 AFSs states that:

Net movement in regulatory deferred account balances net of taxes of \$3,328,624 consists of the regulatory deferred tax expense of \$2,144,441, the regulatory treatment on the Accelerated Investment Incentive tax program of (\$493,491) and the difference between the Power Purchased and the Sale of Electricity of \$1,677,674.

Staff notes that the newly added figure of \$493,291 in the schedule 1 bridge year of the updated PILs model matches to one of the numbers stated in the above Note 8 of the 2019 AFSs regarding the regulatory treatment on the Accelerated Investment Incentive tax program.

- a) Please explain the nature of the \$493,491 line item in 2020 schedule 1 and why the figure is equal to the item in Note 8 of the 2019 AFSs regarding the regulatory treatment on the Accelerated Investment Incentive tax program.
- b) Please provide the implication of the inclusion of this line item in the 2020 schedule 1 on the 2021 forecasted PILs expense.

**Response:**

- a) Per WNH’s response to 9-Staff-87, WNH expects the treatment and magnitude of the 2020 Accelerated Investment Incentive Program (AIIP) to be the same as the 2019 adjustment (\$493,491).

b) Similar to the 2019 tax treatment, the AIP regulatory adjustment has been included in the 2020 Income before PILs/Taxes and then subsequently deducted in line 395 of Tab B1 Sch 1 Taxable Income Bridge of the revised PILs workform. This ensures that the regulatory adjustment for AIP is excluded from the PILs calculation.

**4-Staff-106**

**PILs Expense**

**Ref: IR Response to 4-Staff-61**

**Question:**

In responding to part b) of the question, Waterloo North Hydro states that “WNH plans on utilizing Account 1592 for the duration of the rate-setting term and therefore did not propose a smoothing mechanism in this Application.”

In responding to part c) of the question, Waterloo North Hydro provided the following calculation for the PILs impact under a scenario without smoothing as compared to one with smoothing:

Rate-Setting Year	2021	2022	2023	2024	2025	Total
Applicable AIP factor	1.5x	1.5x	1.5x	1.0x	1.0x	
CCA without AIP	\$ 14,015,357	\$ 14,015,357	\$ 14,015,357	\$ 14,015,357	\$ 14,015,357	\$ 70,076,787
CCA with AIP	15,997,317	15,997,317	15,997,317	15,167,971	15,167,971	78,327,893
CCA Difference	1,981,960	1,981,960	1,981,960	1,152,613	1,152,613	8,251,106
CCA Difference - Smoothed	1,650,221	1,650,221	1,650,221	1,650,221	1,650,221	8,251,106
CCA with AIP - Smoothed	\$ 15,665,579	\$ 15,665,579	\$ 15,665,579	\$ 15,665,579	\$ 15,665,579	\$ 78,327,893
CCA effect - 2021 Test Year	-\$ 331,739					
PILs effect - 2021 Test Year	-\$ 87,911					
PILs effect - 2021 Test Year - Grossed Up	-\$ 119,606					

Staff notes that the 2021 test year capital addition was used as a single year basis in the calculation without the consideration of the CCA on the prior years’ undepreciated capital costs (for example, the 2022 CCA would be based on the opening UCC of the year plus the CCA additions in 2022).

- a) Based on the current proposed capital additions in 2021, what would be the balance in Account 1592 in the next rebasing application (assuming the five year cycle is followed) if the smoothing is not applied?

**Response:**

Under the non-smoothing approach, AIIP would be fully included in revenue requirement at the 1.5x rate as indicated in the revised PILs Workform submitted as part of WNH's response to 1-Staff-1. As a result, in years where the AIIP has a different factor (namely 2024 & 2025 at 1.0x in the typical five-year cycle), an AIIP regulatory adjustment to Account 1592 would be required. This adjustment would be equal to the grossed up PILs effect related to the difference in CCA with AIIP at 1.5x vs. 1.0x. Per the referenced table, this would be equal to a CCA effect of \$829,346 each year and a grossed-up PILs effect of \$299,016. Thus, the total balance at the end of 2026 would be \$598,032.

**5-Staff-107**

**Cost of Capital**

**Ref 1: 5-Staff-62 – Long-term Debt**

**Question:**

Please explain how Waterloo North Hydro ensures that the interest rate received for the bank debt is the lowest rate possible.

**Response:**

When planning future borrowings, WNH consistently monitors cash flow requirements and Bank of Canada interest rates and forecasts. WNH then uses this information to time borrowings in an attempt to secure financing at the lowest rate possible. Over several years WNH has built a strong relationship with CIBC and receives preferential

rates due to the consistency of borrowings. When it comes time to borrow additional funds, WNH will request a quote from CIBC and compare this quote to posted rates from other institutions. If the rate offered by CIBC is competitive, WNH will accept. If not, WNH will seek other financing options.

**9-Staff-108**

**Account 1508**

**Ref: IR Response to 9-Staff-86**

**Question:**

Waterloo North Hydro provided the breakdown of the \$700k net gain for the disposition of the MS3 station in 2016. Staff notes that the net gain is comprised of \$1 million net of the \$300k costs. Included in the \$300k costs, there is a disposal cost of \$285,516.

- a) Please explain the nature of the disposal cost of \$285,516.

**Response:**

Please refer to WNH's response to 2-Staff-30 for a listing of typical costs required to dispose of a municipal substation. The costs in this response are based off previous disposals which include MS3. Costs differ based on the size and extent of environmental remediation required at each site.

**9-Staff-109**

**Account 1592 Sub-account CCA Changes**

**Ref: IR Response to 9-Staff-87; the DVA continuity schedule**

**Question:**

Waterloo North Hydro states that

WNH confirms that the amount should be grossed-up. Please refer to the table below for a calculation of the 2019 and 2020 grossed up amounts of \$671,416. Per response to part b), the 2019 and 2020 amounts will be equal since both are calculated based on 2016 approved capital additions in the last Cost of Service Application (EB-2015-0108). WNH has updated the DVA Continuity Schedule for the revised amounts.

Waterloo North Hydro has provided the calculation of the 2019 balance using the approved Capital additions and actual capital additions. Staff notes that the UCC opening balances used in the tables for the calculation of the balances in Account 1592 is different.

- a) Please explain why the two calculations have different opening UCC balances?
- b) Please explain whether the UCC would impact the balance in Account 1592 for the CCA changes if the account is to include more than one year's balances? Please provide rationale for the position.
- c) Please provide the 2020 balance as recalculated by using the 2019 UCC-ending balance as 2020 UCC-opening balance and compare this recalculated balance to the original amount.

**Response:**

- a) The two calculations have different opening UCC balances since they relate to different years; 2016 and 2019. In the "Adjustments due to AIIP" tables on the right-hand side, CCA on opening UCC is calculated separately from CCA on Additions. This is done to better compare total CCA with AIIP (column "Revised CCA" in right table) vs. CCA without AIIP (column "CCA" in left table) which is

calculated on both opening UCC and net additions. In this calculation methodology UCC does not impact the difference in CCA.

b) Per WNH's response to 9-Staff-87 b), it is WNH's understanding that 1592 is intended to capture the impact of any differences that are not reflected in rates. Considering the typical rate-setting cycle, only the test year has an effect on PILs included in rates. Only test year additions will be affected by AIIP and each subsequent non-test year will have the same AIIP adjustment calculation. Therefore, UCC would not impact the balance in Account 1592.

c) Please see the table below which compares 2020 CCA with and without AIIP adjustments. The table on the left side calculates CCA without AIIP using 2019 closing UCC without AIIP per the table provided in response to 9-Staff-87. The table on the right side calculates CCA with AIIP using 2019 closing UCC with AIIP per the table provided in response to 9-Staff-87. The total CCA difference is compared to the 2016 Test Year AIIP difference.

Schedule 8 CCA - 2020 Revised UCC

Class	Class Description	UCC Opening Balance (w/without AIIP)	Additions	Disposals (Negative)	2020 Projected without AIIP			CCA	UCC End of Year	Adjustments due to AIIP				
					UCC Before 1/2 Yr Adjustment	1/2 Year Rate (1/2 Additions Less Disposals)	Reduced UCC			Rate %	CCA on Opening UCC (with AIIP)	AIIP Additions	Revised CCA	UCC End of Year
1	Distribution System - post 1987	\$ 49,174,806			\$ 49,174,806	\$ -	\$ 49,174,806	4%	\$ 1,966,992	\$ 47,207,814	1,966,992.23	-	1,966,992	47,207,814
1 Enhanced	Non-residential Buildings Reg. 1100(1)(a.1) election	\$ 16,321,606			\$ 16,321,606	\$ -	\$ 16,321,606	6%	\$ 979,296	\$ 15,342,310	979,076	-	979,076	15,342,310
8	General Office/Store Equip	\$ 5,994,922	305,968		\$ 6,300,890	\$ 159,983	\$ 6,140,907	20%	\$ 1,229,581	\$ 5,071,327	1,111,225	91,750	1,203,015	5,097,874
10	Computer Hardware/ Vehicles	\$ 1,793,592	301,802		\$ 2,095,394	\$ 290,941	\$ 1,804,453	30%	\$ 513,380	\$ 1,692,114	473,482	225,847	699,278	1,596,195
12	Computer Software	\$ 61,280	1,755,912		\$ 1,817,192	\$ 877,968	\$ 939,226	100%	\$ 939,226	\$ 877,968	-	1,755,912	1,755,912	81,280
45	Computers & Systems Hardware acq'd post Mar 22/04	\$ 2			\$ 2	\$ -	\$ 2	45%	\$ 1	\$ 1	1	-	1	1
46	Data network infrastructure equip and systems acq'd	\$ 110,195			\$ 110,195	\$ -	\$ 110,195	30%	\$ 33,058	\$ 77,136	22,849	-	22,849	87,346
47	Distribution System - post February 2005	\$ 105,879,258	14,360,140		\$ 119,433,400	\$ 7,180,071	\$ 112,253,329	8%	\$ 8,980,286	\$ 110,453,134	8,523,487	1,725,217	10,046,704	109,366,696
50	Data network infrastructure equipment - post Mar 2005	\$ 626,023	308,030		\$ 934,053	\$ 166,027	\$ 768,026	55%	\$ 426,728	\$ 507,328	275,694	277,244	552,938	409,141
95	CWP	\$ 3,658,585	-1,042,649		\$ 2,615,936	\$ -	\$ 2,615,936	0%	\$ -	\$ 2,615,936	-	-	-	2,615,936
TOTAL		\$ 182,854,270	\$ 16,217,306	\$ -	\$ 199,071,576	\$ 8,629,978	\$ 190,441,599		\$ 15,178,519	\$ 183,893,057	13,152,759	4,074,009	17,226,765	181,844,812

Difference in CCA due to AIIP	2,048,246
Tax rate	26.50%
Distribution Revenue Effect	542,785
Revenue Effect Grossed Up	738,483
<b>Difference 2020 vs. 2016 Test Year</b>	
Difference in CCA due to AIIP	186,016
Tax rate	0.00%
Distribution Revenue Effect	49,294
Revenue Effect Grossed Up	67,067

**9-Staff-110**

**DVA Continuity Schedule**

**Ref: IR Response to 9-Staff-88**

**Question:**

Staff noted two missing figures for Total Consumption less WMP Consumption on Tab 6.1a and Tab 6.2a of the DVA continuity schedule. Based on the review of the updated DVA continuity schedule, OEB Staff notes that only Tab 6.2a was updated but Tab 6.1a was not.

- a) Please update the Tab 6.1a by including a figure for the cell of Total Consumption less WMP consumption.

**Response:**

The DVA Continuity Schedule has been updated in Tab 6.1a to include the Non-RPP Consumption Less WMP Consumption in cell D19.

**9-Staff-111**

**Account 1589**

**Ref: IR Response to 9-Staff-89; Attachment 10a Support Power Liability**

**Explanation**

**Question:**

In explaining why there are no line loss differences in the 2017 and 2018 GA Analysis Workforms, Waterloo North Hydro states that

WNH submitted unaccounted for energy due to volume differences for 2017 and 2018 as part of the 1588 correction true-up submitted in 2019. This true-up was outside of the IRM application process.

Staff notes from the GA reconciliation process described in the Attachment 10a that Waterloo North Hydro accrues the GA charges as at year-end using the Non-RPP billed consumptions from the CIS and multiplied by the final GA rates in the respective months.

- a) Please confirm the above staff observation. If confirmed, please further confirm whether account 1588 only records the price differences for Global Adjustment related to non-RPP customers.
- b) Given that the unaccounted for energy volume differences impacts both Account 1589 and Account 1588, please explain why the differences for the GA that resides within Account 1589 is included as part of the 1588 true-up submitted in 2019?
- c) Please provide a similar calculation as provided in part b) of the response for 2017 and 2018 as well.

**Response:**

WNH understands that to properly answer the above interrogatory and the two subsequent interrogatories (9-Staff-112 & 9-Staff-113), a recalculation of Account 1588 and Account 1589 is required. WNH has performed this calculation as directed in 9-Staff-113 for the years 2015 to 2018.

WNH has provided live Excel model Att 10b Support – Power Liability Explanation – revised v2 which contains the 1588 & 1589 recalculations on the UFE Analysis tab. The following disclaimers are necessary:

- This is a base calculation that will be used to answer the above interrogatories. It is by no means a complete answer.
- WNH's request specifically relates to a confirmation of methodology, not a formal response to the above interrogatories.
- WNH does not have the ability to provide underlying data as requested by the OEB. In this response, WNH is attempting to provide estimates using the best data available. Furthermore, WNH is requesting the OEB Staff to confirm the estimating approach before undertaking any additional data integrity checks.

**9-Staff-112**

**Account 1588**

**Ref: Attachment 10a Support Power Liability Explanation**

**Question:**

Waterloo North Hydro states that

After the GA Reconciliation Accrual to 4705 that is offset to 2205, 1588 calculates properly and there is no immediate effect. 1589 also calculates properly and there is no effect.

Due to the GA Reconciliation Accrual which increases (debits) 4705 and increases (credits) 2205, the effect of the error on the calculation of 1588 is delayed into the next period. The credit balance in 2205 represents an amount owing to customers.

Waterloo North Hydro confirmed that the GA reconciliation process is not in conformity with the new accounting guidance in recording the variances in accounts 1588 and 1589.

Staff notes from the new accounting guidance and the Accounting Procedures Handbook that any RPP settlement adjustments are included in the CT 1142 of the IESO invoice, recorded in Account 4705 and then reflected in Account 1588 when the cost of power expense in Account 4705 (including the RPP settlement adjustments) is compared to the energy revenues. This process has not been changed from the Accounting Procedures Handbook.

- a) Please confirm that Waterloo North Hydro owes the RPP customers \$2.6 million due to the over-claim of the RPP portion of Global Adjustment in 2015 and 2016.
- b) Please explain whether Waterloo North Hydro has an excess of \$2.6 million or \$5.2 million currently held in its accounts to be returned/refunded.
- c) Please confirm that under the Accounting Procedures Handbook, Account 4705 should be compared to the energy revenue accounts and the variance of the two accounts should be booked in Account 1588.
- d) Please confirm that the journal entry after the 4705 is to debit Account 1588 and credit 4705 in order to reflect the variance in the cost of power variance account.

**Response:**

Please refer to WNH's response to 9-Staff-111.

**9-Staff-113**

**Account 1588**

**Ref: Waterloo North Hydro's 2017 IRM Decision and Order and 2018 IRM Decision and Order; Appendix 2-R Loss Factors in the current rate application**

**Question:**

Waterloo North Hydro's 2015 and 2016 balances for Account 1588 were disposed in the 2017 and 2018 IRM Decisions and Orders respectively. Staff summarized the disposed balances in Account 1588 as below:

	<b>2015 Principal</b>	<b>2015 Interest</b>	<b>Total Disposed Balance - 2015</b>
<b>Account 1588</b>	(1,145,965)	(21,524)	(1,167,489)
	<b>2016 Principal</b>	<b>2016 Interest</b>	<b>Total Disposed Balance- 2016</b>
<b>Account 1588</b>	770,633	18,109	788,742

- a) Please prepare the following tables to calculate the unaccounted-for energy variances that should have been recorded in Account 1588 and compare to the principal balances in 2015 and 2016:

	<b>2015 Wholesale kWh</b>	<b>2015 Retail kWh</b>	<b>Volume Difference (kWh)</b>	<b>2015 Weighted Average Price (Note 1)</b>	<b>Unaccounted for Energy Loss \$</b>
RPP					
Non-RPP (Note 2)					

				<b>Total Unaccounted for Energy Loss \$</b>	
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Note 1: the weighted average price = the energy revenues of the year divided by the retail consumption of the year

Note 2: Non-RPP consumption needs to exclude the consumptions for Class A customers.

Please prepare this table for 2016 as well.

- b) Please explain the variances noted in 2015 and 2016 respectively between the calculated total unaccounted-for energy losses and the disposed principal balances in 2015 and 2016.

**Response:**

Please refer to WNH's response to 9-Staff-111.

## **SEC Pre-Settlement Questions**

### **Question:**

39. [Ex. 1-STAFF-2] Did the Applicant receive any letters of comment or complaint with respect to the Application that were not posted on the Board's website? If so, please provide copies.

### **Response:**

As per the Letter of Direction from the OEB on July 20, 2020, WNH e-mailed customers the Notice of Hearing. WNH provided contact details at the bottom of the e-mail stating, "To contact us, please call our Regulatory Affairs team at 519-886-5090 weekdays between 8:30 am and 4:30 pm or reach us by email at regulatory@wnhydro.com."

WNH received 34 comments from customers and all of the comments were responded to. WNH responded to each specific question that customers may have had and provided a generic e-mail for the customers that had general comments. Please see the attached document for the e-mails received from customers and WNH's responses.

### **Question:**

40. [Ex. 1-STAFF-3(d)] Please provide the net impact of the deferral on 2021 revenue requirement, including half year rule, tax impacts and accelerated depreciation, and provide the supporting calculations.

### **Response:**

The Enterprise Resource Planning System (ERPS) was initially budgeted with equal capital expenditures (CAPEX) between 2021 and 2022 with an implementation date in 2022. As a result, the related 2021 CAPEX would appear in Construction Work in

Progress (CWIP) as of December 31, 2021 and would have no impact on average net fixed assets included in rate base. Moreover, since the asset would not have been in service as of December 31, 2021, there would be no depreciation calculated for the 2021 fiscal period. Therefore, the deferral of the CAPEX related to the ERPS from 2021 & 2022 to 2022 & 2023 has no impact on the 2021 revenue requirement.

**Question:**

41. [Ex. 1-STAFF-5(a)] Please confirm that the five worst-performing feeders are all in lower density areas of the service territory. Please discuss the extent to which their rural nature is affecting their performance, and what steps the Applicant can take to alleviate this problem going forward.

**Response:**

Waterloo North Hydro's Inc. worst performing feeders are not specifically confined to lower density areas. Please refer to Table SEC-41(a) which illustrates that with regards to the worst performing feeders, 91% of customers and 44% of the feeder lengths are in urban areas.

Ranking	Station	Worst Performing Feeder	2019 Customer Count	Customer Count Urban	Customer Count Rural	2019 Feeder Length (km)	Feeder Length Urban (km)	Feeder Length Rural (km)	Customers/ km
1	HSTS_B	HS22	2,393	2,393	0	35	35	0	68
2	TS3	3F68	3,200	2,416	784	95	26	69	34
3	HSTS_B	HS20	1,922	1,922	0	14	14	0	140
4	ERTS	ER44	3,116	3,116	0	54	54	0	58
5	TS3	3F61	1,585	1,255	330	122	10	111	13
	Total		12,216	11,102	1,114	319	139	180	38
				91%	9%		44%	56%	

For comparison purposes, WNH's average customer / km metric for its entire distribution system is 34.

Although rural feeders tend to be longer in length which provides for greater line exposure, urban feeders tend to have higher customer densities which can impact more

customers per event. All feeders have exposure to Adverse Weather, Foreign Interference and Tree Contacts which impact feeder reliability.

Annually, WNH reviews its year-end reliability data and formulates an action plan for its Worst Performing Feeders (WPF). These plans are incorporated in the budgeting and approval process for the following year. Please reference Exhibit 2 - Appendix K, WNH

Distribution System Reliability Report, page 509, Table 7-2: Worst Performing Feeder Action Plan (2019).

**Question:**

42. [Ex. 2-STAFF-8; updated RRWF, Tabs 4,6&14; updated PILs workform, Tab T1]

Please confirm that the updates to capital spending result in an \$899,527 (0.39%) reduction in Test Year rate base, a \$41,578 (0.31%) reduction in Test Year cost of capital, a \$52,021 (0.47%) reduction in Test Year depreciation, a \$116,752 reduction in Test Year taxable income, and a decrease in grossed-up PILs of \$42,094. Please confirm that the total impact on Test Year Base Revenue Requirement is a reduction of \$135,693 (0.35%), reducing the deficiency from \$2,624,364 (6.68%) to \$2,488,671 (6.33%).

**Response:**

WNH notes that the updates specifically related to capital spending from WNH's response to 2-Staff-8 are captured as change #2 of tab 14. Tracking Sheet of the updated Revenue Requirement Workform (RRWF) submitted as part of response to 1-Staff-1. These changes exclude the related PILs updates which were calculated after all changes resulting from interrogatory responses and included as change #5 of tab 14. Tracking Sheet of the updated RRWF submitted as part of response to 1-Staff-1.

WNH notes that the figures quoted above are based on all changes (#1 through #5 on tab 14. Tracking Sheet of the updated RRWF submitted as part of response to 1-Staff-1) and will confirm based on the revised RRWF as such:

- Per tab 4. Rate Base, Net Fixed Assets (average) included in rate base has decreased by \$899,527 (0.39%).
- Per tab 7. Cost of Capital, total Cost of Capital has decreased by \$41,578 (0.31%).
- Per tab 3. Data Input Sheet, Depreciation has decreased by \$52,051 (0.47%).
- Per tab 6. Taxes PILs, Taxable Income has decreased by \$207,485, not the \$116,752 quoted above.
- Per tab 6. Taxes PILs, Grossed-up PILs has decreased by \$107,199, not the \$42,094 quoted above.
- Per tab 9. Rev Reqt, Test Year Base Revenue Requirement has decreased by \$130,134, not the \$135,693 quoted above.
- Per tab 8. Rev Def Suff, Gross Revenue Deficiency has decreased from \$2,624,364 to \$2,417,050.
- All of the above changes are corroborated with interrogatory references on tab 14. Tracking Sheet.

**Question:**

43. [Ex. 2-STAFF-9 (a)] Please confirm that the additional \$644,000 of capitalized labour has been included in account 1576. Please provide a list of all other projects in the period 2016 to 2020 affected by that accounting change.

**Response:**

No additional amounts have been included in account 1576. Please refer to Exhibit 9 of WNH's 2016 Application (EB-2015-0108). The impact of the accounting change ended in 2015.

**Question:**

44. [Ex. 2-STAFF-21] Please reconcile the increase in Subdivisions Expansion investment with the expected load and customer growth for the affected rate classes.

**Response:**

As detailed in response to 2-Staff-97, during the interrogatory stage of this proceeding WNH updated the Subdivision Expansion project category cost due to the change in the nature and scope of the commercial project initially anticipated for 2021. The updated Subdivision Expansion capital expense for 2021 is \$879,910, which is the second lowest annual expenditure since 2016 and below the historical average of \$968,313.

OEB Investment Category	Year	Subdivision Expansion CapEx
Historical Period	2016	967,227
	2017	1,015,261
	2018	924,406
	2019	782,768
Bridge Year	2020	1,151,905
Test Year	2021	879,910

The decrease in 2021 capital expense is in line with expected load and customer growth for the residential rate class.

**Question:**

45. [Ex. 3-STAFF-32, 33] Please confirm that the Applicant is no longer seeking any order from the Board in this proceeding with respect to lost revenues due to Covid-19, and instead will rely on the Board's generic consultation on Covid-19 impacts.

**Response:**

Confirmed.

**Question:**

46. [Ex. 4-STAFF-40] Please explain why, faced with lost revenues due to Covid-19, the Applicant in 2020 has not moved to reduce operating costs to offset those losses.

**Response:**

As noted in Exhibit 1 of the Application, after Customer Engagement, WNH revisited its OM&A expenses and was able to cut \$242,393. These cuts will already impact service levels in 2021. Any further cuts to OM&A will significantly impact operations of the business including operations and maintenance and customer service. There are no cost decreases because of COVID-19. As an 'Essential Service' WNH is required to operate as it always has.

**Question:**

47. [Ex. 4-STAFF-49; 1-CCC-8] The new Key Accounts Department continues certain of the CDM-related activities that were previously funded by IESO, and had associated with them specific deliverables and accountabilities. Now that the Applicant is proposing that the ratepayers cover those costs, what are the specific deliverables and accountabilities against which the performance of the new Key Accounts

Department should be measured? For each of those deliverables and accountabilities, please tie them directly into a benefit for the ratepayers, and demonstrate that the proposed spending is a cost-effective way of achieving the target benefit.

**Response:**

Initiative / Deliverable	Rate Class Impacted	Value to Rate Class
<p><b>Energy Literacy - Assisting customers in understand their bill, their rates, how their home or business uses energy, how they can manage their energy usage</b></p>	<p>Residential, GS &lt;50 kW, GS&gt;50 kW, Large User</p>	<p>WNH has established itself as a reliable and trustworthy source of information for customers on electricity related matters including billing and rates, energy efficiency and energy management through the delivery of past CDM programs and ongoing education initiatives. Energy literacy information is tailored to the customer segment and delivered through a number of channels including bill inserts, on-bill messaging, quarterly emails, web content, social media posts (Twitter and Facebook) linked back to web content, and in person meetings. These delivery tactics have proven to be cost effective as WNH can include bill inserts and on bill messaging with bills, leverage the growing email contacts as well as the established social media followings.</p>

<p><b>Energy Coaching – Building internal teams, energy champions, monitoring energy usage, energy hunts, etc.</b></p>	<p>GS&gt;50 kW, Large User</p>	<p>WNH has developed relationships with general service and large user customers through the delivery of the CDM programs and has proven itself as a trusted advisor on electricity, energy efficiency and energy management matters. Energy coaching builds on these existing relationships, the in-depth knowledge of the customers, their facilities and processes, which allows for efficient and cost effective support.</p>
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<p><b>Facility and Equipment Assessments / Identifying Energy Efficiency and Management Projects</b></p>	<p>GS&gt;50 kW, Large User</p>	<p>WNH has identified through experience that customers require assistance in assessing their facilities and equipment and identifying energy efficiency and energy management projects as they lack the experience and time to do so. WNH has developed the knowledge and expertise to provide facility and equipment assessments and identify energy efficiency and management projects that would otherwise be an additional cost to customers. In addition, WNH is technology and vendor agnostic, thereby providing customer with unbiased guidance for energy efficiency and energy management improvements to their equipment and facility. Furthermore, WNH has identified a lack of resources and knowledge as a major barrier to customers implementing energy efficiency</p>
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projects and participating in energy efficiency programs.

**Metering and monitoring of equipment to understand usage, identify opportunities, provide ongoing monitoring of energy efficiency and energy management projects and programs**

GS>50 kW,  
Large User

Metering and monitoring of equipment is a key component in supporting the business case for energy efficiency and management projects and ensuring projects deliver the savings promised by technology providers. WNH owns the equipment necessary to assist customers and provides the equipment and the data analysis as a free service that otherwise would be a cost to customers.

**Assistance building the business case for energy efficiency and management projects**

GS>50 kW,  
Large User

Developing the business case is key component to moving energy efficiency and energy management projects into action and WNH can leverage its knowledge and experience to assist customers in business case development. And by being vendor and technology agnostic, WNH brings an unbiased approach to the process.

**Application support for incentives, grants and rebates**

GS>50 kW,  
Large User

WNH has extensive experience with energy efficiency incentive and grant programs. WNH has knowledge of the incentive program requirements, the process, and program requirements thereby ensuring

customers receive the maximum incentive and the process is completed and do so without charging customers fees thereby ensuring customers receive the entire incentive. In addition, WNH providing this service to customers is part of the energy efficiency project process and a natural extension.

**Project management**

GS>50 kW,  
Large Users

From WNH’s experience delivering CDM programs WNH has identified that customers lack the resources to effectively manage projects. WNH can leverage their CDM project experience and assist customers in the assessment, procurement, installation and commissioning processes thereby ensuring customers receive quality products and energy savings they can rely on at no cost.

**Power factor analysis**

GS>50 kW,  
Large Users

WNH through leveraging customer data cost effectively and efficiently provide analysis and assist customers that would benefit from power factor correction technologies.

**Assisting with navigating emerging energy technologies including, but not limited to**

Residential,  
GS <50 kW,

WNH can efficiently and cost effectively leverage the relationships and experience with energy efficiency technologies and CDM

<b>distributed energy resources (battery storage, solar PV, etc.), electric vehicle and associated charging infrastructure, and electrification</b>	GS>50 kW, Large User	programs and assist customers in navigating and assessing new technologies, building the business case, accessing incentive and grant programs and measuring and monitoring the performance of these new technologies.
<b>Energy and Water Benchmark Reporting</b>	GS>50 kW, Large Users	WNH can leverage their existing customer relationships and access to data and efficiently and cost effectively assist customers with their data and reporting requirements. In addition, WNH has the expertise to assist customers in reviewing and understanding their data, identify ways to reduce usage, implement projects thereby lowering their costs.

**Question:**

48. [Ex. 4-STAFF-54] Please confirm that the 2016 FTEs did not include the four FTEs funded by IESO for the CDM programs.

**Response:**

Confirmed.

**Question:**

49. [Ex. 4-STAFF-55] Please confirm that the simple average of the comparators for 2021 is \$269 per customer, and the weighted average of the comparators for 2021 is

\$262 per customer. Please advise if the Applicant believes achieving this average over time is a reasonable goal and, if so, the Applicant's plan to get there (which would require an OM&A reduction in 2021 of \$994,602 to get to the weighted average). Please confirm that, without the new Key Accounts Department, the forecast 2021 OM&A/customer for the Applicant would be \$274.

**Response:**

	Waterloo North Hydro Inc.	Kitchener-Wilmot Hydro Inc.	Burlington Hydro Inc.	Energy+ Inc.	Guelph Hydro Electric Systems Inc.	London Hydro Inc.	Oakville Hydro Electricity Distribution Inc.
	2021 Test	2021 Calculated OM&A	2021 Calculated OM&A	2021 Calculated OM&A	2021 Calculated OM&A	2021 Calculated OM&A	2021 Calculated OM&A
Number of Customers	58,506	96,827	67,940	65,402	55,673	159,039	72,108
Total Service Area (sq km)	683	425	188	562	93	423	139
Number of FTE	128	184	92	125	120	324	104
OM&A	16,331,021	20,405,639	19,481,482	18,487,807	17,231,337	40,595,133	19,336,539
Customer/FTE	456	526	738	523	464	491	693
Service Area/FTE	5	2	2	4	1	1	1
OM&A/Customer	279	211	287	283	310	255	268
OM&A/FTE	127,208	110,900	211,755	147,902	143,594	125,294	185,928

Simple Average 269

Weighted Average 262

Confirmed – The simple average of the comparators for 2021 is \$269 per customer.

Confirmed – The weighted average of the comparators for 2021 is \$262 per customer.

Without the new Key Accounts Department, the forecast 2021 OM&A/customer for WNH would be \$274.78. This is based on reducing the OM&A by \$254,568, providing an updated 2021 OM&A of \$16,076,453 instead of \$16,331,021.

WNH notes that while it is not at the average OM&A Cost per Customer, it is the median utility, i.e. out of seven utilities listed, WNH has three above and three below. WNH frequently reviews itself against comparators but does not have a specific goal to be at the average of the comparators. WNH also notes that while all LDC's are in the same industry, each utility has individual challenges and business approaches that impact OM&A Cost per Customer. For example, WNH has a large service territory for number

of customers it supports, therefore operating and maintenance costs may be higher than its peers.

**Question:**

50. [Ex. 4-STAFF-56(b)] Please explain who estimates the time spent on the parent company, who compiles the historical averages, and how, when and by whom the true-up is calculated. Please provide the report or working paper or presentation setting out the most recently completed allocations to the parent company for a completed year.

**Response:**

The President & CEO and Vice-President Finance & CFO of WNH estimate the time spent on the parent company and corroborate these estimates with individual employees. The CFO reviews time spent quarterly and performs the true-up then, if necessary.

Per Table 4-31 in Exhibit 4, p. 70 of the Application, in 2019 there was \$94,999 of Corporate Administration & Finance costs allocated to the parent company. This amount consists primarily of fully-allocated salaries and related expenses. WNH applies a 15% charge to all underlying salary and related burdens which recovers administration costs, return and PILs at WNH's weighted average cost of capital. The underlying salaries and related burdens are estimated based on a percentage of total time as follows:

- President & CEO: 12.5%
- Vice-President Finance & CFO: 10.0%
- Executive Assistant – CFO: 7.5%
- Sr. Financial Analyst: 5.0%

Based on the estimated actual time spent working on the parent company in 2019, management determined there was no need for a true-up.

If WNH was to provide the specific working paper which reconciles the exact amounts for 2019, one would be able to determine individual salaries and a redacted version would likely not be useful.

**Question:**

51. [Ex. 7-STAFF-63] Please explain how the billing team determines the complexity factor for each customer.

**Response:**

The Billing team determines the complexity factor based on the time required to prepare each bill and the weighted average of each bill type within the customer class. The time factor is relative to a bill prepared for a standard smart meter used for the Residential class. The time factors are presented in the table below.

Customer Type	Factor	Complexities Considered
Class A	6	- Power Invoice Class A separate handling - ICI Program maintenance - Separate settlement requirements
Net Meter	4	- Rate maintenance and checking - Additional information provided to customers - Initial set up and account maintenance in CIS
microFIT/FIT	3	- Data maintenance and checking - Reassignment - Payment change maintenance - Cheque/EFT processing
Interval	2	- Time to manage/maintain 3rd party software - Data maintenance and checking
Streetlight	2	- Time to manage/maintain 3rd party software - Initial set up and account maintenance in CIS
Unmetered Scattered Load	2	- Time to manage/maintain 3rd party software - Initial set up and account maintenance in CIS

When there are more than one of the above customer types within a rate class, a weighted average is used. This is applicable for GS<50kW and GS>50kW rate classes as described in the table below.

Customer Type	Factor	% of Class	Weighted Factor
<b>GS&lt;50kW</b>			
Standard	1	90.1%	0.90
microFIT/FIT	3	9.8%	0.29
Net Meter	4	0.1%	0.01
<b>GS&lt;50kW</b>			<b>1.20</b>
<b>GS&gt;50kW</b>			
Standard	1	81.6%	0.82
Interval	2	16.0%	0.32
Net Meter	4	0.3%	0.01
Class A	6	2.1%	0.13
<b>GS&gt;50kW</b>			<b>1.27</b>

**Question:**

52. [Ex. 9-STAFF-87] Please confirm that accelerated CCA has the effect that there is less CCA available in future years to reduce taxable income. Please explain how the Applicant proposes to ensure that the ratepayers are kept whole if half the benefit of the accelerated CCA is kept by the shareholders today, and in the future there is less CCA available to reduce PILs and therefore rates.

**Response:**

To confirm, WNH is proposing tax sharing of the accelerated CCA for the tax years 2019 and 2020 only. The OEB requires that the accelerated CCA is taken in full each year, therefore, regardless of the outcome of the proposed DVA, the CCA will not be available in future years. If in future years there is a legislated tax change, WNH's shareholders are expected to split the tax implication 50/50 with customers as per the OEB's long standing practice. WNH is proposing that this practice be symmetrical and receive a portion of the tax gain now.

**Question:**

53. [Ex. 1-CCC-1] Please confirm that no presentations, memos, reports or other written explanations of the 2020 & 2021 Operating and Capital Budget were provided to the Board of Directors or any Committee of the Board. If not confirmed, please provide all of those written materials.

**Response:**

This is not confirmed. Please see the Budget Package including the Manager's Summary and Requested Approvals included in WNH's IR responses - Attachment 11. The only other material given to the Board was a PowerPoint presentation that was given at the Board meeting of December 19, 2019. The purpose of the presentation was to provide an overview of the budget package. The pdf of the presentation is attached.

**Question:**

54. [Ex. 1-CCC-9] Please confirm that the forecast OM&A for the Test Year includes zero savings from productivity and efficiency initiatives. If not confirmed, please provide the savings from each initiative that have been included in the forecast OM&A.

**Response:**

This is not confirmed. Since 2016 there have been savings from productivity and efficiency initiatives however savings are embedded in the OM&A budgeting process. It is very difficult to quantify the savings from each initiative because WNH does not prepare a hypothetical OM&A budget for each initiative as if it was not undertaken.

**Question:**

55. [Ex. 1-CCC-18] Please confirm that the Applicant does not know why the Capital Price in the Benchmarking Model increased from 2017 to 2018. If not confirmed, please explain why the Capital Price increased.

**Response:**

Confirmed. WNH does not know why the Capital Price in the Benchmarking Model increased from 2017 to 2018.

The Capital Price from the Benchmarking Model is a formula that is used for all of the utilities that takes into consideration Asset Price Index, Depreciation Rate and Rate of Return. The rates used are the same across all utilities.

**Question:**

56. [Ex. 2-CCC-27] Please advise whether the proposed new Standby Charge will apply to Net Metered Generation.

**Response:**

WNH's proposal does not include applying Standby Charges to Net Metered Generation.

**Question:**

57. [Ex. 4-CCC-30; 4-EP-19(a); 4-SEC-34; 4-VECC-39] Please provide a full table of all costs related to the prior CDM programs for each of 2016-2020 (including those reimbursed by IESO), including all allocations from other departments, and a continuation showing where those costs now reside in the Test Year revenue

requirement, if at all. If the costs are no longer being incurred, please explain what happened to them. If the costs are being incurred, but at the expense of the ratepayers, please explain what benefit the ratepayers are getting for those additional costs.

**Response:**

Expense	2016 - Actual	2017 - Actual	2018 - Actual	2019 - Actual	2020 - Budget	2020 Budget Notes
Allocated Costs - Finance, IT, Communications, Building	181,637	122,280	145,944	119,280	42,814	Approved through wind-down budget
CDM Labour and Staff Related Costs (Training, Conferences, etc.)	394,912	546,756	528,280	441,963	163,873	Approved through wind-down budget
Third Party Costs	295,823	792,646	438,851	45,221	-	WNH does not budget for third party costs, this amount is anticipated to be minimal for 2020.
Incentives	349,818	986,682	1,807,827	1,499,909	-	WNH does not budget for incentive costs, this amount is anticipated to be minimal for 2020.
<b>Total Cost</b>	<b>1,222,190</b>	<b>2,448,364</b>	<b>2,920,902</b>	<b>2,106,373</b>	<b>206,687</b>	
<b>IESO Reimbursements</b>	<b>- 1,222,190</b>	<b>- 2,448,364</b>	<b>- 2,920,902</b>	<b>- 2,106,373</b>	<b>- 206,687</b>	These are not actual reimbursement amounts for 2020, however full cost recovery is expected through the wind-down budget for 2020.
<b>Net Cost to WNH</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	

The IT, Finance and Communications costs allocations are now included in OM&A in their respective areas. These costs were partial bodies who provided assistance to the CDM program at varying levels since 2016 in addition to an allocation of the Service Centre. These partial positions perform many other tasks within the utility and cannot be eliminated. For example, a portion of the CFO is allocated to provide oversight to the CDM program. However, this position is still required within the utility. The second component of costs relate to the Key Accounts Department as discussed in 4-SEC-34. The role of the Key Accounts Department is included in 4-Staff-49 and discussed in more detail in SEC-47. Last, the third party costs and incentives paid to run the specific CDM programs will no longer be incurred by the utility.

**Question:**

58. [Ex. 1-EP-3] Please provide the text of any changes to the Applicant's Conditions of Service arising due to the proposed new Standby Charge.

**Response:**

Please refer to IR response to 1-Staff-7.

**Question:**

59. [Ex. 2-EP-8(a)] Please confirm that the explanations for 2020 IT CAPEX include \$1,047,107 (73.9% of the 2020 capex) of capex below the materiality threshold, and so no explanation has been given, and there is a further \$330,930 (34.5%) of 2019 CWIP for which no explanation has been given. Please provide more complete explanations for this material spending.

**Response:**

**IT Asset Lifecycle - Hardware \$280,053:** Consists of the projects listed below as well as \$74,885 of miscellaneous hardware and labour.

<b>Item</b>	<b>2020 CAPEX</b>	<b>Description</b>
Server Upgrades	\$38,889	Replace aging server hardware for self-hosted applications
Laptop Replacements	\$43,985	WNH to replace 30 laptops that are at the end of their useful life
Desktop Replacements	\$31,185	WNH to replace 25 desktop computers that are at the end of their useful life
Corporate Wireless Replacement	\$91,109	WNH to replace existing wireless network equipment which is beyond end of life

**Other IT System Changes & Improvements \$353,410:** Consists of the projects listed below as well as \$19,907 of miscellaneous software improvements.

Item	2020 CAPEX	Description
System Control Wall Display	\$47,000	WNH to enhance control room operations with additional wall displays
HR/Payroll Solution	\$178,100	Replacement of core HR and payroll to meet new regulations and improve efficiency
Docova Database Upgrade	\$15,500	Upgrade to electronic document management system to move from Lotus Notes Domino to MSSQL
New WNH Website	\$71,289	Upgrade corporate website
ODS/MDM Integration	\$21,614	WNH to amalgamate its operational data store and meter data management platforms to create a single system of record for meter data

**Other IT New Systems & Services \$204,708:** Consists of the projects listed below as well as \$8,000 of miscellaneous software improvements.

Item	2020 CAPEX	Description
Asset Management Software	\$78,725	Enhancements to analytics and reporting
Settlement Software	\$99,983	WNH plans to implement software to better manage retail settlement and reduce operating costs
Service Request Application	\$18,000	WNH is expanding digital tool applications to field workers to better manage service requests from customers

**Other Operation Technology Software \$251,346:**

Item	2020 CAPEX	Description
Mobile Enterprise Web Services	\$74,903	Create web service connectivity between multiple systems to reduce manual work and increase data accuracy
AUD-GIS Integration Phase 1	\$100,869	WNH is integrating utility design software with ESRI's GIS platform
Platform - GN to UN Phase 1	\$75,574	Upgrade the ESRI GIS platform from geometric to utility network model

**Miscellaneous / Other 2019 CWIP \$330,930:** Consists of the projects listed below as well as \$90,587 of miscellaneous items.

Item	2019 CWIP	Description
System Upgrade - Automated Utilities	\$14,295	Capital work in progress for AUD
GIS BI & Web Services	\$28,883	Capital work in progress for GIS business intelligence
2017 GIS Asset Management	\$40,332	Capital work in progress for GIS asset management project
App Development - Mobile	\$29,556	Capital work in progress for mobile app development for field techs
ArcGIS Pro & Utility Network	\$17,664	Capital work in progress for GIS upgrades
O365 Migration	\$32,824	Capital work in progress for migration from Lotus Notes to Office 365
ERP	\$76,789	Capital work in progress for ERP improvements

**Question:**

60. [Ex. 2-EP-15] The pre-filed Table 5A showed 2017-2020 averages. Please update those averages after making whatever corrections were made in this new table.

**Response:**

The pre-filed Table 5-A showed 2016-2020 average and 2017-2020 average.

The table below provides the 2016-2020 average based on the updated changes.

Metric Category	Metric	Measures				% Change 2020-2016
		2019	2020	2021	2016-2020 Year Average	
Cost	Total Cost per Customer <sup>1</sup>	\$ 479	\$ 469	\$ 487	\$ 504	-28%
	Total Cost per km of Line <sup>2</sup>	\$ 16,813	\$ 16,480	\$ 17,146	\$ 17,578	-28%
	Total Cost per MW <sup>3</sup>	\$ 102,178	\$ 96,236	\$ 99,659	\$ 102,443	-24%
CAPEX	Total CAPEX per Customer	\$ 345	\$ 333	\$ 346	\$ 369	-37%
	Total CAPEX per km of Line	\$ 12,100	\$ 11,696	\$ 12,192	\$ 12,884	-36%
O&M	Total O&M per Customer	\$ 134	\$ 136	\$ 141	\$ 135	4%
	Total O&M per km of Line	\$ 4,713	\$ 4,784	\$ 4,954	\$ 4,694	5%

The table below provides the 2017-2020 average based on the updated changes.

Metric Category	Metric	Measures				% Change 2020-2017
		2019	2020	2021	2017-2020 Year Average	
Cost	Total Cost per Customer <sup>1</sup>	\$ 479	\$ 469	\$ 487	\$ 466	2%
	Total Cost per km of Line <sup>2</sup>	\$ 16,813	\$ 16,480	\$ 17,146	\$ 16,286	4%
	Total Cost per MW <sup>3</sup>	\$ 102,178	\$ 96,236	\$ 99,659	\$ 96,464	-1%
CAPEX	Total CAPEX per Customer	\$ 345	\$ 333	\$ 346	\$ 331	2%
	Total CAPEX per km of Line	\$ 12,100	\$ 11,696	\$ 12,192	\$ 11,556	3%
O&M	Total O&M per Customer	\$ 134	\$ 136	\$ 141	\$ 135	3%
	Total O&M per km of Line	\$ 4,713	\$ 4,784	\$ 4,954	\$ 4,731	4%

**Question:**

61. [Ex. 3-EP-16 (c)] The Applicant has several times said “the percentage reductions were based off the best available information at the time”. What was the nature and source of that information? Please provide details, and show how that information drove the changes proposed.



**Question:**

64. [Ex. 2-ED-9(c); 2-ED-12; 2-ED-13] Please explain why helping customers to use energy more efficiently by selecting the most efficient method of heating their buildings is not part of the mandate of the Key Accounts Department. Please explain why this would not include geothermal. Please explain why the Applicant has taken no steps to study the potential for geothermal to reduce its rates and make its operations more efficient, whether by increasing off-peak load, reducing on-peak load, or increasing electricity demand relative to natural gas demand.

**Response:**

It is within the mandate of the Key Accounts Department to help customers use energy more efficiently. WNH works with the customer to provide information on electricity savings, understanding their bill, and calculation of payback for systems the customer is considering purchasing, including geothermal. WNH does not select, size, recommend, engineer, install, or subsidize the adoption of any heating systems including geothermal. This is not part of their mandate. There are numerous private sector companies within WNH's service territory that provide these services on a competitive basis. WNH does not believe it is within WNH's mandate to use regulated electricity customer revenue to compete with these private sector companies.

The response in 2-ED-9c (ii) was given in the context of the potential of utilizing geothermal as a non-wires solution to alleviate distribution capacity constraints. The investment in geothermal by the wires company is considered outside of WNH's mandate.

WNH believes that given the current regulatory environment, its ability to make investments or subsidize a non-wires solution utilizing geothermal is uncertain. WNH is closely monitoring the OEB's ongoing consultation on Distributed Energy Resources (EB-2018-0288) and Utility Remuneration (EB-2018-0287) for guidance. As such, WNH

does not feel it is prudent at this time to direct current OM&A spending to perform studies to support such investments.

**Question:**

65. [Ex. 1-SEC-8] Please explain why the impacts of e-billing do not include customer care time spent by CSRs and others, changes to collections and bad debt, percentage of customers on pre-authorized payments, and other such impacts. What steps has the Applicant taken to investigate the full impact of e-billing on costs?

**Response:**

When discussing the savings of e-billing (or cost of paper bills), WNH only includes the incremental savings. There is no change in effort or cost between e-billing and paper bills related to CSRs, collections, bad debt or other impacts. The process is exactly the same up to the point of creating/rendering the Digital (PDF) bill. After that point, the PDF bills are sent to be printed and mailed or sent via email.

**Question:**

66. [Ex. 1-SEC-10] Please provide the benchmarking report of the compensation consultant referred to.

**Response:**

The benchmarking report includes a data base the Consultant purchased for their use. WNH does not have the benchmarking report. Please see response to SEC-67 for other reports.

**Question:**

67. [Ex. 1-SEC-11] Please confirm that no presentations, memos, reports or other written explanations of the proposed executive compensation plan were provided to the Board of Directors or any Committee of the Board. If not confirmed, please provide all of those written materials.

**Response:**

Not confirmed. In addition to the policy listed in 1-SEC-11, the Consultant presented the documents mentioned below to the Compensation and HR Committee of the Board in December 2015.

The Compensation and HR Committee provided a verbal update to an In-Camera session of the Board without Management present.

In response to this request, WNH is requesting approval from the Board to file the documents attached to this response in confidence. These documents and their summary descriptions are as follows:

- Executive Incentive Program Overview
  - Presentation slides from Marjorie Richards & Associates Ltd. (“Compensation Consultant”) on executive compensation and incentive pay.
- WNH Balanced Scorecard for 2016
  - Scorecard for WNH with description of various goals and criteria to be achieved by WNH for 2016. This formed part of the Executive Incentive Program Overview.
- Executive Total Compensation Salary Review
  - Presentation slides from the compensation consultant on its methodology in reviewing WNH’s executive compensation, findings, observations and recommendations.

- Executive Incentive Program S.M.A.R.T. Objective Guideline
  - Detailed guideline on S.M.A.R.T. and how to set and evaluate objectives using this methodology.
- Executive Objectives Setting and Evaluation Form
  - Example of completed Executive Objectives Setting and Evaluation form for WNH's President and CEO, showing the various objectives and evaluators.
- Tool with Example
  - Example of weighted rating calculation of bonus opportunity.

(collectively, the "Documents").

WNH requests that the Documents be kept in confidence pursuant to Rules 10.01 and 10.02 of the Board's *Rules of Practice and Procedure* and Sections 5.1.1 and 5.1.2 of the Board's *Practice Direction on Confidential Filings* (the "Practice Direction"). The nature of those documents and the basis for WNH's request for their confidential treatment are set out below:

### **Detailed Information Pertaining to Executive Objectives, Evaluation and Compensation**

The Documents contain information related to details WNH's Executive Incentive Program, Executives objective setting and evaluations. This is information used by the Compensation and HR Committee to determine performance of WNH executives and executive compensation, which if made public, can put WNH at a competitive disadvantage.

WNH submits that the disclosure of the Documents could reasonably be expected to prejudice WNH's position when competing against other utilities (such as Kitchener-Wilmot Hydro Inc., and Energy+ Inc.) or private businesses in the area for human resources talent. Disclosing WNH's executive compensation and evaluation scheme

and detailed objectives on the public record would put them in a competitive disadvantage vis-à-vis their competitors in the market. To the extent that high-level compensation strategy information is filed by those competitors in Exhibit 4 of their cost of service applications, WNH has also done the same in its Exhibit 4 at Section 2.4.3.1. However, those other competitors are not required to disclose their detailed executive evaluation and compensation plans and objectives but would have access to WNH's detailed executive evaluation and compensation plans and objectives if the Documents were disclosed. Those other competitors can then use that information to their advantage by adjusting their executive evaluation and compensation plans and objectives accordingly to compete against WNH.

Appendix "A" to the Practice Direction sets out the Board's considerations in determining requests for confidentiality. Among those considerations are the following:

- (a)(i) prejudice to any person's competitive position;
- (a)(iv) whether the disclosure would be likely to produce a significant loss or gain to any person; and
- (g) any other matters relating to FIPPA (the *Freedom of Information and Protection of Privacy Act*) and FIPPA exemptions.

With respect to item (g) above, the Board has provided a summary of pertinent FIPPA provisions at Appendix C of the Board's *Practice Direction on Confidential Filings* ("Practice Direction"). That summary provides, in part, as follows:

"Under section 17(1), the Board must not, without the consent of the person to whom the information relates, disclose a record where:

- (a) the record reveals a trade secret or scientific, technical, commercial, financial or labour relations information;
- (b) the record was supplied in confidence implicitly or explicitly; and
- (c) disclosure of the record could reasonably be expected to have any of the following effects:

- i. prejudice significantly the competitive position or interfere significantly with the contractual or other negotiations of a person, group of persons or organization;
- iii. result in undue loss or gain to any person, group, committee or financial institution or agency;  
..."

Disclosing WNH's executive compensation and evaluation scheme on the public record would put them in a competitive disadvantage vis-à-vis their competitors in the market as described above. It would be revealing commercial, financial and labour relations information that, if disclosed, would reasonably expected to result in undue loss on WNH's part in retaining talent in the labour market.

The Practice Direction recognizes that these are among the factors that the Board will take into consideration when addressing the confidentiality of filings. They are also addressed in section 17(1) of FIPPA, and the Practice Direction notes (at Appendix C of the Practice Direction) that third party information as described in subsection 17(1) of FIPPA is among the types of information previously assessed or maintained by the OEB as confidential.

### **Documents from Compensation Consultant**

The Documents were presented by the Compensation Consultant to the Compensation and HR Committee of the WNH's Board to develop an executive compensation plan.

The Documents were created and presented by the Compensation Consultant company that was hired by WNH for the purposes of advising WNH on executive compensation strategy. WNH submits that the disclosure of the Documents could reasonably be expected to prejudice the Compensation Consultant's position.

The Compensation Consultant is engaged in a competitive business and the disclosure of the details of their recommendations, strategies and plans for WNH related to executive compensation could reasonably be expected to prejudice the economic interest of, significantly prejudice the competitive position of, cause undue financial loss to, and be injurious to the financial interests of the Compensation Consultant. Their competitors can use this information to inform their own methodologies, recommendations, and plans while maintaining strict confidentiality of their internal methodologies, recommendations and plans, allowing them to gain an advantage over the Compensation Consultant.

Attached as SEC-67 Attachment 1 is a letter from the Compensation Consultant setting out their position on the confidentiality of the Documents.

The Board's considerations in determining requests for confidentiality have been set out above.

The Practice Direction recognizes that these are among the factors that the Board will take into consideration when addressing the confidentiality of filings. They are also addressed in section 17(1) of FIPPA, and the Practice Direction notes (at Appendix C of the Practice Direction) that third party information as described in subsection 17(1) of FIPPA is among the types of information previously assessed or maintained by the OEB as confidential.

In accordance with the Practice Direction, confidential copies of the Documents will be delivered to the Registrar under separate cover marked "Confidential".

**Question:**

68. [Ex. 1-SEC-18] Please provide the calculations underlying the table.

**Response:**

WNH has included the Benchmarking Spreadsheet Forecast Model under the three scenarios listed. Please see the orange-filled cells in 'Model Inputs' tab for the scenario. Then please go to 'Results' tab for the orange filled cell that match the table provided in 1-SEC-18.

**Question:**

69. [Ex. 1-SEC-19] Please provide the financials of the parent company in confidence during the ADR.

**Response:**

WNH is open to the discussion of this topic during the ADR.

**Question:**

70. [Ex. 1-SEC-22] Please advise whether a) the Applicant has as yet taken no steps to research and develop new product and service offerings, or b) research and development has been done, but no internal documentation has been prepared, or c) neither of the above (please explain).

**Response:**

WNH has installed suite metering for some customers and does provide net metering to its customers. Key account people have helped develop this work. No further research has been done on other offerings or on lessons learned from other LDCs due to the impact of the pandemic.

WNH also did work on developing virtual net metering and third party virtual net metering however, the regulations allowing this did not proceed. WNH is also actively monitoring the Ministry of Energy, Northern Development and Mines' proposed changes to O.Reg. 541/05 posted to the Ontario Environmental Registry on October 8, 2020 (Proposal Number 20-ENDM026), pursuant to which the Ministry is seeking input on a proposal for community net metering demonstration projects. Community net metering refers to a net metering arrangement that allows for the transfer or sharing of credits from generation facilities within a community across multiple metered accounts. Enabling community net metering demonstration projects would provide customers and developers more options to participate in net metering initiatives that may help lower the community's costs and meet sustainability goals.

**Question:**

71.[Ex. 1-SEC-24] Please confirm that the cost of the UW upgrade is material. Please advise which rate classes will bear the cost of that upgrade, and in what proportions.

**Response:**

UW's new connection to WNH's distribution system is being constructed by UW at 100% their cost. WNH's work in 2021 will accommodate the new connection and the costs are not material. This work is part of a contingency enhancement project involving the construction of a tie lines between two WNH transformer stations. In exchange for advancing this section of the work, UW is granting easements to WNH that will allow it to complete the future construction of the tie lines.

As the ties line benefit all customers, all rate classes will bear the costs of WNH funded work in accordance with the cost allocation model.

**Question:**

72. [Ex. 4-SEC-35; updated App. 2-BA] Please confirm that the change in depreciation rate on the CIS/ERP software from 5 years to 10 years resulted in the December 31, 2020 net fixed assets for that software increasing from \$467,086 (existing 5 year life) to \$1,175,581 (new 10 year life), an increase to opening rate base of \$708,495. Please confirm that the impact on Test Year revenue requirement is to decrease depreciation by \$188,408 and increase cost of capital by \$43,667, with no PILs impact, for a net reduction in revenue requirement of \$144,741.

**Response:**

Confirmed.

**Question:**

73. [Ex. 2-VECC-20] Please provide the basis, in OEB policy or rules, for using the higher power supply expense in calculating working capital allowance.

**Response:**

As per the Chapter 2 Filing Requirements, according to Section 2.2.1.3 – Allowance for Working Capital, “The commodity price estimate used to calculate the Cost of Power must be determined by the split between RPP and non-RPP Class A and Class B customers based on actual data and using the most current RPP (TOU) prices established for the November 1, 2019 to October 31 30, 2020 period. The calculation must include the impact of the Ontario Electricity Rebate of 31.8% on the total bill. Distributors must complete Appendix 2-Z – Commodity Expense.”

This has been revised in the updated models.

**Question:**

74. [Ex. 3-VECC-23] Please advise the extent, if any, to which the “energy conserved outside of formal programs” is already captured in the regressions from past energy consumed.

**Response:**

By including Persistent CDM as an explanatory variable in historical energy consumed, the coefficient calculated as part of the regression model inherently includes a portion of energy conserved outside of formal programs. Specifically, in the revised Load Forecast submitted as part of WNH’s response to 1-Staff-1, the coefficient for Persistent CDM is -1.91. This indicates that for every 1 kWh of Persistent CDM, there is a reduction in overall kWh purchased of 1.91 kWh. 1.0 kWh would be directly related to Persistent CDM with the remaining 0.91 relating to energy conserved outside of formal programs.

**Question:**

75. [Ex. 4-VECC-47] Please identify where in the table provided we would find the “total amount of employee compensation capitalized in each year”.

**Response:**

Please see the table below which includes the “total amount of employee compensation capitalized in each year”.

	2016 Board Approved*	2016 Actual	2017 Actual	2018 Actual	2019 Actual	2020 Bridge	2021 Test
<b>Average Number of Employees (FTEs including Part-Time)</b>							
Management (including executive)	26	26	24	22	22	23	24
Non-Management (union and non-union)	106	104	101	102	100	99	104
<b>Total</b>	<b>132</b>	<b>130</b>	<b>125</b>	<b>124</b>	<b>122</b>	<b>122</b>	<b>128</b>
<b>Total Salary and Wages including overtime and incentive pay</b>							
Management (including executive) Capital	\$ 752,618	\$ 970,965	\$ 923,391	\$ 585,173	\$ 563,133	\$ 674,058	\$ 691,570
Management (including executive) Operating	\$ 2,257,852	\$ 2,272,316	\$ 2,211,379	\$ 2,406,730	\$ 2,089,958	\$ 2,472,045	\$ 2,673,517
Non-Management (union and non-union) - Capital	\$ 3,127,981	\$ 3,231,635	\$ 3,104,865	\$ 2,999,710	\$ 3,341,897	\$ 3,260,752	\$ 3,463,908
Non-Management (union and non-union) - Operating	\$ 5,115,216	\$ 5,284,722	\$ 5,433,356	\$ 5,757,644	\$ 5,787,400	\$ 5,723,866	\$ 6,080,482
<b>Total</b>	<b>\$ 11,253,667</b>	<b>\$ 11,759,638</b>	<b>\$ 11,672,991</b>	<b>\$ 11,749,257</b>	<b>\$ 11,782,388</b>	<b>\$ 12,130,721</b>	<b>\$ 12,909,477</b>
<b>Total Benefits (Current + Accrued)</b>							
Management (including executive) Capital	\$ 175,299	\$ 217,706	\$ 217,606	\$ 135,321	\$ 130,904	\$ 154,353	\$ 154,895
Management (including executive) Operating	\$ 525,895	\$ 509,489	\$ 521,134	\$ 556,556	\$ 485,823	\$ 566,073	\$ 598,804
Non-Management (union and non-union) - Capital	\$ 766,870	\$ 767,193	\$ 727,835	\$ 687,085	\$ 779,578	\$ 745,076	\$ 795,368
Non-Management (union and non-union) - Operating	\$ 1,254,071	\$ 1,254,597	\$ 1,273,674	\$ 1,318,790	\$ 1,350,052	\$ 1,307,893	\$ 1,396,176
<b>Total</b>	<b>\$ 2,722,135</b>	<b>\$ 2,748,985</b>	<b>\$ 2,740,249</b>	<b>\$ 2,697,752</b>	<b>\$ 2,746,357</b>	<b>\$ 2,773,395</b>	<b>\$ 2,945,243</b>
<b>Total Compensation (Salary, Wages, &amp; Benefits)</b>							
Management (including executive)	\$ 3,711,664	\$ 3,970,476	\$ 3,873,510	\$ 3,683,780	\$ 3,269,818	\$ 3,866,529	\$ 4,118,786
Non-Management (union and non-union)	\$ 10,264,138	\$ 10,538,147	\$ 10,539,730	\$ 10,763,229	\$ 11,258,927	\$ 11,037,587	\$ 11,735,934
<b>Total</b>	<b>\$ 13,975,802</b>	<b>\$ 14,508,623</b>	<b>\$ 14,413,240</b>	<b>\$ 14,447,009</b>	<b>\$ 14,528,745</b>	<b>\$ 14,904,116</b>	<b>\$ 15,854,720</b>
<b>TOTAL CAPITAL</b>	<b>\$ 4,822,768</b>	<b>\$ 5,187,499</b>	<b>\$ 4,973,697</b>	<b>\$ 4,407,289</b>	<b>\$ 4,815,512</b>	<b>\$ 4,834,239</b>	<b>\$ 5,105,741</b>
<b>TOTAL OPERATING</b>	<b>\$ 9,153,034</b>	<b>\$ 9,321,124</b>	<b>\$ 9,439,543</b>	<b>\$ 10,039,720</b>	<b>\$ 9,713,233</b>	<b>\$ 10,069,877</b>	<b>\$ 10,748,979</b>

## **VECC Pre-Settlement Questions**

### **VECC-63**

REFERENCE: Waterloo IRR Load Forecast\_2021\_COS\_20200928,  
Changes Tab and CDM Activity Tab

9-Staff-79

2019 P&C Report

3-Staff-36, Attachment 3

### **Question:**

- a) It is noted that the updated load forecast model (CDM Activity Tab, Cell E14) uses 15,138,100 kWh as the total annual CDM savings in 2016 from 2016 programs. The model's Changes Tab indicates that this is based on the response to Staff 79 which seeks to reconcile the 2019 P&C Reports reported results for 2016 with those in the IESO's 2015-2017 Savings Persistence Report. However, neither report appears to set out 15,138,100 kWh as the savings in 2016 from 2016 programs. The 2019 P&C Report shows a value of 15,668,897 kWh (LDC Progress Tab, Cell CD105) and the 2015-2017 Persistence Report shows a value of 15,699,334 kWh (LDC Savings Persistence Tab, Sum of Cells CH345 + CH430 – as used in the original load forecast). Please provide the source/basis for the 15,138,100 kWh value used in the updated load forecast and the source/bases for the persisting values for 2016 CDM program impacts in 2017-2021.
- b) It is noted that the updated load forecast model (CDM Activity Tab, Cell F15) uses 26,176,264 kWh as the total annual CDM savings in 2016 from 2016 programs. The model's Changes Tab indicates that this is based on the response to Staff 79 which seeks to reconcile the 2019 P&C Reports reported results for 2017 with those in the IESO's 2015-2017 Savings Persistence Report. However, neither report appears to set out 26,176,264 kWh as the

savings in 2017 from 2017 programs. The 2019 P&C Report shows a value of 24,748,612 kWh (LDC Progress Tab, Cell CG105) and the 2015-2017 Persistence Report shows a value of 26,195,382 kWh (LDC Savings Persistence Tab, Cell CI515 – as used in the original load forecast). Please provide the source/basis for the 26,176,264 kWh value used in the updated load forecast and the source/bases for the persisting values for 2017 CDM program impacts in 2018-2021.

- c) What is the source of the values reported in Attachment 3 (LRAM&LF Summary Tab) and, in particular, have the results been verified by the IESO?

**Response:**

- a) WNH notes that the updated load forecast model (CDM Activity Tab, cell E14) is 15,538,100 kWh, not 15,138,100 as quoted above. This amount corresponds to Actual CDM Savings in 2016 per the revised LRAMVA Workform tab 5. 2015-2020 LRAM as submitted as part of WNH's response to 1-Staff-1. This is the total program savings per tab 7. Persistence Report. This value consists of 15,699,334 kWh of savings from the 2015-2017 Persistence Report (quoted above), less the 161,234 kWh adjustment specifically related to the Save on Energy Retrofit program as described in 9-Staff-79 which is sourced from the 2019 P&C Report. Persistence of these savings are per the 2015-2017 Persistence Report with the same adjustment above persisting each year for 2017-2021.
- b) WNH notes that the updated load forecast model (CDM Activity Tab, cell F15) relates to 2017 savings from 2017 programs, not 2016 as quoted above. This amount corresponds to Actual CDM Savings in 2017 per the revised LRAMVA Workform tab 5. 2015-2020 LRAM as submitted as part of WNH's response to 1-Staff-1. This is the total program savings per tab 7. Persistence Report. This value consists of 26,195,382 kWh of savings from the 2015-2017 Persistence

Report (quoted above), less the 19,118 kWh adjustment specifically related to the Save on Energy Retrofit program as described in 9-Staff-79 which is sourced from the 2019 P&C Report. Persistence of these savings are per the 2015-2017 Persistence Report with the same adjustment above persisting each year for 2018-2021.

- c) Please refer to the Program Summary tab of Attachment 3 for a description of the source for each program savings. Column Q of the Project Detail tab indicates whether or not the savings were included in the April 2019 P&C Report (verified) or not.

**VECC-64**

REFERENCE: Waterloo\_IRR\_RRWF\_2021\_COS\_20200928, Tracking Tab  
3-Staff 38

**Question:**

- a) Staff 38 indicates that, as result of the IR, Retail Service Revenues would increase by \$24,500. However, the Updated RRWF only shows an increase of \$11,639. Please reconcile.

**Response:**

Per revised App. 2-H in the Chapter 2 Appendices per WNH's response to 1-Staff-1, 4082 Retail Services Revenues have increased \$24,500 from \$36,000 to \$60,500. However, the associated costs recorded in 4084 Service Transaction Requests have increased \$12,851 from \$18,000 to \$30,851. The net result is \$11,649 which corresponds to the increase in Other Distribution Revenue as described in adjustment 14 on tab 3. Data Input Sheet of the updated RRWF.

**VECC-65**

REFERENCE: 3-VECC-35 a)

Waterloo\_IRR\_2021\_Filing\_Requirements\_Chapter2\_Appendices

**Question:**

- a) Are there any revenues from Service Transaction Requests that are recorded in Account #4084?
- i. If not, why not?
  - ii. If yes, please provide a breakdown of the 2018-2021 amounts included in Account \$4084 for i) Revenues from STRs and ii) Costs associated with Retail Services Revenues such the net amounts reconcile with the values in Appendix 2-H.

**Response:**

The revenues from Service Transaction Requests are first recorded in Service Transaction Requests (USoA 4084) and moved into Retail Services Revenue (USoA 4082) at yearend. As per 3-VECC-35 a), this is done to easily track costs in WNH's ERP system and to clearly see the revenue and costs for Retail Services Revenue. The revenue from Service Transaction Requests are negligible wherein the 2018 and 2019 revenues were \$208 and \$473, respectively.

**VECC-66**

REFERENCE: 7-Staff 63

7-VECC 54

**Question:**

PREAMBLE: It is noted that for a number of the billing and collecting activities the allocation utilizes a billing complexity factor.

- a) The response to Staff 63 states: “The Billing Complexity factor is calculated on the Billing Complexity tab”. However, there is no file associated with the response or corresponding Billing Complexity tab. Please explain how the relative billing complexity for each rate class was determined.
- b) It appears that the billing complexity factor used for the Embedded Distributor is the same as that for the Residential class. Please confirm if this is the case and, if so, explain why.

**Response:**

- a) Please refer to WNH’s response to follow-up question SEC-51 where WNH has provided the calculation of billing complexity factor.
- b) Confirmed. WNH’s billing team estimates that the bill preparation for the Embedded Distributor is similar to that of a standard Residential bill and therefore has made the complexity factor 1.0.

**VECC-67**

REFERENCE: 7-VECC 55

Waterloo\_IRR\_Cost\_Allocation\_Model\_2021\_COS\_20200928, Tab I3

**Question:**

PREAMBLE: There are no costs forecast for Account #5175 for 2021.

- a) Is this because there are no Meter Maintenance costs forecast to be incurred in 2021 or are the costs included in another account?

**Response:**

Currently the WNH Metering department does not separately track their time between operation and maintenance. All expenses are recorded under 5065 Meter Expense.

**VECC-68**

REFERENCE: 7-Staff 66

Waterloo\_IRR\_Tariff\_Schedule\_and\_Bill\_Impact\_Model\_2021\_COS\_20200928

**Question:**

- a) The response to Staff 66 e) suggests that standby charges will apply to all load displacement generation. Also, the proposed Standby Tariff Sheet does not make reference to any “exclusions”. However, Staff 66 f) implies that the charges will only apply to load displacement generation greater than or equal to 10 kW. Please reconcile.

**Response:**

The standby charge applies to:

1. all General Service customers whose average monthly maximum demand used for billing purposes is equal to or greater than, or is forecast to be equal to or greater than, 50 kW but less than 5,000 kW, and
2. All Large Use customers whose average monthly maximum demand used for billing purposes is equal to or greater than, or is forecast to be equal to or greater than, 5,000 kW with Load Displacement Generation greater than or equal to 50 kW.

Standby Charges do not apply to Net-Metered Generators. Further servicing details are available in the distributors' Conditions of Service.

**VECC-69**

REFERENCE: 7-Staff 66

7-SEC 37

**Question:**

- a) With respect to Staff 66 a) and the determination of the Variable Capacity Reserve Value, please clarify the basis for the "Coincident peak of (Required Load + Generation Level)". For a given month is it based on the coincident peak for the metered load and generation output for that month?
  
- b) Would the Load Curtailment reduction apply even if the customer planned to implement it in months where the generation was in operation at the time of the customer's peak demand?

**Response:**

- a) Yes.
  
- b) Yes, provided the Customer has met the burden of proof that the load shedding system is automatic, instantaneous, and linked to the operating state of the generation.

**VECC-70**

REFERENCE: 7-Staff 69 and Attachment 8

**Question:**

- a) With respect to Attachment 8, please indicate whether the customers downstream of each of Meter 3, Meter 4, Meter 5 and Meter 7 are HONI customers or WNH customers.
  
- b) Based on the response to part (a) please explain how (per Staff 69) Hydro One paying WNH an energy charge based on the difference between Meter 6 and Meter 7 effectively captures the energy required by HONI's customers.
  
- c) Based on the response to part (a) please explain how (per Staff 69) WNH paying Hydro One retail RTSR charges and LV charges based on Meter 2 minus the difference between Meter 6 and Meter 7 effectively captures the usage by WNH's customers.

**Response:**

- a) The customers downstream of Meter 3, Meter 4 and Meter 5 are HONI customers. The customers down stream of Meter 7 are WNH customers.
  
- b) All of the customers between Meter 6 and Meter 7 are HONI customers. The meters are located at the beginning and end of the embedded distributor's pole line which is located within WNH service territory. The difference between Meter 6 and Meter 7 equals the energy usage by HONI's customers.
  
- c) The customers between Meter 2 and Meter 6 are WNH Customers. The customers between Meter 6 and Meter 7 are HONI customers. The customers beyond Meter 7 are WNH customers. HONI pays the IESO for 100% of the RTSR and LV charges based on Meter 2. The formula  $\text{Meter 2} - (\text{Meter 6} - \text{Meter 7})$  effectively captures the usage by all WNH customers.

## **VECC-71**

REFERENCE: Exhibit 8, pages 10 and 18

### **Question:**

- a) Please confirm that HONI uses gross load billing in the application of its ST Rates (charged to embedded distributors) per Note 14 of HONI's approved 2020 distribution tariffs.
- b) Do either of WNH's other host distributors apply gross load billing for distribution service provided to WNH? If yes, which ones?
- c) Will generation operated by any of WNH's load displacement generation customers impact the determination of the billing determinants used by those host distributors that employ gross load billing? If yes, please indicate which host distributors are involved and the anticipated impact on the billed kW for 2021.

### **Response:**

- a) WNH, to date has not received Gross Load Billing (GLB) charges from HONI as WNH currently does not have customers where this would apply however they are coming on line in 2021. WNH anticipates that when there are applicable customers that HONI will charge GLB in accordance with their rate order.
- b) Similar to a), WNH does not currently have customers on line that GLB will apply to from other host distributors, however, there is an applicable project expected in 2021 that is fed by Energy +. Energy + has GLB approved in their distribution tariffs. Kitchener-Wilmot Hydro does not have GLB approved in their distribution tariffs.

- c) WNH does not have any historical information to determine if the billing determinants will be impacted by the load displacement customers. WNH will need to determine if the load displacement changes the coincident peak and therefore billing determinants for HONI and Energy +. WNH cannot provide kW estimates at this time as all of the customers who qualify for GLB are planning to use load displacement solely for GA avoidance and are not yet in service.

## **Environmental Defence Pre-Settlement Question**

### **Question:**

Re 2-ED-3: Please clarify whether the loss figures cited herein include transmission losses upstream of the distributor. If not, please reproduce the interrogatory response including upstream losses.

### **Response:**

WNH's losses quoted in 2-ED-3 do not include transmission line losses. WNH does not own the transmission lines supplying its stations and as such, WNH cannot estimate these upstream transmission losses.

At its transmission connected transformer stations, WNH's wholesale metering points are located on the low voltage side of the transformer stations. The purchased kWh's on which the losses are calculated include an uplift by the IESO which includes the losses at these stations.

**ATTACHMENTS TO RESPONSES TO CLARIFICATION QUESTIONS**

## SEC-39 - Customer Comments

Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of  
[REDACTED]

Mon 7/27/2020 2:31 PM

To: [REDACTED]  
[REDACTED]

Thank you for your e-mail; we understand your concern. The rate application that Waterloo North Hydro submitted to the Ontario Energy Board is effective January 1, 2021. Waterloo North Hydro completes this type of filing once every five years and the process to prepare this application began in early 2019.

Should you have further concerns, please review the notice which explains that you can file a letter with your comments, which will be considered during the hearing.

For your convenience, here is a link to the notice: [https://www.wnhydro.com/en/our-company/resources/Regulatory\\_Filings/2021-Rate-Application/Notice\\_Waterloo-North-Hydro\\_20200720.pdf](https://www.wnhydro.com/en/our-company/resources/Regulatory_Filings/2021-Rate-Application/Notice_Waterloo-North-Hydro_20200720.pdf)

In addition, effective July 13, 2020, the Government of Ontario confirmed that it is making funds available for the COVID-19 Energy Assistance Program (CEAP), to support residential customers struggling to pay their energy bills as a result of the COVID-19 emergency through its utility. CEAP provides a one time, on-bill credit to eligible residential electricity customers to help them catch up on their energy bills and resume regular payments. Customers need to meet the eligibility criteria to receive the credit.

To learn more or to apply, please visit <https://www.wnhydro.com/en/your-home/covid-19-emergency-assistance-program.asp>

If you have any questions, please contact us at 519-886-5090.

Regulatory Team  
Waterloo North Hydro Inc.

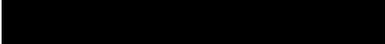
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**From:** [REDACTED]  
**Sent:** Thursday, July 23, 2020 2:17 PM  
**To:** [REDACTED]  
**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

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Have you guys not heard there is still a pandemic?



On Jul 23, 2020, at 2:15 PM, Waterloo North Hydro  wrote:



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**Learn more. Have your say.**

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General Service less than 50 kW (2,000 kWh)	\$4.81 per month

Other customers may also be affected.

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- charge current and future General Service 50 kW to 4,999 kW and Large Use customers who have load displacement generation, on a gross load billing basis

It is important to review the application carefully to determine whether you may be affected by these changes.

**THE ONTARIO ENERGY BOARD IS HOLDING A PUBLIC HEARING**

The Ontario Energy Board (OEB) will hold a public hearing to consider the application filed by Waterloo North Hydro. At the end of this hearing, the OEB will decide what, if any, rate increase will be allowed.

Distributors such as Waterloo North Hydro typically apply for a full review of their rates every five years. Any rate changes for the years in between are made by applying an OEB-approved formula which is tied to inflation and other factors intended to promote efficiency. You may not get notice of future rate changes made by applying the formula.

The OEB is an independent and impartial public agency. We make decisions that serve the public interest. Our goal is to promote a financially viable and efficient energy sector that provides you with reliable energy services at a reasonable cost.

**BE INFORMED AND HAVE YOUR SAY**

You have the right to information regarding this application and to be involved in the process.

- You can review Waterloo North Hydro's application on the OEB's website now.
- You can file a letter with your comments, which will be considered during the hearing.
- You can become an active participant (called an intervenor). As an intervenor, you can ask questions about Waterloo North Hydro's application and make arguments on whether the OEB should approve Waterloo North Hydro's request. Apply by **August 10, 2020** or the hearing will go ahead without you and you will not receive any further notice of the proceeding.
- At the end of the process, you can review the OEB's decision and its reasons on our website.

**LEARN MORE**

These proposed charges relate to Waterloo North Hydro's distribution services. They make up part of the Delivery line - one of the line items on your bill. Our file number for this case is **EB-2020-0059**. To learn more about this hearing, find instructions on how to file letters or become an intervenor, or to access any document related to this case, please select the file number **EB-2020-0059** from the list on the OEB website: [www.oeb.ca/notice](http://www.oeb.ca/notice). You can also phone our Consumer Relations Centre at 1-877-632-2727 with any questions.

**ORAL VS. WRITTEN HEARINGS**

There are two types of OEB hearings – oral and written. Waterloo North Hydro has applied for a written hearing. The OEB will determine at a later date whether to proceed by way of a written or oral hearing. If you think an oral hearing is needed, you can write to the OEB to explain why by **August 10, 2020**.

**PRIVACY**

If you write a letter of comment, your name and the content of your letter will be put on the public record and the OEB website. However, your personal telephone number, home address and email address will be removed. If you are a business, all your information will remain public. If you apply to become an intervenor, all information will be public.

This rate hearing will be held under section 78 of the Ontario Energy Board Act, 1998, S.O. 1998 c.15 (Schedule B).



To view the full Rate Application, please click [here](#) or visit [www.wnhydro.com/rateapplication](http://www.wnhydro.com/rateapplication).

To contact us, please call our Regulatory Affairs team at 519-886-5090 weekdays between 8:30 am and 4:30 pm or reach us by email at [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com).

Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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Sent by [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com) powered by



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Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Mon 7/27/2020 2:35 PM

To: [REDACTED]

Hello [REDACTED],

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Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]

**Sent:** Thursday, July 23, 2020 2:21 PM

**To:** Regulatory Regulatory <regulatory@wnhydro.com>

**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

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or click on links from unknown senders or in unexpected email \*\*\*

You want to increase rates when people are out of work because of Covid? What kind of timing is that ??

Where do I sign to petition against this.

Thanks



Sent from my iPhone

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Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Mon 7/27/2020 2:40 PM

To: [REDACTED]

Hello [REDACTED],

Thank you for your e-mail; we appreciate your comment. The rates that are frozen is the new fixed electricity price of 12.8 ¢/kWh for customers that are on time-of-use (TOU) prices till October 31, 2020. This rate has been determined by the Government on Ontario.

The rate application that Waterloo North Hydro submitted to the Ontario Energy Board is for the Delivery Charge that is on your bill effective January 1, 2021.

Should you have further concerns, please review the notice which explains that you can file a letter with your comments, which will be considered during the hearing.

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Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]

**Sent:** Thursday, July 23, 2020 2:23 PM

**To:** Regulatory Regulatory <regulatory@wnhydro.com>

**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

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What is this all about? I thought the rates were frozen, for a few months? Please explain! Thank you!

[REDACTED]  
Sent from my BlackBerry device on the Rogers Wireless Network

---

**From:** Waterloo North Hydro <regulatory@wnhydro.com>

Date: Thu, 23 Jul 2020 14:15:35 -0400 (EDT)

To: [REDACTED]

ReplyTo: regulatory@wnhydro.com

Subject: Waterloo North Hydro: Notice of Hearing



## Notice of Hearing

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- charge current and future General Service 50 kW to 4,999 kW and Large Use customers who have load displacement generation, on a gross load billing basis

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**BE INFORMED AND HAVE YOUR SAY**

You have the right to information regarding this application and to be involved in the process.

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- You can file a letter with your comments, which will be considered during the hearing.
- You can become an active participant (called an intervenor). As an intervenor, you can ask questions about Waterloo North Hydro's application and make arguments on whether the OEB should approve Waterloo North Hydro's request. Apply by **August 10, 2020** or the hearing will go ahead without you and you will not receive any further notice of the proceeding.
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**LEARN MORE**

These proposed charges relate to Waterloo North Hydro's distribution services. They make up part of the Delivery line - one of the line items on your bill. Our file number for this case is **EB-2020-0059**. To learn more about this hearing, find instructions on how to file letters or become an intervenor, or to access any document related to this case, please select the file number **EB-2020-0059** from the list on the OEB website: [www.oeb.ca/notice](http://www.oeb.ca/notice). You can also phone our Consumer Relations Centre at 1-877-632-2727 with any questions.

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**PRIVACY**

*If you write a letter of comment, your name and the content of your letter will be put on the public record and the OEB website. However, your personal telephone number, home address and email address will be removed. If you are a business, all your information will remain public. If you apply to become an intervenor, all information will be public.*

*This rate hearing will be held under section 78 of the Ontario Energy Board Act, 1998, S.O. 1998 c.15 (Schedule B).*

The logo of the Ontario Energy Board, featuring a stylized figure holding a torch and a scale, with the text 'Ontario Energy Board' and 'Commission de l'énergie de l'Ontario' below it.

To view the full Rate Application, please click [here](#) or visit [www.wnhydro.com/rateapplication](http://www.wnhydro.com/rateapplication).

To contact us, please call our Regulatory Affairs team at 519-886-5090 weekdays between 8:30 am and 4:30 pm or reach us by email at [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com).

Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Mon 7/27/2020 2:51 PM

To: [REDACTED]

📎 1 attachments (26 KB)

Waterlo-North-Hydro-2021-Rate-Application-Exhibit-1-Revised-Board-File-No-EB-2020-0059-Customer Summ.pdf;

Hello [REDACTED],

Thank you for your e-mail; we appreciate your comment. The rate application that Waterloo North Hydro submitted to the Ontario Energy Board is for the Delivery Charge that is on your bill effective January 1, 2021. The rates you are referring to are Time-of-Use (TOU) rates set by the Province of Ontario. Waterloo North Hydro does not mark up the cost of electricity (TOU); what customers pay to us is paid directly to the Independent Electricity System Operator (IESO) who is responsible for operating the electricity market.

In Exhibit 1, there is a Customer Summary that will provide you details of the rate application. We have attached the excerpt from Exhibit 1 in this e-mail.

Should you have further concerns, please review the notice which explains that you can file a letter with your comments, which will be considered during the hearing.

For your convenience, here is a link to the notice: [https://www.wnhydro.com/en/our-company/resources/Regulatory\\_Filings/2021-Rate-Application/Notice\\_Waterloo-North-Hydro\\_20200720.pdf](https://www.wnhydro.com/en/our-company/resources/Regulatory_Filings/2021-Rate-Application/Notice_Waterloo-North-Hydro_20200720.pdf)

If you have any questions, please contact us at 519-886-5090.

Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]

**Sent:** Thursday, July 23, 2020 2:31 PM

**To:** Regulatory Regulatory <regulatory@wnhydro.com>

**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

\*\*\* This is an EXTERNAL email. DO NOT open attachments, enable editing or macros, or click on links from unknown senders or in unexpected email \*\*\*

Why don't you tell us the reasons why WNH is asking for an increase? You just raised rates about 20 per cent and the province is doing everything possible to keep rates down. What is really going on here??



Sent from my BlackBerry 10 smartphone on the TELUS network.

---

**From:** Waterloo North Hydro

**Sent:** Thursday, July 23, 2020 2:15 PM

**To:** [Redacted]

**Reply To:** regulatory@wnhydro.com

**Subject:** Waterloo North Hydro: Notice of Hearing

---



## Notice of Hearing

Dear Valued Customer:

Waterloo North Hydro Inc. has applied to the Ontario Energy Board to increase our electricity distribution rates. Please review the Ontario Energy Board's **Notice of Hearing** to learn more and to find out how you can participate in the Ontario Energy Board's hearing.

ONTARIO ENERGY BOARD NOTICE  
TO CUSTOMERS OF WATERLOO NORTH HYDRO INC.

**Waterloo North Hydro Inc. has applied to raise its electricity distribution rates and other charges.**

**Learn more. Have your say.**

Waterloo North Hydro Inc. has applied to the Ontario Energy Board to raise its electricity distribution rates effective January 1, 2021. If the application is approved as filed, a typical residential customer and a typical general service customer of Waterloo North Hydro would see the following increases:

Residential (750 kWh)	\$0.70 per month
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Other customers may also be affected.

Waterloo North Hydro Inc. has also applied for approval to:

- change four Specific Services Charges, related to providing reconnection at meter and reconnection at pole/transformer – during and after regular hours
- establish new standby charges for the General Service 50 kW to 4,999 kW and Large Use customer classes
- charge current and future General Service 50 kW to 4,999 kW and Large Use customers who have load displacement generation, on a gross load billing basis

It is important to review the application carefully to determine whether you may be affected by these changes.

**THE ONTARIO ENERGY BOARD IS HOLDING A PUBLIC HEARING**

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**LEARN MORE**

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To view the full Rate Application, please click [here](#) or visit [www.wnhydro.com/rateapplication](http://www.wnhydro.com/rateapplication).

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Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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### 2.1.3 CUSTOMER SUMMARY

Waterloo North Hydro (WNH) has applied to the Ontario Energy Board for a change in the distribution rates that it charges its customers. The distribution rates are based on the amount of capital investments made by WNH as well as the cost to operate and maintain the capital investments, along with a percentage for a return on equity. The impact to residential and small business (GS > 50 kW) customers for the 2021 proposed rates compared to the 2020 rates is:

Rate Class	kWh	Total Bill Impact	
		\$	%
Residential	750	0.97	0.8%
GS < 50 kW	2,000	(1.32)	-0.4%

WNH has a service area of 683 sq. km. that provides electricity distribution to approximately 58,000 residential, commercial and industrial customers. WNH is incorporated under the Ontario Business Corporations Act and is 100% municipally owned by the City of Waterloo, the Township of Woolwich and the Township of Wellesley.

The full Application includes information on the amount and location of capital investments being made in the service territory along with the costs to operate and maintain the system, produce bills, and provide customer support. WNH employs approximately 128 local staff. The full Application can be found on WNH's website ([www.wnhydro.com](http://www.wnhydro.com)).

Since WNH last rebased, WNH has achieved the following:

- Successful implementation of a new Customer Information System that has allowed for:

- 1 i) Fast and efficient implementation of billing changes
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- 3 iii) Improved customer web portal and My Account features

4

5 In addition, WNH plans to offer further upgrades to this system which would allow for  
6 added features such as:

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- 8 i) Better communication (Outage notifications, pro-active high bill alerts and  
9 payment reminders, campaigns around electrical safety)
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11 area)
- 12 iii) Summary billing (a single invoice for customers with multiple premises).

13

- 14 • Implemented its Outage Management System and a public facing Customer  
15 Outage Map to inform the public of outages and estimated time to restore.
- 16 • Implemented automatic self-healing network using automated switches to speed  
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- 18 • Introduced a risk based asset management software to improve asset health  
19 analytics and prioritization of capital expenditures.
- 20 • Continued grid modernization by enhancing its communication network and  
21 installing automated switches in the field to speed up outage restoration.
- 22 • From 2015-2017 WNH rerouted distribution plant along the Light Rail Transit (LRT)  
23 corridor.
- 24 • Implemented Government Initiatives such as the Fair Hydro Plan, Ontario Energy  
25 Rebate and COVID-19 Off-Peak Billing.
- 26 • Provided electrical safety education to local Emergency Response Teams,  
27 Contractors, Elementary Schools and the public.

1 WNH also won the following prestigious awards:

2

- 3 • Waterloo Region Top Employer – 2017, 2018, 2019, 2020
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- 6 • 2019 Gold Award in the Psychological Safety – Canada's Safest Employer
- 7 • 2019 Silver Award in the Utilities category – Canada's Safest Employer
- 8 • 2018 Greater Kitchener Waterloo Chamber of Commerce Health & Wellness in the
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10

11 In the coming years, WNH plans to:

12

- 13 • Continue its approach of proactive and consistent renewal to maintain system
- 14 performance while keeping bill impacts to customers manageable.
- 15 • Continue to invest in grid modernization in order to quickly restore power to as
- 16 many customers as possible.
- 17 • Continue to facilitate Distributed Energy Resources and Net Metering. Support
- 18 Virtual Net Metering when allowed by regulation.
- 19 • Replace WNH's 15-year-old Enterprise Resource Planning Software (ERP).
- 20 WNH's current ERP system, which was a mature product at the time of its
- 21 installation in 2005 is at end-of-life.

22

23 The Application that accumulates to the rate impacts noted above include a capital and  
24 operating plan for 2021. The total capital budget for 2021 is \$19.0 Million and the total  
25 operating budget for 2021 is \$16.2 Million. These capital expenditures allow WNH to:

26

- 27 • accommodate road construction
- 28 • connect new customers
- 29 • replace and refurbish aging poles, transformers and wires

- 1       • ensure a reliable supply of electricity
- 2       • monitor distribution system
- 3       • replace and refurbish aging buildings, trucks and tools as well as software systems

4

5       The operating budget allows WNH the ability to maintain systems and assets, provide  
6       tree trimming to assist in reducing outages, offer locate services to customers, provide  
7       accurate bills and responsive customer services, ensure that WNH is protected through  
8       cyber security and ensure that our staff is well trained on how to do their work safely and  
9       effectively.

10

11       In order to accomplish the items listed above, WNH requires annual revenues of  
12       \$39,298,087. Broken down by customer this is an increase of 1.5% for residential  
13       customers over 2020 rates and 1.3% for GS < 50 kW (small business) customers.

14

15       With the approval of this Rate Application, while costs will increase as indicated, WNH  
16       customers will continue to enjoy reliable service with minimal outages, will see improved  
17       customer portal options and will continue to have their needs met by WNH.

Re: Hydro Dis Rates - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Mon 7/27/2020 2:55 PM

To: [REDACTED]

Hello [REDACTED],

Thank you for your e-mail. The rate application that Waterloo North Hydro submitted to the Ontario Energy Board is effective January 1, 2021.

Should you have concerns, please review the notice which explains that you can file a letter with your comments, which will be considered during the hearing.

For your convenience, here is a link to the notice: [https://www.wnhydro.com/en/our-company/resources/Regulatory\\_Filings/2021-Rate-Application/Notice\\_Waterloo-North-Hydro\\_20200720.pdf](https://www.wnhydro.com/en/our-company/resources/Regulatory_Filings/2021-Rate-Application/Notice_Waterloo-North-Hydro_20200720.pdf)

If you have any questions, please contact us at 519-886-5090.

Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]

**Sent:** Thursday, July 23, 2020 2:51 PM

**To:** Regulatory Regulatory <regulatory@wnhydro.com>

**Subject:** Hydro Dis Rates - [EXTERNAL]

\*\*\* This is an EXTERNAL email. DO NOT open attachments, enable editing or macros, or click on links from unknown senders or in unexpected email \*\*\*

Hi! How do I express my concerns about Hydro Distribution rates?

[REDACTED]  
Sent from my iPad

Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Mon 7/27/2020 3:00 PM

To: [REDACTED]

📎 1 attachments (26 KB)

Waterlo-North-Hydro-2021-Rate-Application-Exhibit-1-Revised-Board-File-No-EB-2020-0059-Customer Summ.pdf;

Hello [REDACTED],

Thank you for your e-mail; we appreciate your comment. The rate application that Waterloo North Hydro submitted to the Ontario Energy Board is for the Delivery Charge that is on your bill effective January 1, 2021.

In Exhibit 1, there is a Customer Summary that will provide you details of the rate application. We have attached the excerpt from Exhibit 1 in this e-mail. We acknowledge that there is a great deal of information as this is a fairly complex process that is required by the Ontario Energy Board. If you would like further information or clarification, please reach out to us again by email [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com) or by phone at 519-886-5090.

Should you have concerns, please review the notice which explains that you can file a letter with your comments, which will be considered during the hearing.

For your convenience, here is a link to the notice: [https://www.wnhydro.com/en/our-company/resources/Regulatory\\_Filings/2021-Rate-Application/Notice\\_Waterloo-North-Hydro\\_20200720.pdf](https://www.wnhydro.com/en/our-company/resources/Regulatory_Filings/2021-Rate-Application/Notice_Waterloo-North-Hydro_20200720.pdf)

Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]

**Sent:** Thursday, July 23, 2020 3:10 PM

**To:** Regulatory Regulatory <regulatory@wnhydro.com>

**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

\*\*\* This is an EXTERNAL email. DO NOT open attachments, enable editing or macros, or click on links from unknown senders or in unexpected email \*\*\*

As a customer I have to say that this is most confusing. When I clicked on the link to find out how this will affect me it took me to another page with several more links and each link contained hundreds of

pages of documents that are not comprehensible to the general public. Honestly this is impossible to make sense of.

I would just like to know what is the proposed rate increase amount? As well as a brief synopsis as the reason for this increase. If you could provide something less complicated and straight to the point, that would be most appreciated.

thank you

On Thu, Jul 23, 2020 at 2:15 PM Waterloo North Hydro <[regulatory@wnhydro.com](mailto:regulatory@wnhydro.com)> wrote:



## Notice of Hearing

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Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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Sent by [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com) powered by



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Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of  
Regulatory Regulatory <regulatory@wnhydro.com>

Mon 7/27/2020 3:19 PM

To: [REDACTED]

📎 1 attachments (26 KB)

Waterlo-North-Hydro-2021-Rate-Application-Exhibit-1-Revised-Board-File-No-EB-2020-0059-Customer Summ.pdf;

Hello [REDACTED],

Thank you for your e-mail. The rate application that Waterloo North Hydro submitted to the Ontario Energy Board is for the Delivery Charge that is on your bill effective January 1, 2021.

In Exhibit 1, there is a Customer Summary that will provide you details of the rate application. We have attached the excerpt from Exhibit 1 in this e-mail.

Should you have concerns, please review the notice which explains that you can file a letter with your comments, which will be considered during the hearing.

For your convenience, here is a link to the notice: [https://www.wnhydro.com/en/our-company/resources/Regulatory\\_Filings/2021-Rate-Application/Notice\\_Waterloo-North-Hydro\\_20200720.pdf](https://www.wnhydro.com/en/our-company/resources/Regulatory_Filings/2021-Rate-Application/Notice_Waterloo-North-Hydro_20200720.pdf)

If you have any questions, please contact us at 519-886-5090.

Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]  
**Sent:** Monday, July 27, 2020 8:25 AM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** FW: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

\*\*\* This is an EXTERNAL email. DO NOT open attachments, enable editing or macros, or click on links from unknown senders or in unexpected email \*\*\*

Good morning,

What is this for?

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** July 27, 2020 7:39 AM  
**To:** [REDACTED]  
**Subject:** FW: Waterloo North Hydro: Notice of Hearing

Can you find out what this is all about

---

**From:** Waterloo North Hydro <[regulatory@wnhydro.com](mailto:regulatory@wnhydro.com)>  
**Sent:** July 23, 2020 2:16 PM  
**To:** [REDACTED]  
**Subject:** Waterloo North Hydro: Notice of Hearing

\_\_\_\_\_

\_\_\_\_\_

□

## Notice of Hearing

Dear Valued Customer:

Waterloo North Hydro Inc. has applied to the Ontario Energy Board to increase our electricity distribution rates. Please review the Ontario Energy Board's [Notice of Hearing](#) to learn more and to find out how you can participate in the Ontario Energy Board's hearing.



To view the full Rate Application, please click [here](#) or visit [www.wnhydro.com/rateapplication](http://www.wnhydro.com/rateapplication).

To contact us, please call our Regulatory Affairs team at 519-886-5090 weekdays between 8:30 am and 4:30 pm or reach us by email at [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com).

Thank You,

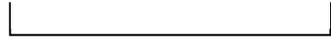
Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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Sent by [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com) powered by



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### 2.1.3 CUSTOMER SUMMARY

Waterloo North Hydro (WNH) has applied to the Ontario Energy Board for a change in the distribution rates that it charges its customers. The distribution rates are based on the amount of capital investments made by WNH as well as the cost to operate and maintain the capital investments, along with a percentage for a return on equity. The impact to residential and small business (GS > 50 kW) customers for the 2021 proposed rates compared to the 2020 rates is:

Rate Class	kWh	Total Bill Impact	
		\$	%
Residential	750	0.97	0.8%
GS < 50 kW	2,000	(1.32)	-0.4%

WNH has a service area of 683 sq. km. that provides electricity distribution to approximately 58,000 residential, commercial and industrial customers. WNH is incorporated under the Ontario Business Corporations Act and is 100% municipally owned by the City of Waterloo, the Township of Woolwich and the Township of Wellesley.

The full Application includes information on the amount and location of capital investments being made in the service territory along with the costs to operate and maintain the system, produce bills, and provide customer support. WNH employs approximately 128 local staff. The full Application can be found on WNH's website ([www.wnhydro.com](http://www.wnhydro.com)).

Since WNH last rebased, WNH has achieved the following:

- Successful implementation of a new Customer Information System that has allowed for:

- 1 i) Fast and efficient implementation of billing changes
- 2 ii) Easy customer online access to billing and consumption data
- 3 iii) Improved customer web portal and My Account features

4

5 In addition, WNH plans to offer further upgrades to this system which would allow for  
6 added features such as:

7

- 8 i) Better communication (Outage notifications, pro-active high bill alerts and  
9 payment reminders, campaigns around electrical safety)
- 10 ii) Self-service online (interactive website, online chat, comparing usage with  
11 area)
- 12 iii) Summary billing (a single invoice for customers with multiple premises).

13

- 14 • Implemented its Outage Management System and a public facing Customer  
15 Outage Map to inform the public of outages and estimated time to restore.
- 16 • Implemented automatic self-healing network using automated switches to speed  
17 up outage restoration.
- 18 • Introduced a risk based asset management software to improve asset health  
19 analytics and prioritization of capital expenditures.
- 20 • Continued grid modernization by enhancing its communication network and  
21 installing automated switches in the field to speed up outage restoration.
- 22 • From 2015-2017 WNH rerouted distribution plant along the Light Rail Transit (LRT)  
23 corridor.
- 24 • Implemented Government Initiatives such as the Fair Hydro Plan, Ontario Energy  
25 Rebate and COVID-19 Off-Peak Billing.
- 26 • Provided electrical safety education to local Emergency Response Teams,  
27 Contractors, Elementary Schools and the public.

1 WNH also won the following prestigious awards:

2

- 3 • Waterloo Region Top Employer – 2017, 2018, 2019, 2020
- 4 • Electrical Safety Authority Consumer and Home Safety Award 2017 and 2019
- 5 • Region of Waterloo's Platinum Healthy Workplace Award – 2015, 2016, 2017
- 6 • 2019 Gold Award in the Psychological Safety – Canada's Safest Employer
- 7 • 2019 Silver Award in the Utilities category – Canada's Safest Employer
- 8 • 2018 Greater Kitchener Waterloo Chamber of Commerce Health & Wellness in the
- 9 Workplace Award

10

11 In the coming years, WNH plans to:

12

- 13 • Continue its approach of proactive and consistent renewal to maintain system
- 14 performance while keeping bill impacts to customers manageable.
- 15 • Continue to invest in grid modernization in order to quickly restore power to as
- 16 many customers as possible.
- 17 • Continue to facilitate Distributed Energy Resources and Net Metering. Support
- 18 Virtual Net Metering when allowed by regulation.
- 19 • Replace WNH's 15-year-old Enterprise Resource Planning Software (ERP).
- 20 WNH's current ERP system, which was a mature product at the time of its
- 21 installation in 2005 is at end-of-life.

22

23 The Application that accumulates to the rate impacts noted above include a capital and  
24 operating plan for 2021. The total capital budget for 2021 is \$19.0 Million and the total  
25 operating budget for 2021 is \$16.2 Million. These capital expenditures allow WNH to:

26

- 27 • accommodate road construction
- 28 • connect new customers
- 29 • replace and refurbish aging poles, transformers and wires

- 1       • ensure a reliable supply of electricity
- 2       • monitor distribution system
- 3       • replace and refurbish aging buildings, trucks and tools as well as software systems

4

5       The operating budget allows WNH the ability to maintain systems and assets, provide  
6       tree trimming to assist in reducing outages, offer locate services to customers, provide  
7       accurate bills and responsive customer services, ensure that WNH is protected through  
8       cyber security and ensure that our staff is well trained on how to do their work safely and  
9       effectively.

10

11       In order to accomplish the items listed above, WNH requires annual revenues of  
12       \$39,298,087. Broken down by customer this is an increase of 1.5% for residential  
13       customers over 2020 rates and 1.3% for GS < 50 kW (small business) customers.

14

15       With the approval of this Rate Application, while costs will increase as indicated, WNH  
16       customers will continue to enjoy reliable service with minimal outages, will see improved  
17       customer portal options and will continue to have their needs met by WNH.

Re: Waterloo Hydro rate hike - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Mon 7/27/2020 4:42 PM

To: [REDACTED]

📎 1 attachments (26 KB)

Waterlo-North-Hydro-2021-Rate-Application-Exhibit-1-Revised-Board-File-No-EB-2020-0059-Customer Summ.pdf;

Hello [REDACTED],

Thank you for your e-mail; we understand your concern. The rate application that Waterloo North Hydro submitted to the Ontario Energy Board is for the Delivery Charge that is on your bill effective January 1, 2021. Waterloo North Hydro completes this type of filing once every five years and the process to prepare this application began in early 2019.

The rates you are referring to are Time-of-Use (TOU) rates set by the Province of Ontario. Waterloo North Hydro does not mark up the cost of electricity (TOU); what customers pay to us is paid directly to the Independent Electricity System Operator (IESO) who is responsible for operating the electricity market.

In Exhibit 1, there is a Customer Summary that will provide you details of the rate application. We have attached the excerpt from Exhibit 1 in this e-mail.

Should you have further concerns, please review the notice which explains that you can file a letter with your comments, which will be considered during the hearing.

For your convenience, here is a link to the notice: [https://www.wnhydro.com/en/our-company/resources/Regulatory\\_Filings/2021-Rate-Application/Notice\\_Waterloo-North-Hydro\\_20200720.pdf](https://www.wnhydro.com/en/our-company/resources/Regulatory_Filings/2021-Rate-Application/Notice_Waterloo-North-Hydro_20200720.pdf)

If you have any questions, please contact us at 519-886-5090.

Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]

**Sent:** Friday, July 24, 2020 1:32 PM

**To:** Regulatory Regulatory <regulatory@wnhydro.com>

**Subject:** Waterloo Hydro rate hike - [EXTERNAL]

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We read the notice with alarm, and frankly disturbing.

Why has the Province given Hydro the go-ahead to cancel time-of-day rates prices (set at 12.8cents for

entire days use) and now wanting another bump to the rates going forward!

This is gouging!

We have just learned workers will continue to work from home, due to Covid concerns. Is this rate increase proposal being fare?

Sent from my iPhone

Re: Rates - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Tue 7/28/2020 8:29 AM

To: [REDACTED]

Hello [REDACTED],

Thank you for your e-mail; we understand your concern. The rate application that Waterloo North Hydro submitted to the Ontario Energy Board is for the Delivery Charge that is on your bill effective January 1, 2021.

Should you have further concerns, please review the notice which explains that you can file a letter with your comments, which will be considered during the hearing.

For your convenience, here is a link to the notice: [https://www.wnhydro.com/en/our-company/resources/Regulatory\\_Filings/2021-Rate-Application/Notice\\_Waterloo-North-Hydro\\_20200720.pdf](https://www.wnhydro.com/en/our-company/resources/Regulatory_Filings/2021-Rate-Application/Notice_Waterloo-North-Hydro_20200720.pdf)

In addition, effective July 13, 2020, the Government of Ontario confirmed that it is making funds available for the COVID-19 Energy Assistance Program (CEAP), to support residential customers struggling to pay their energy bills as a result of the COVID-19 emergency through its utility. CEAP provides a one time, on-bill credit to eligible residential electricity customers to help them catch up on their energy bills and resume regular payments. Customers need to meet the eligibility criteria to receive the credit.

To learn more or to apply, please visit <https://www.wnhydro.com/en/your-home/covid-19-emergency-assistance-program.asp>

If you have any questions, please contact us at 519-886-5090.

Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]

**Sent:** Thursday, July 23, 2020 2:41 PM

**To:** Regulatory Regulatory <regulatory@wnhydro.com>

**Subject:** Rates - [EXTERNAL]

\*\*\* This is an EXTERNAL email. DO NOT open attachments, enable editing or macros, or click on links from unknown senders or in unexpected email \*\*\*

This is crazy and should not be allowed . We already are struggling to make ends Meet due to covid in some cases out of work . It is shame full that you keep raising rates period . The transport of the hydro in most cases is more than the hydro used . Wake up I am against this completely

[REDACTED]

Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of  
Regulatory Regulatory <regulatory@wnhydro.com>

Tue 7/28/2020 3:31 PM

To: [REDACTED]

📎 1 attachments (453 KB)

Notice\_Waterloo North Hydro\_20200720.pdf;

Hello [REDACTED],

We apologize for the inconvenience.

Here is a link to the notice: [https://www.wnhydro.com/en/our-company/resources/Regulatory\\_Filings/2021-Rate-Application/Notice\\_Waterloo-North-Hydro\\_20200720.pdf](https://www.wnhydro.com/en/our-company/resources/Regulatory_Filings/2021-Rate-Application/Notice_Waterloo-North-Hydro_20200720.pdf)

I have also attached the PDF to this e-mail.

If you have any questions, please contact us at 519-886-5090 or reach us by e-mail at [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com).

Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]  
**Sent:** Monday, July 27, 2020 9:13 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

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the link was blocked by my ad blocker. Can you please host your information on a domain that has not been blacklisted?

On Thu, Jul 23, 2020 at 2:15 PM Waterloo North Hydro <[regulatory@wnhydro.com](mailto:regulatory@wnhydro.com)> wrote:

## Notice of Hearing

Dear Valued Customer:

Waterloo North Hydro Inc. has applied to the Ontario Energy Board to increase our electricity distribution rates. Please review the Ontario Energy Board's **Notice of Hearing** to learn more and to find out how you can participate in the Ontario Energy Board's hearing.

To view the full Rate Application, please click [here](#) or visit [www.wnhydro.com/rateapplication](http://www.wnhydro.com/rateapplication).

To contact us, please call our Regulatory Affairs team at 519-886-5090 weekdays between 8:30 am and 4:30 pm or reach us by email at [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com).

Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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# ONTARIO ENERGY BOARD NOTICE TO CUSTOMERS OF WATERLOO NORTH HYDRO INC.

## Waterloo North Hydro Inc. has applied to raise its electricity distribution rates and other charges.

### Learn more. Have your say.

**Waterloo North Hydro Inc. has applied to the Ontario Energy Board to raise its electricity distribution rates effective January 1, 2021. If the application is approved as filed, a typical residential customer and a typical general service customer of Waterloo North Hydro would see the following increases:**

<b>Residential (750 kWh)</b>	<b>\$0.70 per month</b>
<b>General Service less than 50 kW (2,000 kWh)</b>	<b>\$4.81 per month</b>

**Other customers may also be affected.**

**Waterloo North Hydro Inc. has also applied for approval to:**

- **change four Specific Services Charges, related to providing reconnection at meter and reconnection at pole/transformer – during and after regular hours**
- **establish new standby charges for the General Service 50 kW to 4,999 kW and Large Use customer classes**
- **charge current and future General Service 50 kW to 4,999 kW and Large Use customers who have load displacement generation, on a gross load billing basis**

**It is important to review the application carefully to determine whether you may be affected by these changes.**

### THE ONTARIO ENERGY BOARD IS HOLDING A PUBLIC HEARING

The Ontario Energy Board (OEB) will hold a public hearing to consider the application filed by Waterloo North Hydro. At the end of this hearing, the OEB will decide what, if any, rate increase will be allowed.

Distributors such as Waterloo North Hydro typically apply for a full review of their rates every five years. Any rate changes for the years in between are made by applying an OEB-approved formula which is tied to inflation and other factors intended to promote efficiency. You may not get notice of future rate changes made by applying the formula.

The OEB is an independent and impartial public agency. We make decisions that serve the public interest. Our goal is to promote a financially viable and efficient energy sector that provides you with reliable energy services at a reasonable cost.

### BE INFORMED AND HAVE YOUR SAY

You have the right to information regarding this application and to be involved in the process.

- You can review Waterloo North Hydro's application on the OEB's website now.
- You can file a letter with your comments, which will be considered during the hearing.
- You can become an active participant (called an intervenor). As an intervenor, you can ask questions about Waterloo North Hydro's application and make arguments on whether the OEB should approve Waterloo North Hydro's request. Apply by **August 10, 2020** or the hearing will go ahead without you and you will not receive any further notice of the proceeding.
- At the end of the process, you can review the OEB's decision and its reasons on our website.

### LEARN MORE

These proposed charges relate to Waterloo North Hydro's distribution services. They make up part of the Delivery line - one of the line items on your bill. Our file number for this case is **EB-2020-0059**. To learn more about this hearing, find instructions on how to file letters or become an intervenor, or to access any document related to this case, please select the file number **EB-2020-0059** from the list on the OEB website: [www.oeb.ca/notice](http://www.oeb.ca/notice). You can also phone our Consumer Relations Centre at 1-877-632-2727 with any questions.

### ORAL VS. WRITTEN HEARINGS

There are two types of OEB hearings – oral and written. Waterloo North Hydro has applied for a written hearing. The OEB will determine at a later date whether to proceed by way of a written or oral hearing. If you think an oral hearing is needed, you can write to the OEB to explain why by **August 10, 2020**.

### PRIVACY

*If you write a letter of comment, your name and the content of your letter will be put on the public record and the OEB website. However, your personal telephone number, home address and email address will be removed. If you are a business, all your information will remain public. If you apply to become an intervenor, all information will be public.*

*This rate hearing will be held under section 78 of the Ontario Energy Board Act, 1998, S.O. 1998 c.15 (Schedule B).*



Ontario

Ontario Energy Board / Commission de l'énergie de l'Ontario

Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 8:50 AM

To: [REDACTED]

Dear Customer:

Thank you for your email regarding Waterloo North Hydro's (WNH) proposed rate application. We respect your opinion and would like to provide some additional information.

WNH is applying for an increase on the distribution rate which is the amount charged by utilities to maintain and operate local electricity systems. The rate is a separate charge from the cost of the electricity and represents slightly over one-quarter of your bill.

This portion of your bill is used to maintain a safe and reliable electricity system. It is used for new connections, road relocations and to service, rebuild and upgrade transformers, poles and wires. A significant portion of our system was installed in the 1960s and 1970s and these upgrades combined with our smart grid technology ensure a more reliable system and allow us to respond faster to outages.

WNH has applied to the Ontario Energy Board (OEB) for a 2.2% distribution rate increase beginning January 1. If the application is approved, it will mean a monthly increase of \$.70 for the average residential customer using 750 kWh a month. The last application for a rate increase was five years ago.

The OEB's rate hearing process allows anyone to participate including customers and businesses. Expert intervenors, acting on behalf of consumers, will challenge the specifics of WNH's application. A final decision on the application is expected by the end of the year.

We understand the impact this may have during the COVID-19 pandemic. Waterloo North Hydro has taken several steps to assist our customers who may be facing financial challenges. We are not disconnecting residential and small business customers for non-payment and working with them to develop payment plans that suit their financial situation.

In addition, the provincial government is making funds available through WNH for the COVID-19 Energy Assistance Program (CEAP) to help residential customers pay their energy bills. CEAP provides a one-time credit to eligible residential electricity customers to help them catch up on their energy bills and resume regular payments.

To learn more or to apply, please visit [https://www.wnhydro.com/ceap\\_](https://www.wnhydro.com/ceap_)

Thank you again for your comments and please contact us again should you have questions or concerns.

Regulatory Team  
Waterloo North Hydro Inc.

---

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**Sent:** Thursday, July 23, 2020 2:24 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

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Don't you make enough money without gouging customers constantly with increase in rates!



Virus-free. [www.avg.com](http://www.avg.com)

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To view the full Rate Application, please click [here](#) or visit [www.wnhydro.com/rateapplication](http://www.wnhydro.com/rateapplication).

To contact us, please call our Regulatory Affairs team at 519-886-5090 weekdays between 8:30 am and 4:30 pm or reach us by email at [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com).

Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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Sent by [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com) powered by



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Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 8:54 AM

To: [REDACTED]

Dear Customer:

Thank you for your email regarding Waterloo North Hydro's (WNH) proposed rate application. We respect your opinion and would like to provide some additional information.

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This portion of your bill is used to maintain a safe and reliable electricity system. It is used for new connections, road relocations and to service, rebuild and upgrade transformers, poles and wires. A significant portion of our system was installed in the 1960s and 1970s and these upgrades combined with our smart grid technology ensure a more reliable system and allow us to respond faster to outages.

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To learn more or to apply, please visit [https://www.wnhydro.com/ceap\\_](https://www.wnhydro.com/ceap_)

Thank you again for your comments and please contact us again should you have questions or concerns.

Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]  
**Sent:** Thursday, July 23, 2020 2:25 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

\*\*\* This is an EXTERNAL email. DO NOT open attachments, enable editing or macros, or click on links from unknown senders or in unexpected email \*\*\*

Cause you dont charge enough now. Greedy.

On Jul. 23, 2020 2:15 p.m., Waterloo North Hydro <regulatory@wnhydro.com> wrote:



## Notice of Hearing

Dear Valued Customer:

Waterloo North Hydro Inc. has applied to the Ontario Energy Board to increase our electricity distribution rates. Please review the Ontario Energy Board's **Notice of Hearing** to learn more and to find out how you can participate in the Ontario Energy Board's hearing.

ONTARIO ENERGY BOARD NOTICE  
TO CUSTOMERS OF WATERLOO NORTH HYDRO INC.

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**Learn more. Have your say.**

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To contact us, please call our Regulatory Affairs team at 519-886-5090 weekdays between 8:30 am and 4:30 pm or reach us by email at [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com).

Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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Re: Application and hearing to increase our electricity distributionrates - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:00 AM

To: [REDACTED]

Hello [REDACTED]:

Thank you for your email regarding Waterloo North Hydro's (WNH) proposed rate application effective January 1, 2021. We respect your opinion and would like to provide some additional information.

WNH is applying for an increase on the distribution rate which is the amount charged by utilities to maintain and operate local electricity systems. The rate is a separate charge from the cost of the electricity.

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Thank you again for your comments and please contact us again should you have questions or concerns.

Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]

**Sent:** Thursday, July 23, 2020 2:31 PM

**To:** Regulatory Regulatory <regulatory@wnhydro.com>

**Subject:** Application and hearing to increase our electricity distributionrates - [EXTERNAL]

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Hello,

This is terrible timing. Businesses are having a huge amount of trouble paying the rates we're paying as it is. Also, who is going to any hearings these days.

I don't actually know why I'm writing this, because I know it won't help anything.

This is totally tone deaf and unbelievable.



This EXTERNAL email has been processed by Glasswall. Forward email WITH ATTACHMENTS to [isbackups@WNHydro.com](mailto:isbackups@WNHydro.com) to request release if files were quarantined or were sanitised and have data missing.

Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:05 AM

To: [REDACTED]

Cc: [REDACTED]

Dear [REDACTED]:

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**From:** [REDACTED]  
**Sent:** Thursday, July 23, 2020 2:33 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

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I'm sure the seniors and less fortunate will welcome this news... Please send out a list at year end showing the number of hydro employees who receive a bonus equal or greater than \$100,000 you greedy peices of shit.  
[REDACTED]

On Jul 23, 2020 14:15, Waterloo North Hydro <regulatory@wnhydro.com> wrote:



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Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:13 AM

To: [REDACTED]

Dear Customer:

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Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]  
**Sent:** Thursday, July 23, 2020 2:30 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

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Why would anyone expect nothing else from a bunch of crooks

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Thank You,

Waterloo North Hydro

Waterloo North Hydro | [526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada](#)

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Sent by [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com) powered by

Re: Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:15 AM

To: [REDACTED]

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Regulatory Team  
Waterloo North Hydro Inc.

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**From:** [REDACTED]  
**Sent:** Thursday, July 23, 2020 2:45 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** Hearing - [EXTERNAL]

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Yeah we already have enough troubles with your glitchy systems giving the wrong bill amounts and rates already through the roof.

Don't you make enough money?  
Greedy mf.

Get [Outlook for Android](#)

Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:16 AM

To: [REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, July 23, 2020 2:48 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
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Hilarious!

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Maybe take the valued part out lol!

Sent from my iPhone

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To contact us, please call our Regulatory Affairs team at 519-886-5090 weekdays between 8:30 am and 4:30 pm or reach us by email at [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com).

Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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Sent by [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com) powered by



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Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:19 AM

To: [REDACTED]

Dear Customer:

Thank you for your email regarding Waterloo North Hydro's (WNH) proposed rate application effective January 1, 2021. We respect your opinion and would like to provide some additional information.

WNH is applying for an increase on the distribution rate which is the amount charged by utilities to maintain and operate local electricity systems. The rate is a separate charge from the cost of the electricity.

This portion of your bill is used to maintain a safe and reliable electricity system. It is used for new connections, road relocations and to service, rebuild and upgrade transformers, poles and wires. A significant portion of our system was installed in the 1960s and 1970s and these upgrades combined with our smart grid technology ensure a more reliable system and allow us to respond faster to outages.

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Thank you again for your comments and please contact us again should you have questions or concerns.

Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]

**Sent:** Thursday, July 23, 2020 2:50 PM

**To:** Regulatory Regulatory <regulatory@wnhydro.com>; [REDACTED]  
[REDACTED]

**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

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or click on links from unknown senders or in unexpected email \*\*\*

How is this possible

Everyone else in this climate has to adjust with less and this over charging service gets away with this ??



On Thursday, July 23, 2020, 2:15:40 p.m. EDT, Waterloo North Hydro <regulatory@wnhydro.com> wrote:



## Notice of Hearing

Dear Valued Customer:

Waterloo North Hydro Inc. has applied to the Ontario Energy Board to increase our electricity distribution rates. Please review the Ontario Energy Board's **Notice of Hearing** to learn more and to find out how you can participate in the Ontario Energy Board's hearing.

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**Learn more. Have your say.**

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It is important to review the application carefully to determine whether you may be affected by these changes.

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**BE INFORMED AND HAVE YOUR SAY**

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Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:21 AM

To: [REDACTED]

Dear Customer:

Thank you for your email regarding Waterloo North Hydro's (WNH) proposed rate application. We respect your opinion and would like to provide some additional information.

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Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]  
**Sent:** Thursday, July 23, 2020 3:07 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

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Fuck you and raise our rates...

Sent from my iPhone

On Jul 23, 2020, at 2:15 PM, Waterloo North Hydro <regulatory@wnhydro.com> wrote:



## Notice of Hearing

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Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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Sent by [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com) powered by



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Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:22 AM

To: [REDACTED]

Dear Customer:

Thank you for your email regarding Waterloo North Hydro's (WNH) proposed rate application. We respect your opinion and would like to provide some additional information.

WNH is applying for an increase on the distribution rate which is the amount charged by utilities to maintain and operate local electricity systems. The rate is a separate charge from the cost of the electricity and represents slightly over one-quarter of your bill.

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Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]  
**Sent:** Thursday, July 23, 2020 3:12 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

\*\*\* This is an EXTERNAL email. DO NOT open attachments, enable editing or macros, or click on links from unknown senders or in unexpected email \*\*\*

Hello,

Thank you for this notice.

We just received our recent hydro bill and it was about \$50 more than our last bill. This is most likely due to the fact that we have been using the air conditioner more. I work at home so I have to be comfortable. Sometimes I try to only run a small fan, but if it is too humid out, I tend to get headaches and need the air. I also run my laptop and turn on my printer occasionally and use a scanner. I have also been doing some laundry during the day as I understand that Time of Use rates have been eliminated until the end of October 2020.

I compared our July 2020 bill to our July 2019 one and noticed that our rates have doubled since this time last year. Therefore, I do not agree with an increase in our electricity distribution rates. This is a bad time to be requesting such an increase with some people out of work and not even knowing if they have a job. I am fortunate to work at home, but my husband lost many days of work and is only starting to get back to anything close to normal. We have been spending more on groceries, PPE and many other expenses so do not appreciate seeing a further increase in our hydro bill.

I hope that you will reconsider.

Sincerely,

On Thu, Jul 23, 2020 at 2:15 PM Waterloo North Hydro <[regulatory@wnhydro.com](mailto:regulatory@wnhydro.com)> wrote:



## Notice of Hearing

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Ontario  
Ontario Energy Board / Commission de l'énergie  
de l'Ontario

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Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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**Re: Application to Increase Rates - [EXTERNAL]**

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:24 AM

To: [REDACTED]

Dear [REDACTED]:

Thank you for your email regarding Waterloo North Hydro's (WNH) proposed rate application effective January 1, 2021. We respect your opinion and would like to provide some additional information.

WNH is applying for an increase on the distribution rate which is the amount charged by utilities to maintain and operate local electricity systems. The rate is a separate charge from the cost of the electricity.

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Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]  
**Sent:** Thursday, July 23, 2020 3:22 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** Application to Increase Rates - [EXTERNAL]

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Dear Waterloo North Hydro,

I was very disappointed to see that you are applying to increase your rates. This news comes at a time when many people in the community have been unemployed since March and struggling to keep up with living costs. Many small businesses, including my own, were forced to continue paying utility costs while being closed for three months and being allowed to reopen with diminished capacity. During this difficult time, there was no support from Waterloo North Hydro. To increase rates now, even on top of the astronomical "delivery charges," is in very bad taste. I would strongly urge you to reconsider your "application" at this time.

Sincerely,

A solid black rectangular box used to redact the sender's name and signature.

Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:27 AM

To: [REDACTED]

Dear Customer:

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Waterloo North Hydro Inc.

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**From:** [REDACTED]  
**Sent:** Thursday, July 23, 2020 3:38 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

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Rates are already too high!

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Thank You,

Waterloo North Hydro

Waterloo North Hydro | [526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada](#)

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Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:28 AM

To: [REDACTED]

Dear [REDACTED],

Thank you for your email regarding Waterloo North Hydro's (WNH) proposed rate application. We respect your opinion and would like to provide some additional information.

WNH is applying for an increase on the distribution rate which is the amount charged by utilities to maintain and operate local electricity systems. The rate is a separate charge from the cost of the electricity and represents slightly over one-quarter of your bill.

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Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]  
**Sent:** Friday, July 24, 2020 8:14 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** RE: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

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You dirty filthy money grubbing bastards. Covid times with mental and financial stress in unheralded times .

You absolutely disgust me on a human level. You filthy money grubbing pieces of money grabbers.

Shame shame .

Shake my head in disgust.

Dirty dirty bastards.

[REDACTED]

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: Waterloo North Hydro <regulatory@wnhydro.com>  
Date: 2020-07-23 2:15 p.m. (GMT-05:00)  
To: beckblaine@yahoo.com  
Subject: Waterloo North Hydro: Notice of Hearing



## Notice of Hearing

Dear Valued Customer:

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Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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Re: Hydro increase - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:29 AM

To: [REDACTED]

Dear Customer:

Thank you for your email regarding Waterloo North Hydro's (WNH) proposed rate application. We respect your opinion and would like to provide some additional information.

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To learn more or to apply, please visit [https://www.wnhydro.com/ceap\\_](https://www.wnhydro.com/ceap_)

Thank you again for your comments and please contact us again should you have questions or concerns.

Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]  
**Sent:** Thursday, July 23, 2020 4:56 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** Hydro increase - [EXTERNAL]

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I do not think Waterloo North hydro requires a hike in the rates especially during Covid !

[REDACTED]

Sent from my iPhone

Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:31 AM

To: [REDACTED]

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Waterloo North Hydro Inc.

---

**From:** [REDACTED]  
**Sent:** Thursday, July 23, 2020 5:34 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

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This is bullship time to move out of Waterloo

On Thu, Jul 23, 2020, 2:15 PM Waterloo North Hydro <[regulatory@wnhydro.com](mailto:regulatory@wnhydro.com)> wrote:



## Notice of Hearing

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Thank You,

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Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:33 AM

To: [REDACTED]

Dear [REDACTED],

Thank you for your email regarding Waterloo North Hydro's (WNH) proposed rate application. We respect your opinion and would like to provide some additional information.

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Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]

**Sent:** Thursday, July 23, 2020 6:28 PM

**To:** Regulatory Regulatory <regulatory@wnhydro.com>; [REDACTED]

**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

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Dear [REDACTED],

it is common knowledge that Ontario is paying one of the highest Hydro Rates in the World.

Action should be taken by the government that the privatization if parts if the Hydro Providers goes back into Government Hands that the gouging to the public will stop.

As it was back in the 80th.

We sit in one room have all LED lights and run on Geothermal Heating and we pay through the nose.

We have the ugly feeling that those smart meters get rigged. As it always shows a high usage which is very strange.

Many people now have to choose to have bread on the table to fork out the needed money to pay the exuberant Hydro Bills and they are gouging for more and more.

Please have this addressed as our Premier that like Quebec, we get a normal Hydro Rates.

Friends did visit us from there and we showed them our bills and they almost dropped dead, telling us they have never seen such exuberant rates.

Please Help to get prices back to normal here in Ontario.

Kind Regards,

[REDACTED]

On behalf of many neighbours and friends

On Thursday, July 23, 2020, 02:15:39 PM EDT, Waterloo North Hydro <regulatory@wnhydro.com> wrote:



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Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:34 AM

To: [REDACTED]

Dear Customer:

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Thank you again for your comments and please contact us again should you have questions or concerns.

Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]  
**Sent:** Thursday, July 23, 2020 7:02 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

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No

On Thu., Jul. 23, 2020, 2:15 p.m. Waterloo North Hydro, <[regulatory@wnhydro.com](mailto:regulatory@wnhydro.com)> wrote:



## Notice of Hearing

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Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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Sent by [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com) powered by



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Re: Kick Us While We Are Down! - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:35 AM

To: [REDACTED]

Dear Customer:

Thank you for your email regarding Waterloo North Hydro's (WNH) proposed rate application. We respect your opinion and would like to provide some additional information.

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Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]  
**Sent:** Thursday, July 23, 2020 7:32 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** Kick Us While We Are Down! - [EXTERNAL]

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Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:36 AM

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**From:** [REDACTED]  
**Sent:** Thursday, July 23, 2020 10:08 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

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no thank you

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Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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Sent by [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com) powered by



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Re: Bull crap rate hike - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:36 AM

To: [REDACTED]

Dear Customer:

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Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]  
**Sent:** Thursday, July 23, 2020 10:16 PM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** Bull crap rate hike - [EXTERNAL]

\*\*\* This is an EXTERNAL email. DO NOT open attachments, enable editing or macros, or click on links from unknown senders or in unexpected email \*\*\*

Give me a break. You are trying to raise rates because of revenue loss due to Covid so you are trying to recupe the loss by unfairly raising rates on residential consumers.

Re: WHAT!!! You want to increase our hydro rates in the middle of a pandemic? -  
[EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:37 AM

To: [REDACTED]

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Regulatory Team

Waterloo North Hydro Inc.

---

**From:** [REDACTED]

**Sent:** Thursday, July 23, 2020 11:22 PM

**To:** Regulatory Regulatory <regulatory@wnhydro.com>

**Subject:** WHAT!!! You want to increase our hydro rates in the middle of a pandemic? - [EXTERNAL]

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Are you crazy!! People are hurting, we are in the middle of the pandemic and it's going to get worse over the winter. If you raise the rates, you are a shit hole company. I used to be proud of the way you handled business, now I'm disgusted.

Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

[REDACTED]  
on behalf of

Regulatory Regulatory <regulatory@wnhydro.com>

Fri 7/31/2020 9:38 AM

To: [REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, July 24, 2020 1:22 AM  
**To:** Regulatory Regulatory <regulatory@wnhydro.com>  
**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

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why dont you try doing the same using less like everyone else... paycuts, layoffs ... everybody sees what is going on

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Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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[REDACTED]  
on behalf of

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Fri 7/31/2020 9:39 AM

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WNH is applying for an increase on the distribution rate which is the amount charged by utilities to maintain and operate local electricity systems. The rate is a separate charge from the cost of the electricity and represents slightly over one-quarter of your bill.

This portion of your bill is used to maintain a safe and reliable electricity system. It is used for new connections, road relocations and to service, rebuild and upgrade transformers, poles and wires. A significant portion of our system was installed in the 1960s and 1970s and these upgrades combined with our smart grid technology ensure a more reliable system and allow us to respond faster to outages.

WNH has applied to the Ontario Energy Board (OEB) for a 2.2% distribution rate increase beginning January 1. If the application is approved, it will mean a monthly increase of \$.70 for the average residential customer using 750 kWh a month. The last application for a rate increase was five years ago.

The OEB's rate hearing process allows anyone to participate including customers and businesses. Expert intervenors, acting on behalf of consumers, will challenge the specifics of WNH's application. A final decision on the application is expected by the end of the year.

We understand the impact this may have during the COVID-19 pandemic. Waterloo North Hydro has taken several steps to assist our customers who may be facing financial challenges. We are not disconnecting residential and small business customers for non-payment and working with them to develop payment plans that suit their financial situation.

In addition, the provincial government is making funds available through WNH for the COVID-19 Energy Assistance Program (CEAP) to help residential customers pay their energy bills. CEAP provides a one-time credit to eligible residential electricity customers to help them catch up on their energy bills and resume regular payments.

To learn more or to apply, please visit [https://www.wnhydro.com/ceap\\_](https://www.wnhydro.com/ceap_)

Thank you again for your comments and please contact us again should you have questions or concerns.

Regulatory Team  
Waterloo North Hydro Inc.

---

**From:** [REDACTED]

**Sent:** Friday, July 24, 2020 11:28 AM

**To:** Regulatory Regulatory <regulatory@wnhydro.com>

**Cc:** [REDACTED]

**Subject:** Re: Waterloo North Hydro: Notice of Hearing - [EXTERNAL]

\*\*\* This is an EXTERNAL email. DO NOT open attachments, enable editing or macros, or click on links from unknown senders or in unexpected email \*\*\*

Dear Waterloo Nth Hydro, this is neither the time or economy to be raising electricity rates in our region.

Please rethink your application at this time.

Sincerely [REDACTED]

Sent from my iPhone

On Jul 23, 2020, at 2:15 PM, Waterloo North Hydro <regulatory@wnhydro.com> wrote:



## Notice of Hearing

Dear Valued Customer:

Waterloo North Hydro Inc. has applied to the Ontario Energy Board to increase our electricity distribution rates. Please review the Ontario Energy Board's **Notice of Hearing** to learn more and to find out how you can participate in the Ontario Energy Board's hearing.

ONTARIO ENERGY BOARD NOTICE  
TO CUSTOMERS OF WATERLOO NORTH HYDRO INC.

**Waterloo North Hydro Inc. has applied to raise its electricity distribution rates and other charges.**

**Learn more. Have your say.**

Waterloo North Hydro Inc. has applied to the Ontario Energy Board to raise its electricity distribution rates effective January 1, 2021. If the application is approved as filed, a typical residential customer and a typical general service customer of Waterloo North Hydro would see the following increases:

Residential (750 kWh)	\$0.70 per month
General Service less than 50 kW (2,000 kWh)	\$4.81 per month

Other customers may also be affected.

Waterloo North Hydro Inc. has also applied for approval to:

- change four Specific Services Charges, related to providing reconnection at meter and reconnection at pole/transformer – during and after regular hours
- establish new standby charges for the General Service 50 kW to 4,999 kW and Large Use customer classes
- charge current and future General Service 50 kW to 4,999 kW and Large Use customers who have load displacement generation, on a gross load billing basis

It is important to review the application carefully to determine whether you may be affected by these changes.

**THE ONTARIO ENERGY BOARD IS HOLDING A PUBLIC HEARING**

The Ontario Energy Board (OEB) will hold a public hearing to consider the application filed by Waterloo North Hydro. At the end of this hearing, the OEB will decide what, if any, rate increase will be allowed.

Distributors such as Waterloo North Hydro typically apply for a full review of their rates every five years. Any rate changes for the years in between are made by applying an OEB-approved formula which is tied to inflation and other factors intended to promote efficiency. You may not get notice of future rate changes made by applying the formula.

The OEB is an independent and impartial public agency. We make decisions that serve the public interest. Our goal is to promote a financially viable and efficient energy sector that provides you with reliable energy services at a reasonable cost.

**BE INFORMED AND HAVE YOUR SAY**

You have the right to information regarding this application and to be involved in the process.

- You can review Waterloo North Hydro's application on the OEB's website now.
- You can file a letter with your comments, which will be considered during the hearing.
- You can become an active participant (called an intervenor). As an intervenor, you can ask questions about Waterloo North Hydro's application and make arguments on whether the OEB should approve Waterloo North Hydro's request. Apply by **August 10, 2020** or the hearing will go ahead without you and you will not receive any further notice of the proceeding.
- At the end of the process, you can review the OEB's decision and its reasons on our website.

**LEARN MORE**

These proposed charges relate to Waterloo North Hydro's distribution services. They make up part of the Delivery line - one of the line items on your bill. Our file number for this case is **EB-2020-0059**. To learn more about this hearing, find instructions on how to file letters or become an intervenor, or to access any document related to this case, please select the file number **EB-2020-0059** from the list on the OEB website: [www.oeb.ca/notice](http://www.oeb.ca/notice). You can also phone our Consumer Relations Centre at 1-877-632-2727 with any questions.

**ORAL VS. WRITTEN HEARINGS**

There are two types of OEB hearings – oral and written. Waterloo North Hydro has applied for a written hearing. The OEB will determine at a later date whether to proceed by way of a written or oral hearing. If you think an oral hearing is needed, you can write to the OEB to explain why by **August 10, 2020**.

**PRIVACY**

If you write a letter of comment, your name and the content of your letter will be put on the public record and the OEB website. However, your personal telephone number, home address and email address will be removed. If you are a business, all your information will remain public. If you apply to become an intervenor, all information will be public.

This rate hearing will be held under section 78 of the Ontario Energy Board Act, 1998, S.O. 1998 c.15 (Schedule B).



To view the full Rate Application, please click [here](#) or visit [www.wnhydro.com/rateapplication](http://www.wnhydro.com/rateapplication).

To contact us, please call our Regulatory Affairs team at 519-886-5090 weekdays between 8:30 am and 4:30 pm or reach us by email at [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com).

Thank You,

Waterloo North Hydro

Waterloo North Hydro | 526 Country Squire Rd, Waterloo, ON N2J 4G8 Canada

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Sent by [regulatory@wnhydro.com](mailto:regulatory@wnhydro.com) powered by



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**SEC-53 - 2020 - Operating and Capital Budget Presentation Dec 19, 2019**



# Waterloo North Hydro Inc.

## 2020 & 2021 Cost of Service Budget Review

December 19, 2019



# Agenda

- **Economic Environment**
- **Customer Engagement**
- **2020 & 2021 Capital & Operating Budgets**
- **Impact on COS Rates**
- **Impact on Debt Load & Shareholder Returns**
- **Recommendations**



# Economic Environment

- Economic Forecasts
- Revenue Base



# Economic Environment - Ontario

Economic Indicator	2019	2020	2021
Real GDP (%)	1.6	1.6	1.7
Employment Growth (%)	2.7	1.0	0.6
Housing Starts (Units)	70,100	75,100	78,400
30 Year Govt. Bond Yield	1.50% to 1.89%	1.50% to 1.80%	1.90% to 2.15%
CPI (%)	2.2	1.8	1.9

Source: TD Bank – October/19



# Economic Assumptions

Economic Indicator	2020 Economic Forecast	2020 & 2021 Budget
Real GDP (%)	2.2	N/A
Employment Growth (%)	1.0	
Customer Growth	N/A	0.8%
Growth in Energy Sales	N/A	0.1%
Housing Starts (Units)	75,100	400
30 Year Govt. Bond Yield	1.50% to 1.80%	3.75% to 4.00%
US \$ Exchange	\$0.75 to \$0.76	\$0.75
CPI (%)	1.8	2.0

# Rate Setting Process

High Level  
Customer  
Engagement  
Needs &  
Preferences

Prepare  
Business  
Plan based  
on High  
Level  
Needs &  
Preferences

Prepare  
2020 &  
2021  
Budget

Detailed  
Customer  
Engagement  
Business  
Plan  
Rate impacts

Finalize  
Budgets

File Rate  
Application  
for Jan 1,  
2021 Rates

OEB Rate  
Hearing  
Process

OEB sets  
WNL's  
Distribution  
Rates

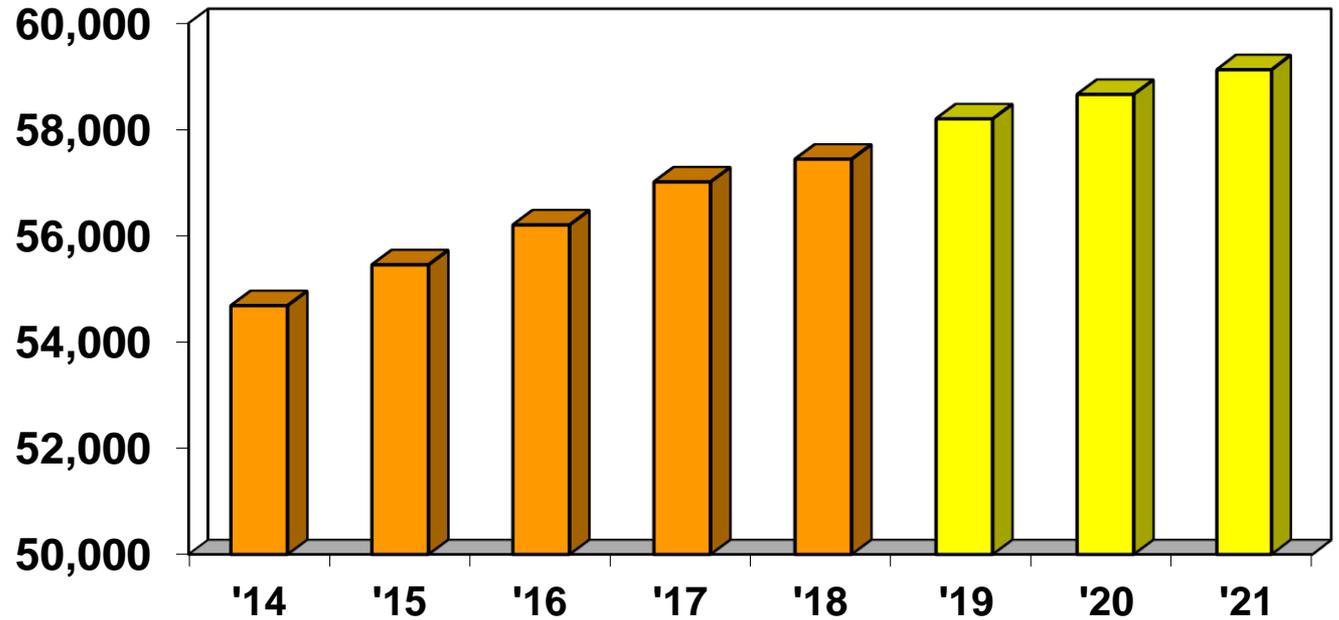


Ontario Energy Board



# Sustainable Growth

Customers  
↑  
6.3% over last  
5 years

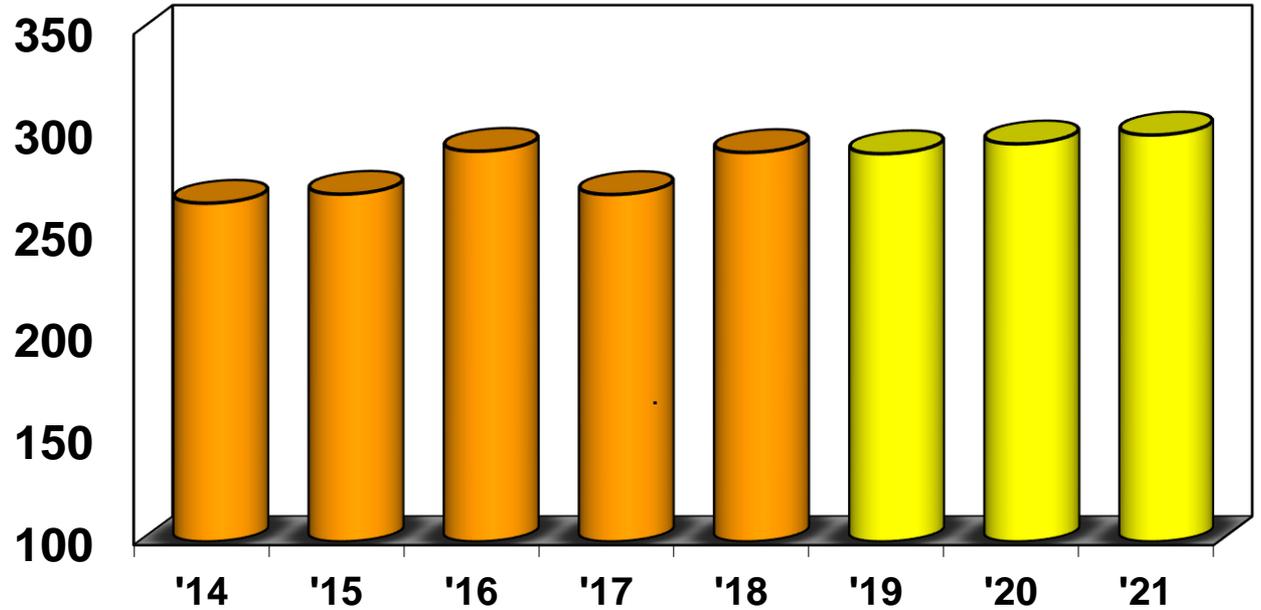




# Peak Growth - MW



**9.1%**  
over  
last 5 years





# Customer Engagement



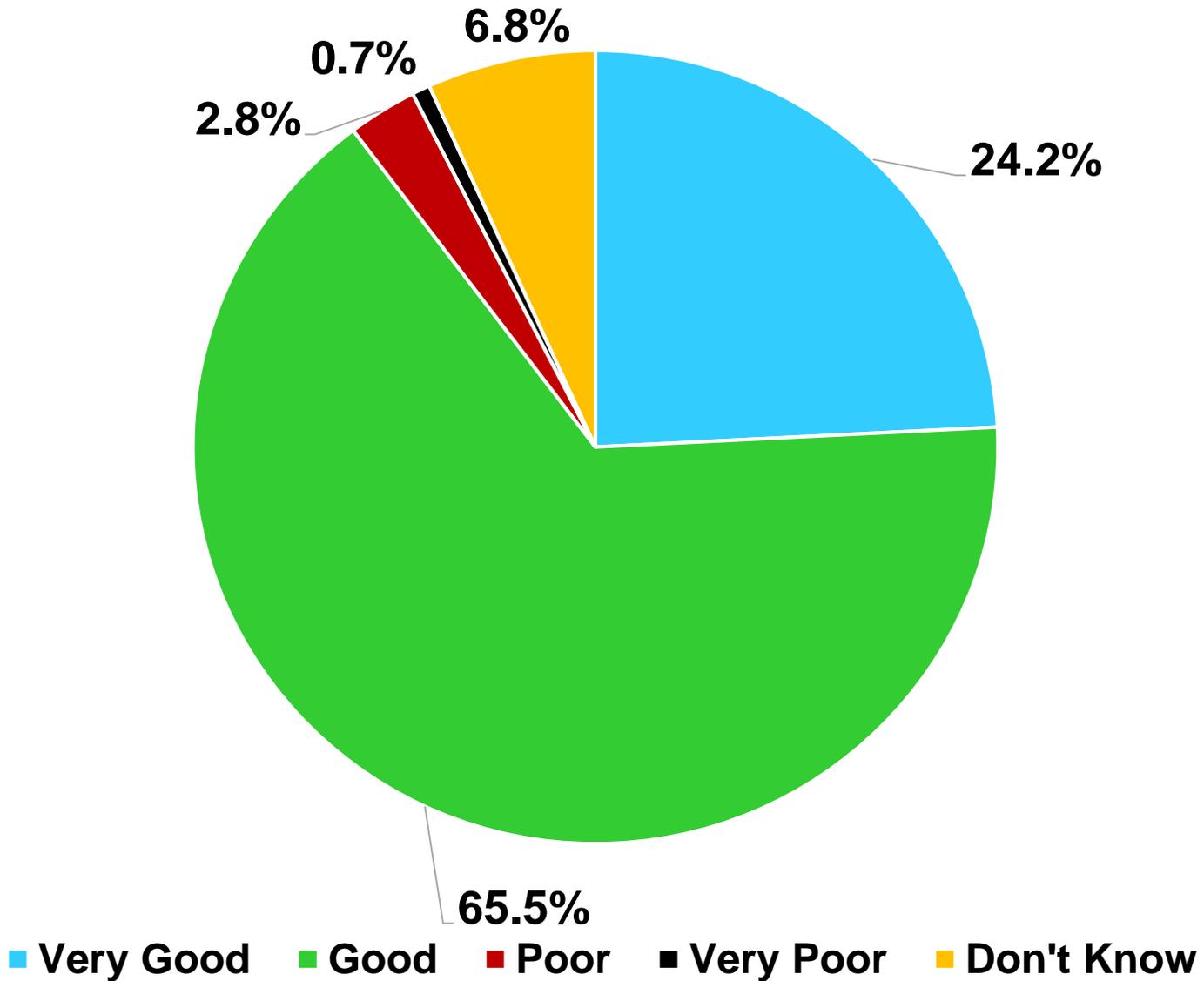


# Detailed Customer Engagement

- 2,393 Online Surveys
- 600 Telephone Surveys
- 32 Large Business Surveys
- Large User - UoW



# Planning for the future?



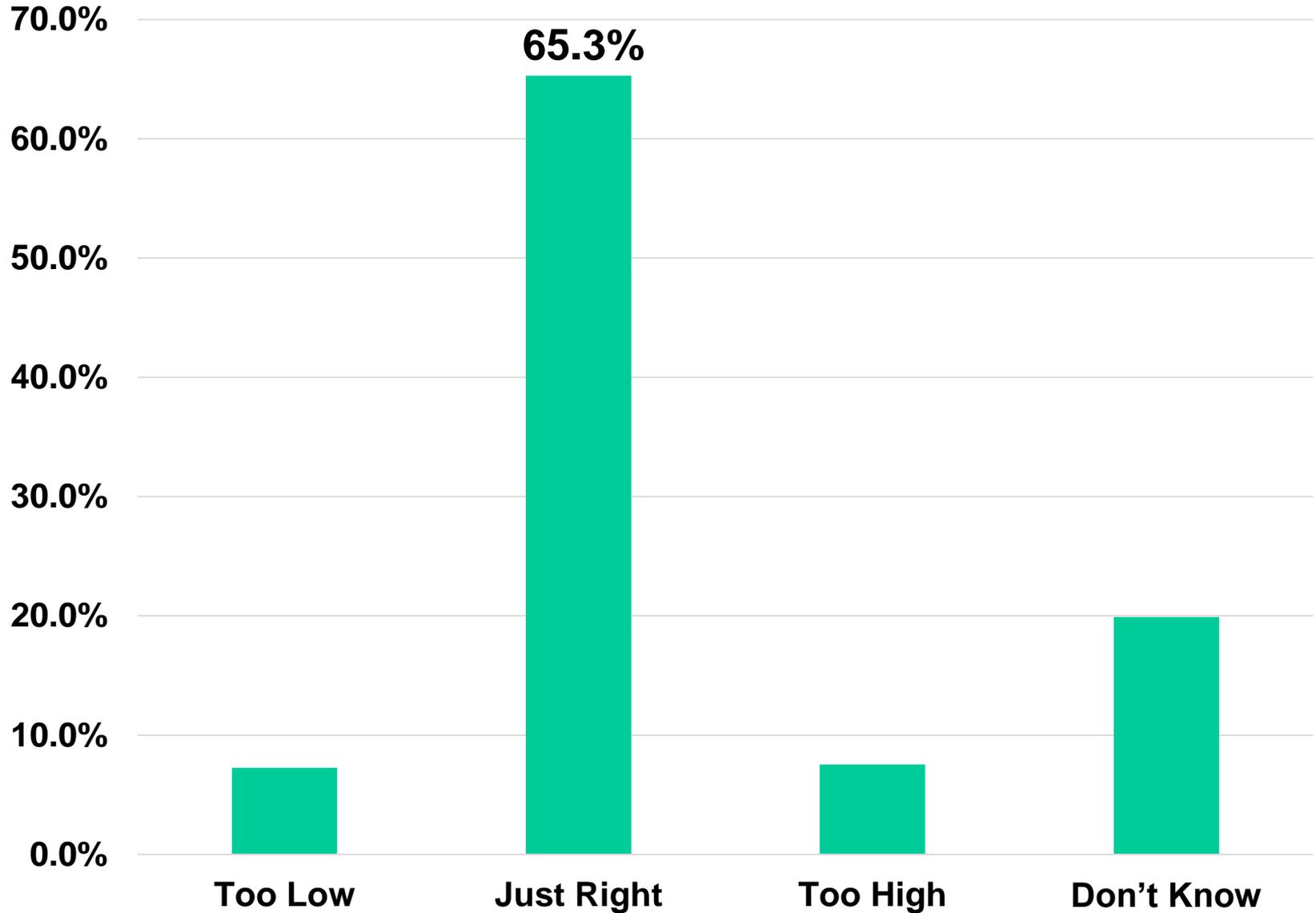


# Reliability Preference?

	Online	Telephone	Large Business
Reducing the length of time to restore power during extreme weather events.	1	1	3
Reducing the number of outages during extreme weather events.	2	2	4
Reducing the overall number of outages.	3	3	1
Reducing the overall length of outages.	4	4	2
Improving the quality of power, as judged by momentary interruptions in power that can result in the flickering or dimming of lights.	5	5	5

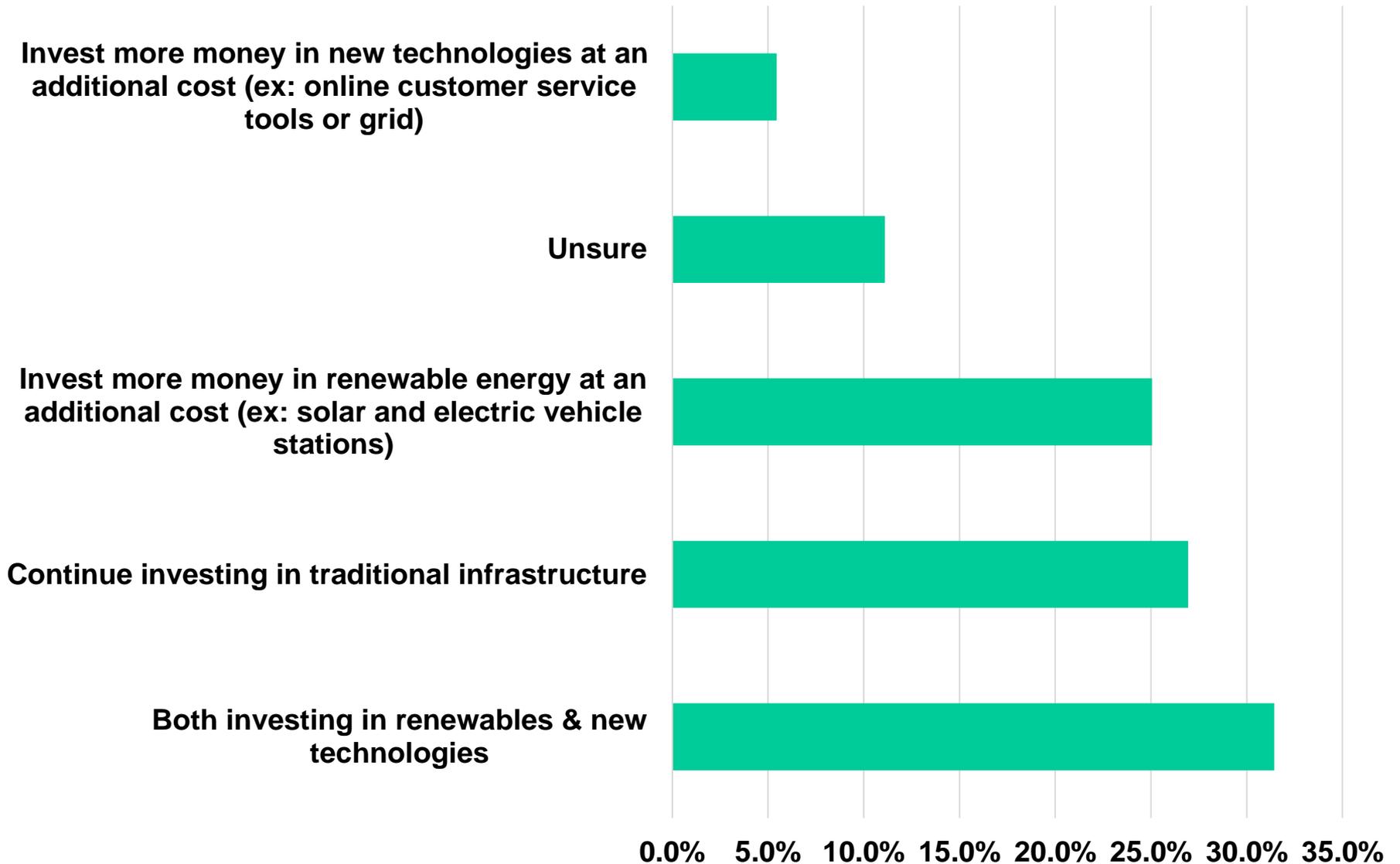


# Level of future CAPEX?



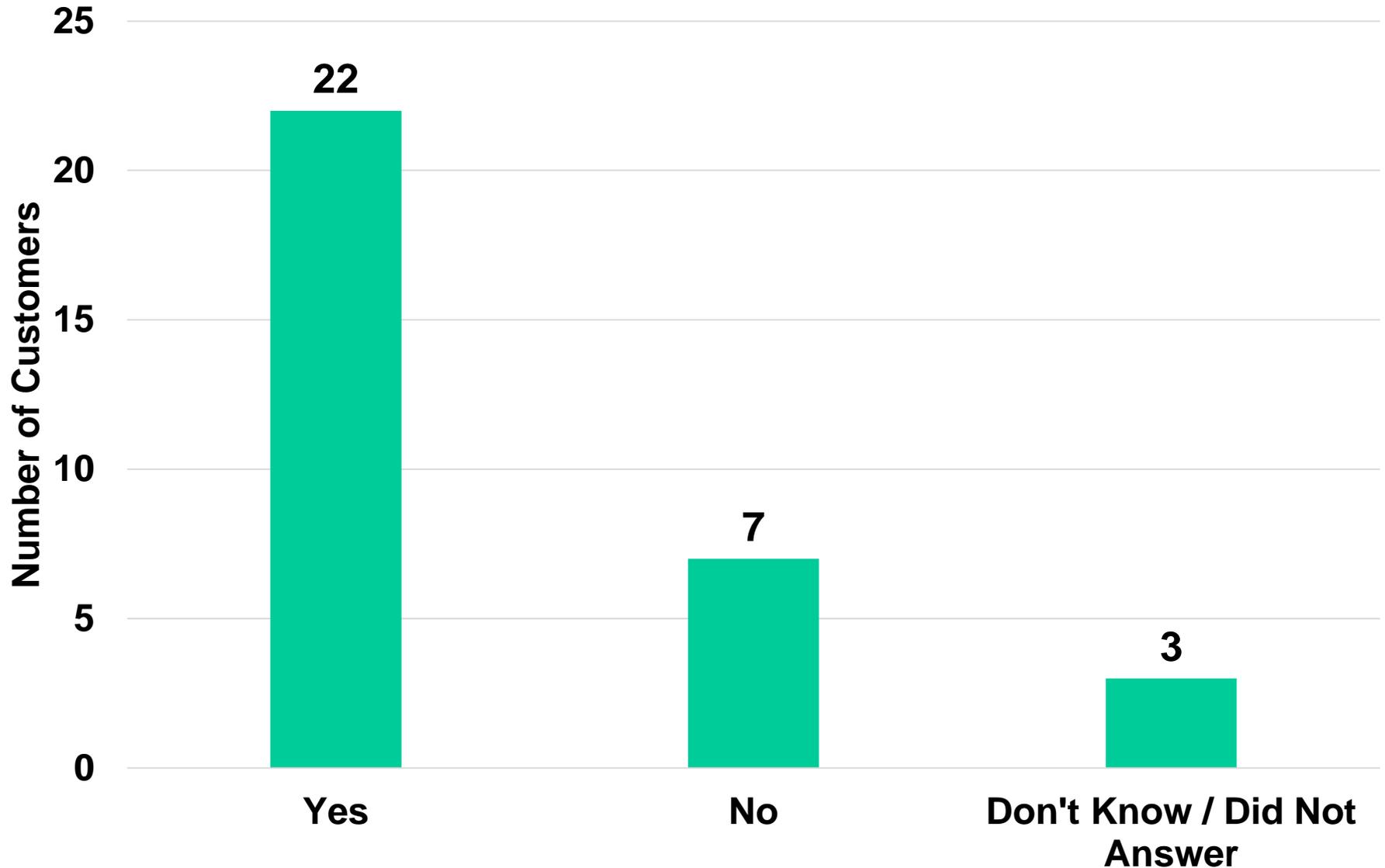


# Environmental Alternatives vs Cost?



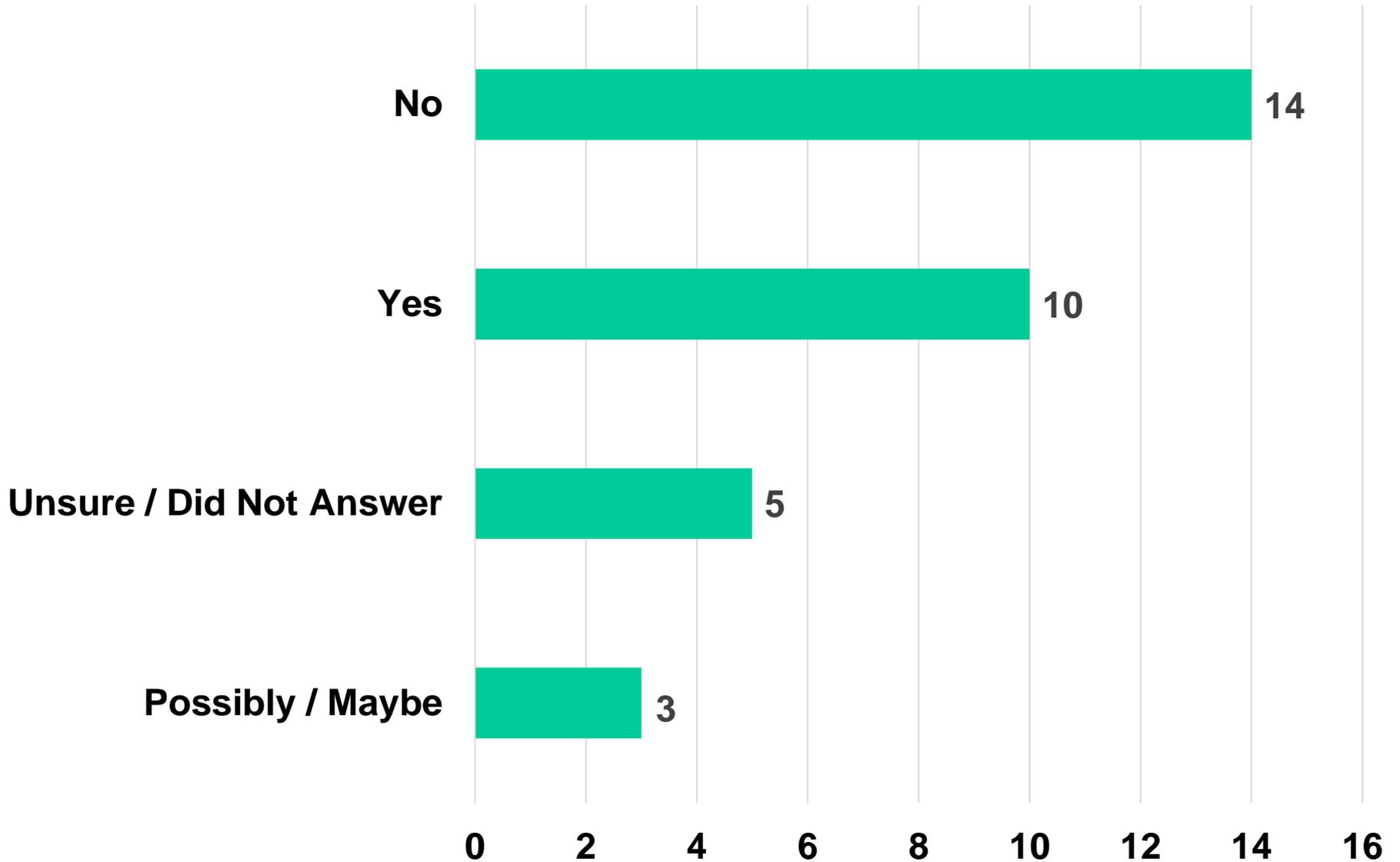


# WNI Key Account Managers?





# Key Account Manager at additional cost?



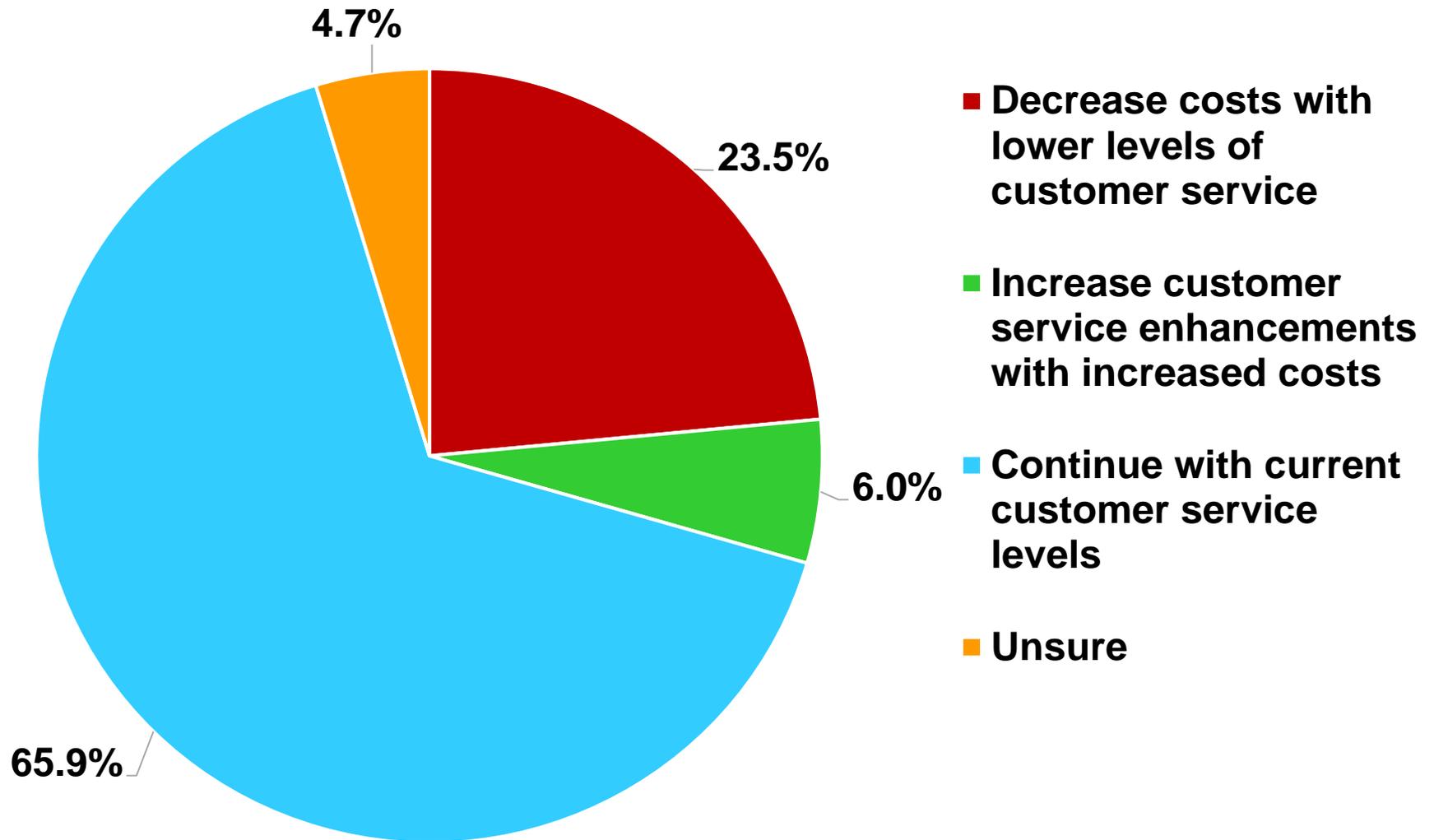


# Innovative Technologies?

- Solar
- Grid Automation/Smart Grid/Smart Switches
- Electric Vehicle
- Renewable/DERs/Microgrids
- Virtual Net Metering
- Customer Service/Customer Monitoring/Outage Alert System
- Battery Storage

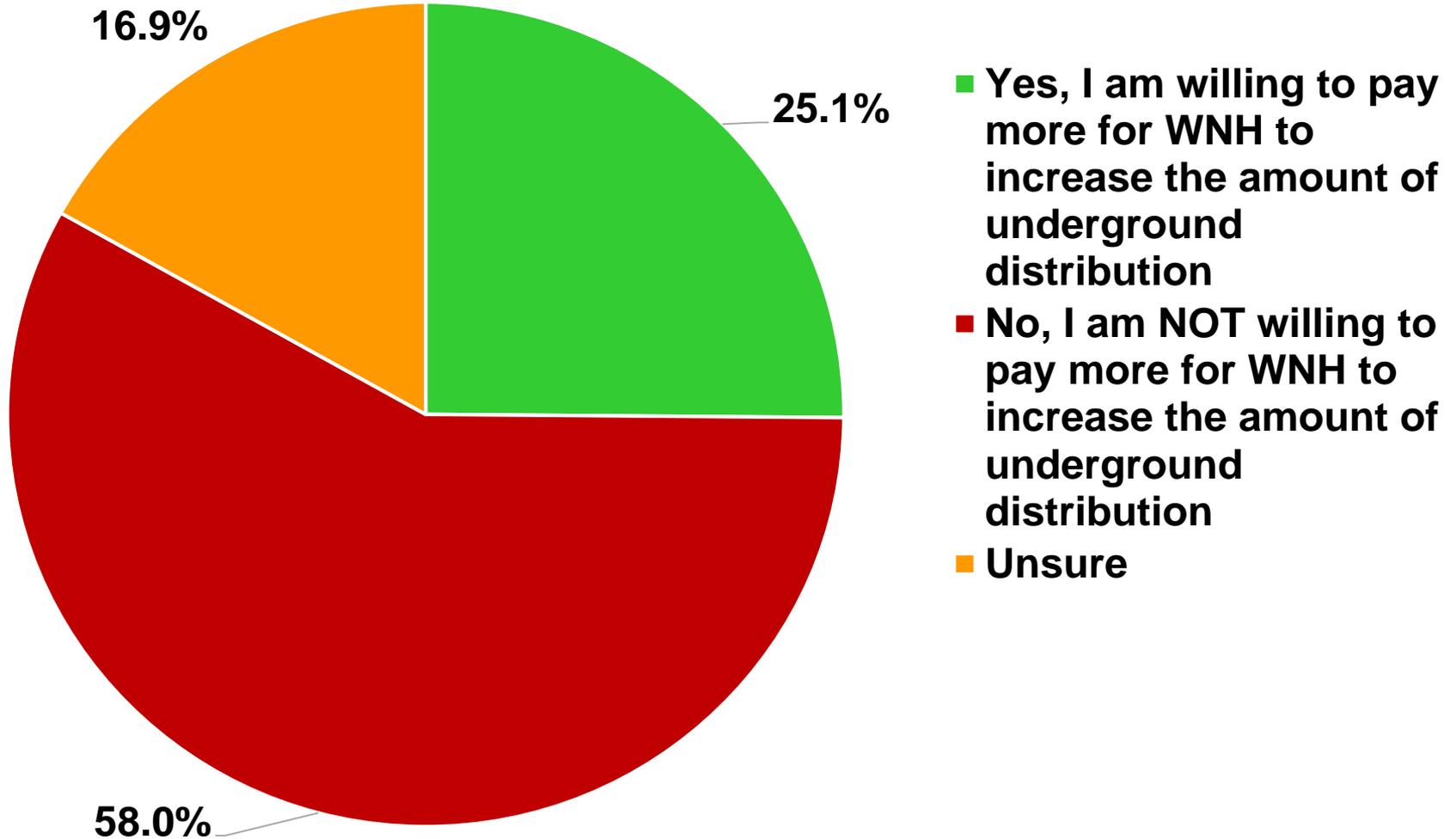


# Additional Enhancements?





# Underground vs Overhead lines?



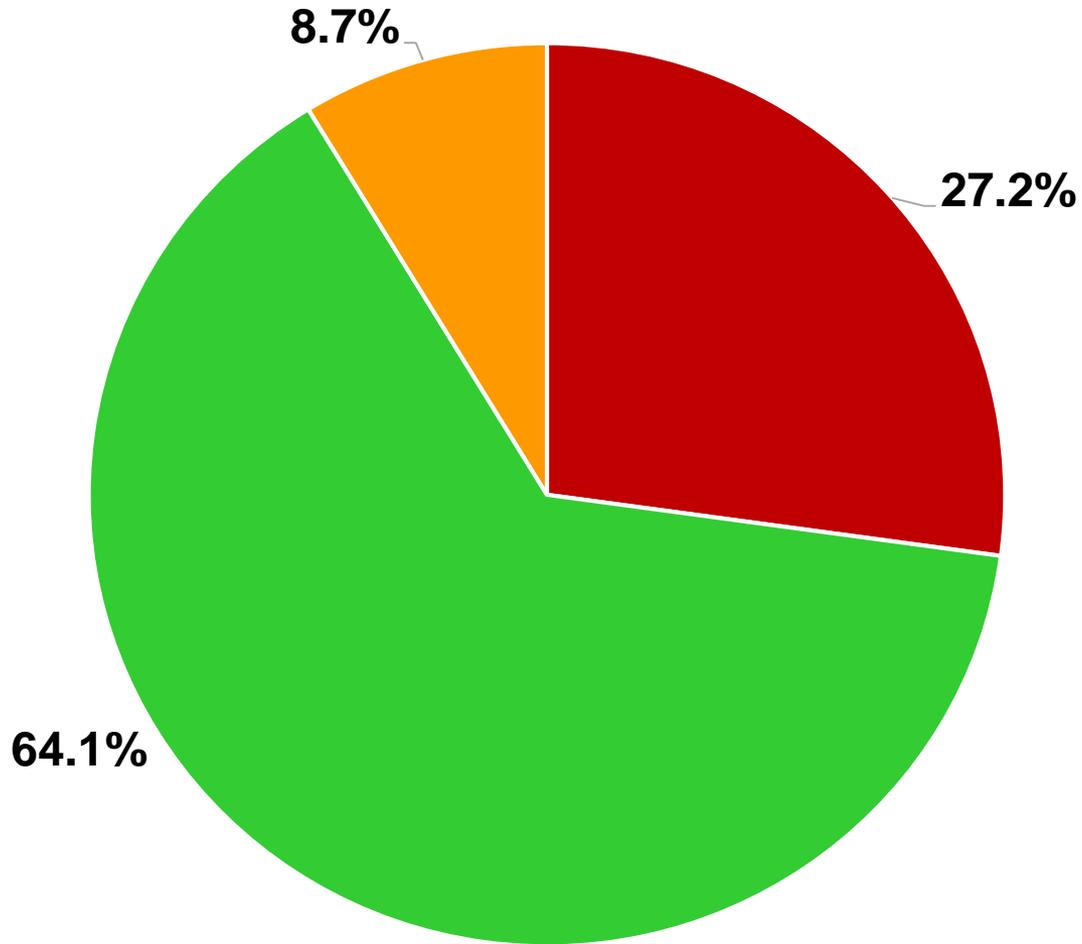


# Service Improvements?

		
Educating customers and the public about electrical safety	80%	79%
Educating customers and the public about energy conservation	79%	82%
An automated outage notification system (automatically sends messages)	74%	77%
Reporting issues or making inquiries through an interactive website	72%	75%
Comparing your electricity consumption with others in the area	55%	54%
Automated alerts when electricity usage exceeds a prearranged threshold	53%	56%
Having an online chat feature on the WNH website during business hours	44%	43%
Automated alerts to remind you of your bill due date	43%	45%
Automated alerts estimating what your upcoming bill might be	35%	36%
Extended office hours (current hours are Monday-Friday 8:30 am – 4:30 pm)	18%	17%



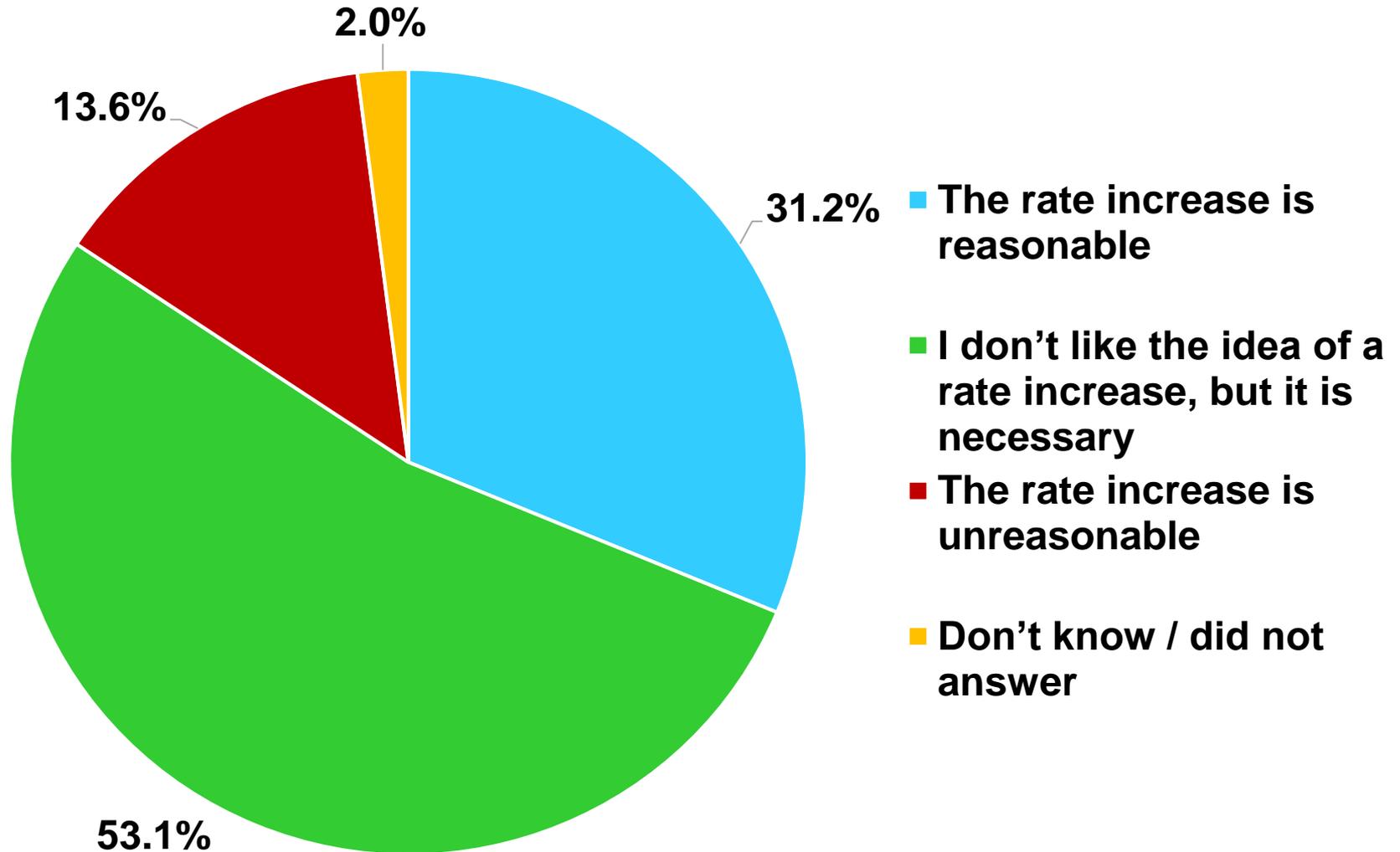
# Decrease Service Levels to reduce cost?



■ Yes ■ No ■ Unsure



# Support for Rate Increase?





# Waterloo North Hydro Inc.

## Financial Overview



# Budget Objectives

Corporate Criteria	Objective
Supply & Reliability	Maintain/Improve
Customer Service	Increase
Rates to Customers	CPI - 2.0%
Controllable Costs	< CPI
Return on Equity	6.7% to 8.2%
Debt Ratio	<55.0%
Return to Shareholder	50.0% of Income from Operations



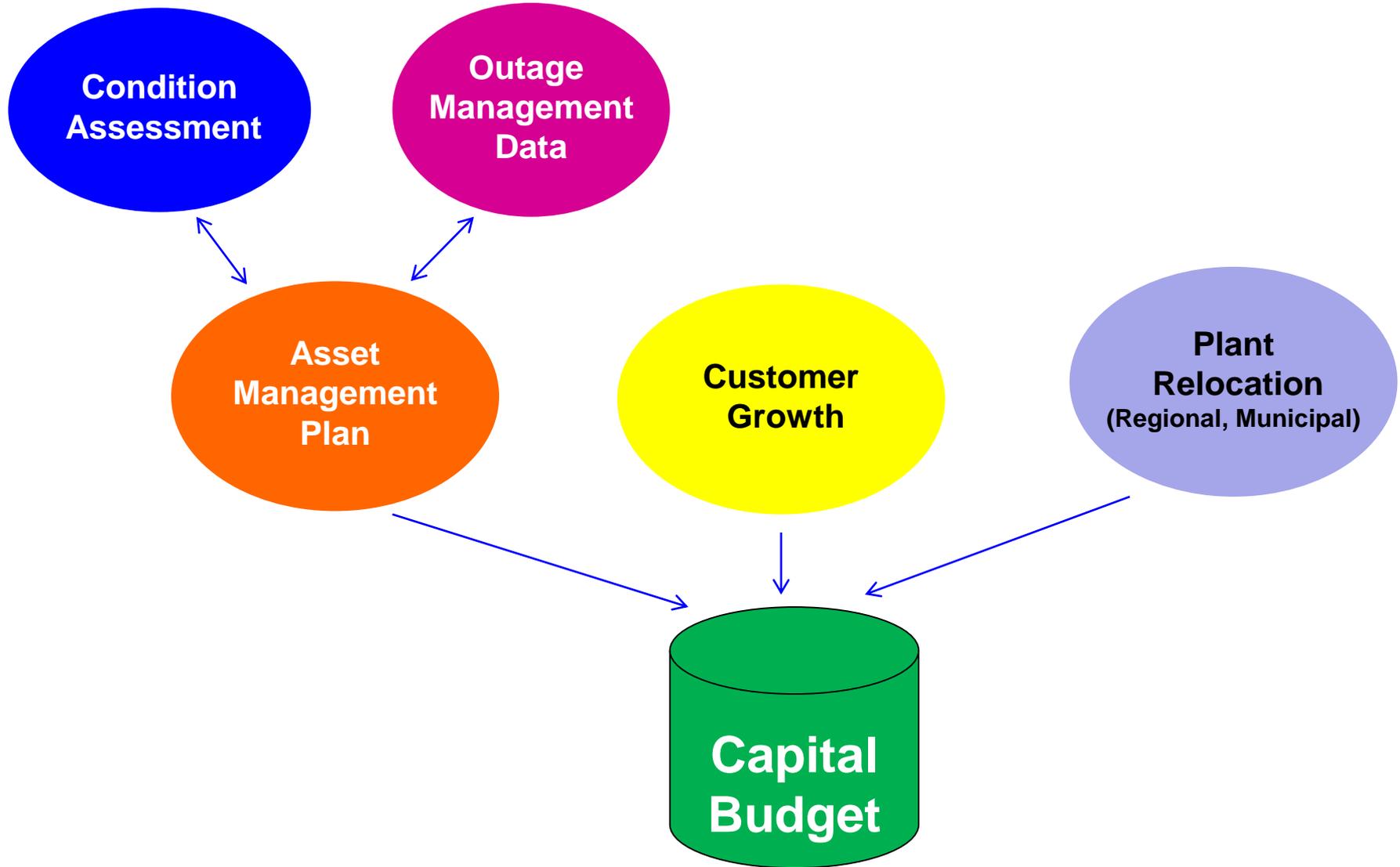
# Waterloo North Hydro Inc.

**2020/2021**

**Capital Investment Program**



# What drives the Capital Budget





# Capital Budget Expenditures (\$000,s)

	2020 Budget	2021 Budget
<b>New Plant</b>	\$ 6,095	\$ 6,346
<b>Plant Rebuild &amp; Upgrade</b>	8,183	8,124
<b>Work Required by Road Widenings</b>	1,454	1,031
<b>Transformer Stations</b>	1,756	1,260
<b>Rolling Stock, Equipment &amp; Systems</b>	2,718	2,288
<b>Sub-Total</b>	\$ 20,205	\$ 19,049
<b>Street Lighting</b>	446	585
<b>TOTAL</b>	\$ 20,650	\$ 19,634

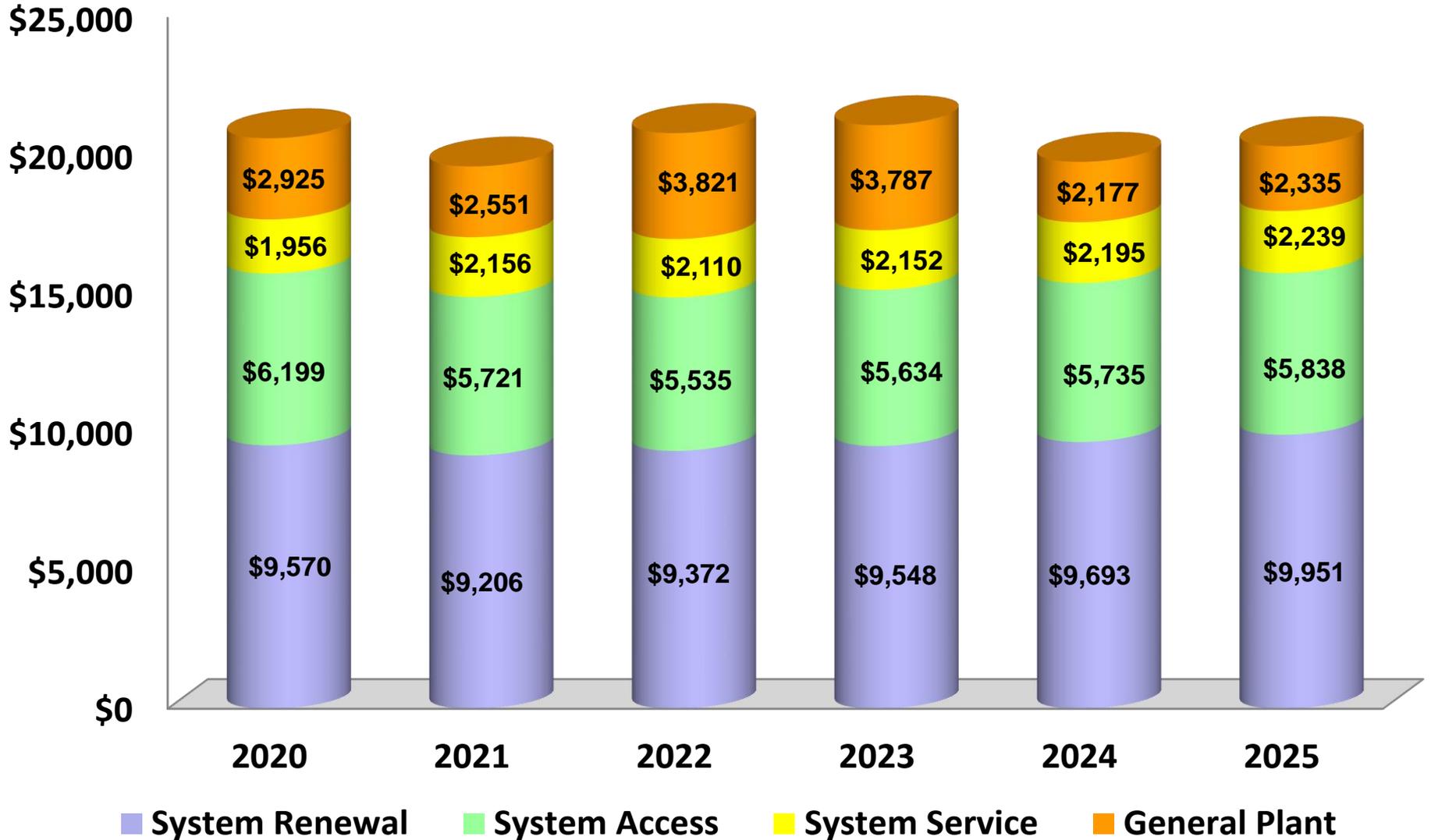


# Capital Budget Funding (\$000,s)

	<b>2020 Forecasted Financing</b>	<b>2021 Forecasted Financing</b>
<b>Cash from Operations</b>	<b>\$ 16,788</b>	<b>\$ 16,985</b>
<b>Less: Debt Repayment</b>	<b>(6,547)</b>	<b>(5,616)</b>
<b>Regulatory Liabilities</b>	<b>(72)</b>	<b>(72)</b>
<b>Dividend Payments</b>	<b>(3,776)</b>	<b>(3,776)</b>
<b>Free Cash Flow</b>	<b>\$ 6,394</b>	<b>\$ 7,521</b>
<b>Cash from Capital Contributions</b>	<b>\$ 2,066</b>	<b>\$ 2,642</b>
<b>Cash from Street Lighting</b>	<b>446</b>	<b>585</b>
<b>Cash Available</b>	<b>\$ 8,905</b>	<b>\$ 10,749</b>
<b>Less: CAPEX</b>	<b>(20,205)</b>	<b>(19,049)</b>
<b>Borrowings Required</b>	<b>\$ (11,300)</b>	<b>\$ (8,300)</b>



# CAPEX Projections (\$000,s)





# Operating Budget (\$000,s)

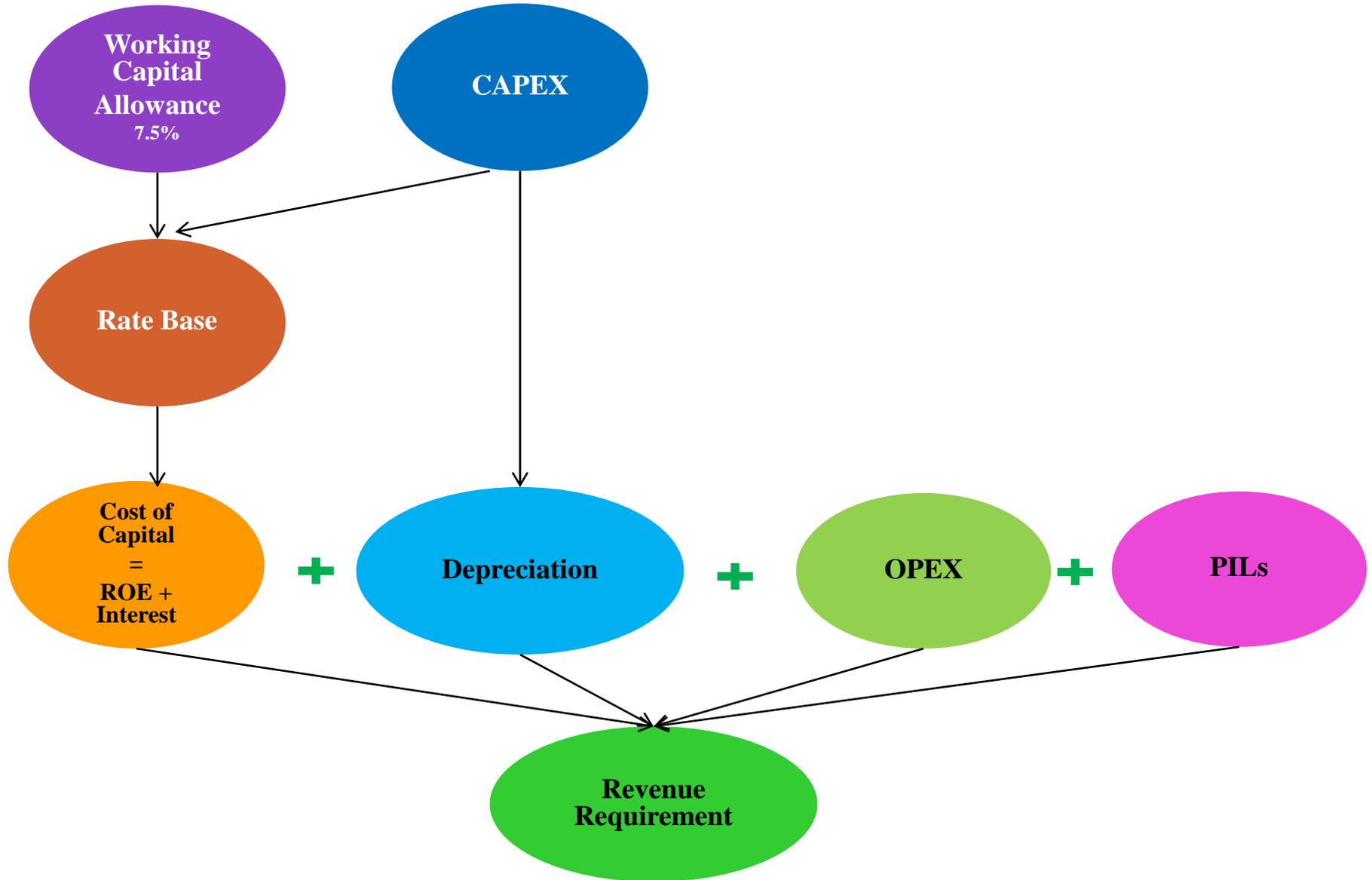
	2019 Budget	2019 Proj. Actual	2020 Budget	2021 Budget
Revenue from normal operations	\$ 37,650	\$ 37,845	\$ 38,565	\$ 41,031
Controllable Costs	<u>14,925</u>	<u>15,245</u>	<u>15,575</u>	<u>16,248</u>
Earnings before Interest, Taxes & Dep'n	\$ 22,725	\$ 22,600	\$ 22,990	\$ 24,783
Depreciation	<u>10,142</u>	<u>9,977</u>	<u>10,657</u>	<u>11,048</u>
Earnings before Interest & Taxes	\$ 12,583	\$ 12,623	\$ 12,333	\$ 13,735
Interest	<u>5,090</u>	<u>4,947</u>	<u>5,212</u>	<u>5,151</u>
Earnings before Taxes	\$ 7,493	\$ 7,676	\$ 7,121	\$ 8,584
PILs & Taxes	419	435	280	525
<b>Net Income</b>	<b>\$ 7,074</b>	<b>\$ 7,241</b>	<b>\$ 6,841</b>	<b>\$ 8,059</b>



# Waterloo North Hydro Inc.

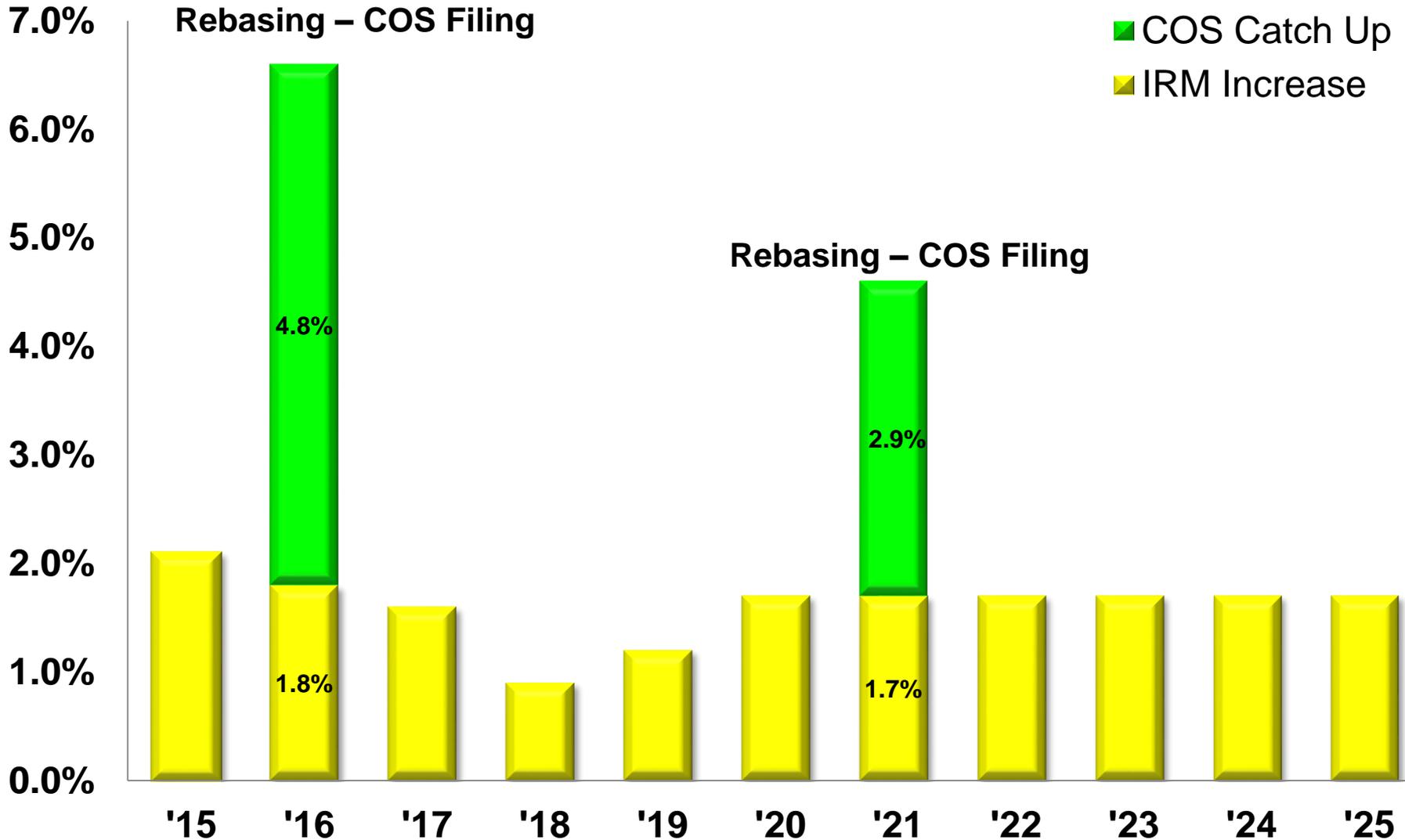
## Impact on Rates and Debt

# Rate Setting Formula

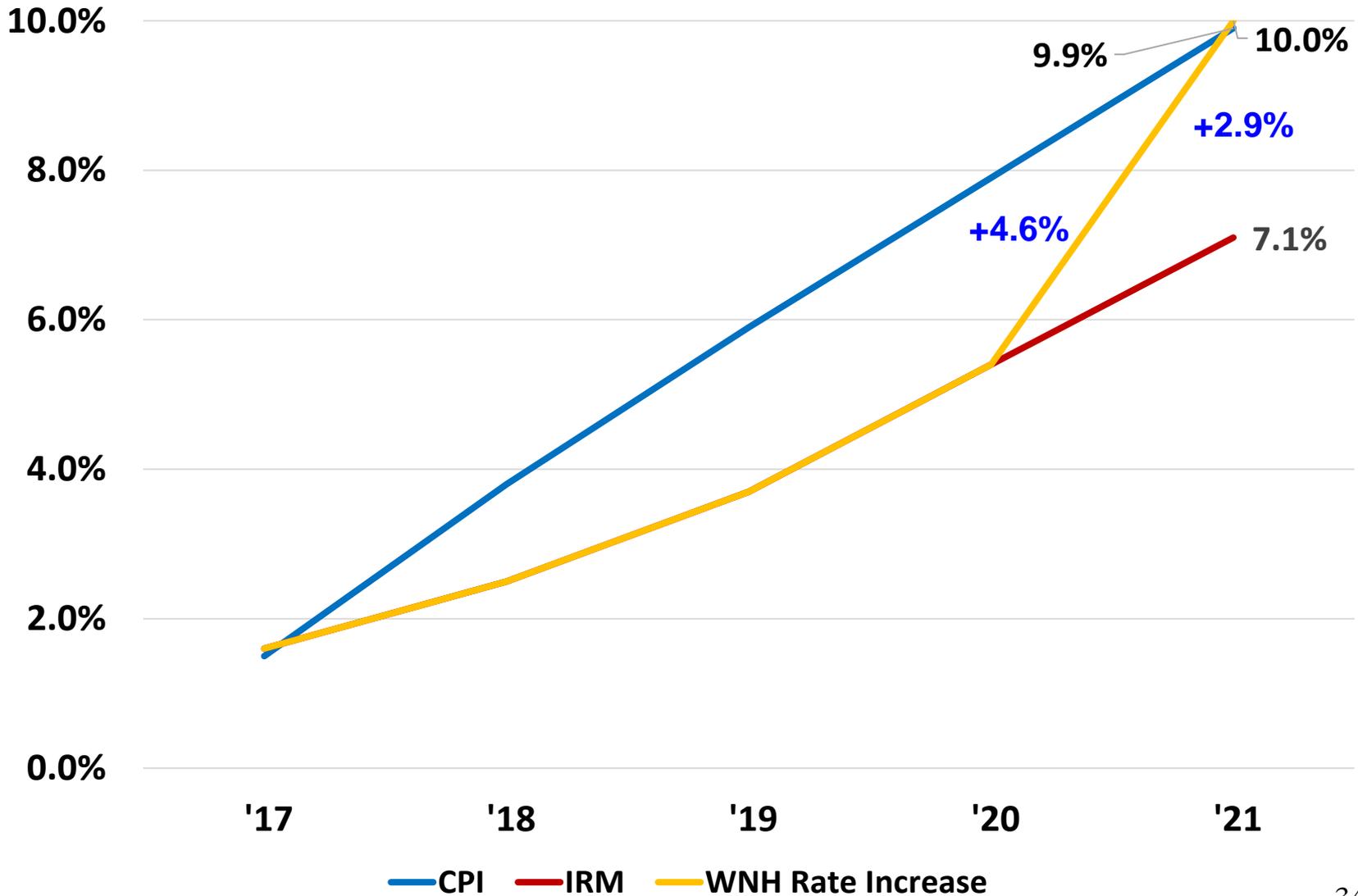


# Waterloo North Hydro Inc.

## *% Increase – Distribution Rates*



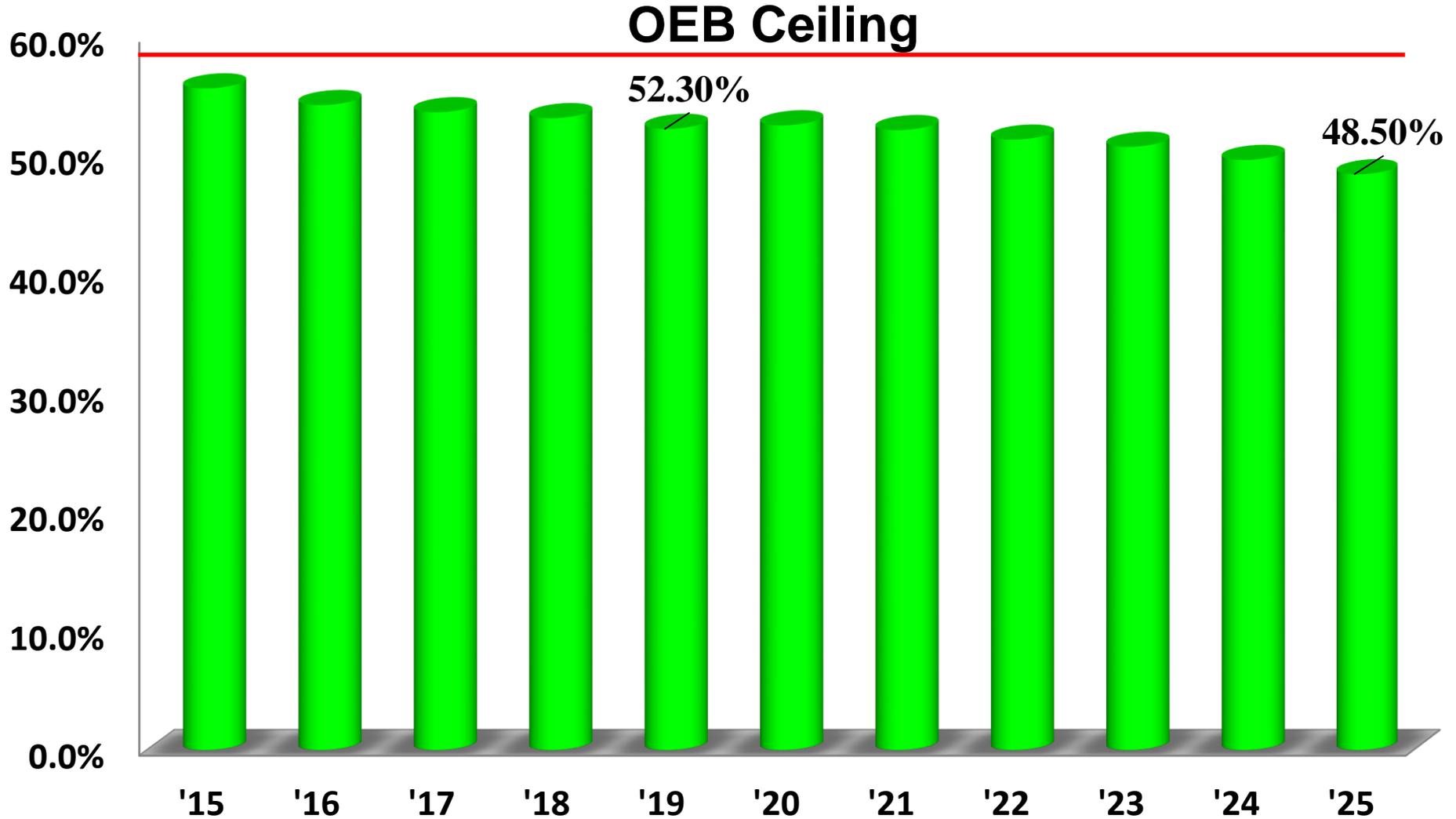
# Projected Rate Increases





# Waterloo North Hydro Inc.

## Debt Ratio



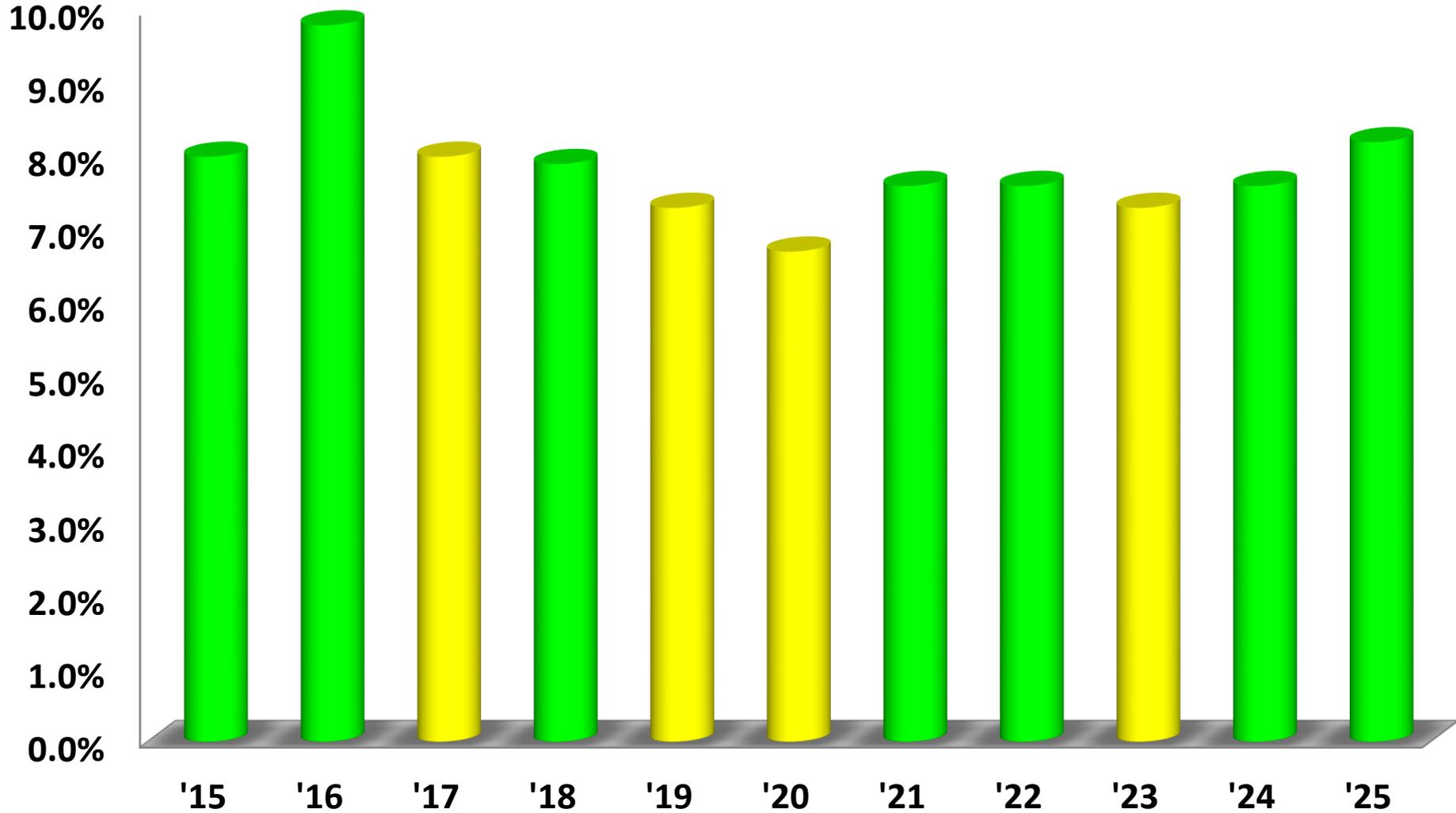


# Waterloo North Hydro Inc.

## Impact on Shareholder Returns



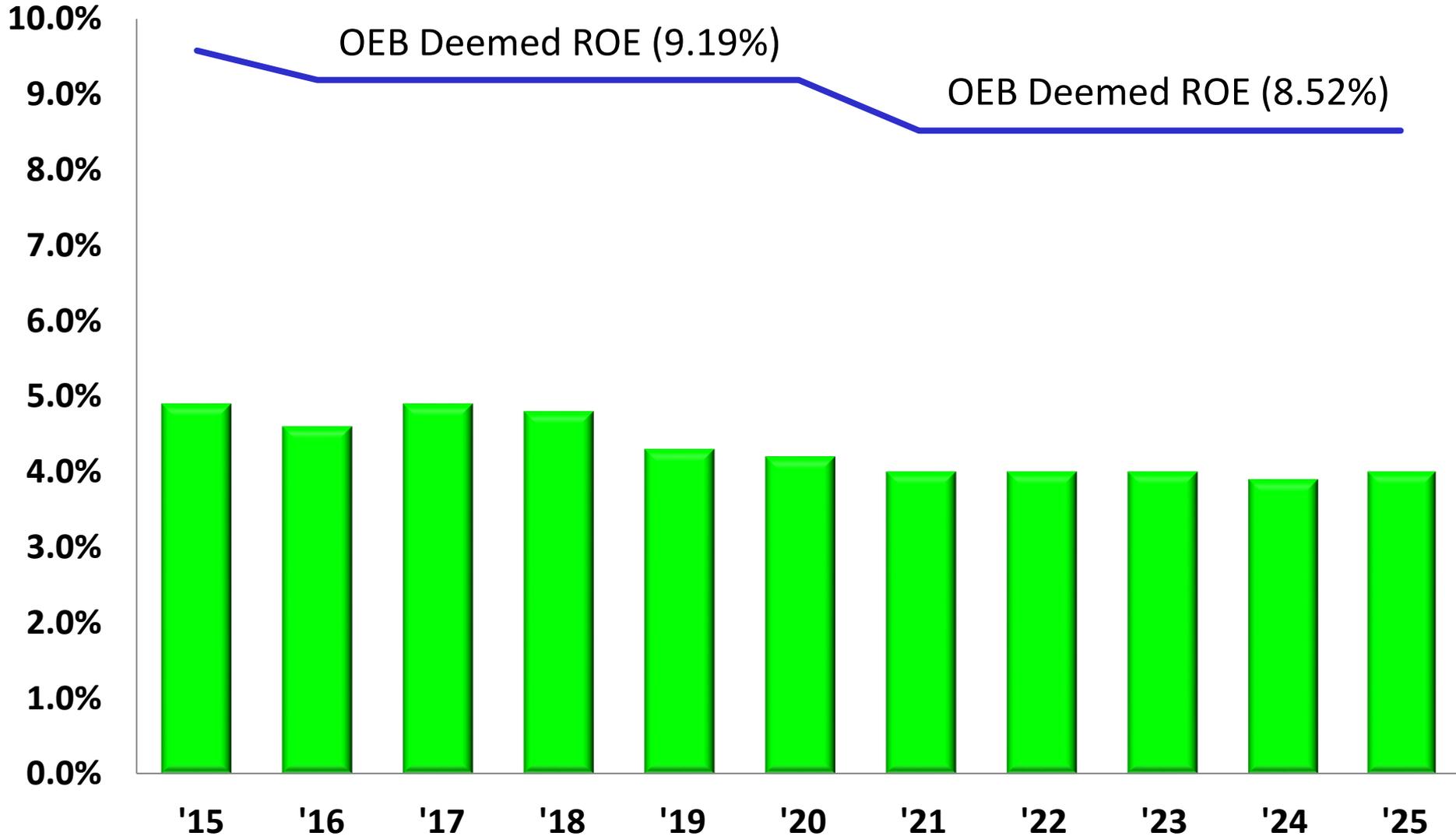
# *Return on Equity (ROE)*





# Shareholder ROE

## Dividends + Interest





# Return to Shareholder (\$000,s)

	2019	2020	2021
Annual Dividend	\$3,776	\$3,776	\$3,776
Interest – Sr. Debt	1,036	1,039	1,036
Interest – Jr. Debt	920	923	704
<b>Total Return</b>	<b>\$5,732</b>	<b>\$5,738</b>	<b>\$5,516</b>



# Budget Objectives

Corporate Criteria	Objective	Achieved
Supply & Reliability	Maintain/Improve	✓
Customer Service	Increase	✓
Rates to Customers	CPI - 2.0%	✓
Controllable Costs	< CPI	✓
Return on Equity	6.7% to 8.2%	✓
Debt Ratio	< 55.0%	✓
Return to Shareholder	50.0% of Income from Operations	✓



# Waterloo North Hydro Inc.

Questions??



## PROPOSED 2020 & 2021 OPERATING & CAPITAL BUDGETS

The President & CEO and the Vice President, Finance & CFO, in consultation with the Senior Management recommend the following:

1. That the staff report and the presentation of the 2020 & 2021 Operating and Capital Budgets be received;
2. That the 2020 & 2021 Capital Budgets in the amount of \$20,650,259 and \$19,633,782, respectively, be approved;
3. That the 2020 Operating Budget with Distribution & Other Revenues of \$38,565,427, Controllable costs of \$15,575,432 and Net Earnings of \$6,840,612 be approved;
4. That the 2021 Operating Budget with Distribution & Other Revenues of \$41,030,624, Controllable costs of \$16,248,008 and Net Earnings of \$8,059,101 be approved; and
5. That the 2022 to 2025 Four Year Capital Plan be received.

**SEC-67 – Letter From Consultant**

# Marjorie Richards & Associates Ltd.



November 3, 2020

Ms. Christine Long  
Registrar  
Ontario Energy Board  
2300 Yonge Street, Suite 2700  
Toronto, ON  
M4P 1E4

**Re: EB-2020-0059 – Waterloo North Hydro Inc. (“WNH”) 2021 Rate Application  
Marjorie Richards & Associates Ltd. letter to Ontario Energy Board (“OEB”) regarding  
confidentiality of consultation documents**

Dear Ms. Long:

We understand that WNH has been asked to submit to the OEB in the above-mentioned proceeding, the following consultation documents prepared by Marjorie Richards & Associates Ltd.:

- Executive Incentive Program Overview
- Executive Team Annual Incentive Plan
- Executive Incentive Program S.M.A.R.T. Objective Guideline
- Executive Objectives Setting and Evaluation Form (example for 2015 provided by Consultant)
- WNH Balanced Scorecard for 2016
- Tool with Example

(collectively, the “Documents”).

We are requesting that the Documents be treated as confidential.

We presented the Documents to the Compensation and HR Committee of the WNH’s Board for the development of an executive total compensation plan.

The disclosure of the Documents on the public record would be prejudicial to our position as a consulting firm that provides consultation on strategic approaches to executive compensation. As a consulting firm, we are engaged in a competitive business.

The disclosure of the details of our recommendations, strategies, and plans for WNH related to executive compensation could reasonably be expected to prejudice our economic interest, competitive position, and be injurious to our financial interests as it would enable our competitors to ascertain our methodologies, prior recommendations, and plans. Our competitors can then use this information to inform their own

methodologies, recommendations, and plans while maintaining strict confidentiality of their internal methodologies, recommendations, and plans, which would allow them to gain an advantage over us.

For the reasons above, we request that the Documents be treated as confidential.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Richards", with a large, stylized initial "M" that loops around the first part of the name.

Marjorie Richards

Principal Owner, Marjorie Richards & Ass. Ltd.