

BY E-MAIL

November 26, 2020

Christine E. Long  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto ON M4P 1E4

Dear Ms. Long:

**Re: Niagara Peninsula Energy Inc. (Niagara Peninsula Energy)  
Application for 2021 Electricity Distribution Rates  
Ontario Energy Board File Number: EB-2020-0040**

In accordance with Procedural Order No. 1, OEB staff advises the OEB that parties have generally come to an agreement regarding an issues list for Niagara Peninsula Energy's 2021 distribution rate application. The proposed issues list is attached.

There is one addition proposed by the Distributed Resource Coalition, on which the Vulnerable Energy Consumers Coalition took no position. This issue is shown highlighted on the attached under Issue 1.1.

Yours truly,

*Original Signed By*

Donald Lau  
Project Advisor – Electricity Distribution: Major Rate Applications & Consolidations

Attach.

**PROPOSED ISSUES LIST**  
**EB-2020-0040**  
**Niagara Peninsula Energy Inc. (Niagara Peninsula Energy)**

**1.0 PLANNING**

**1.1 Capital**

Is the level of planned capital expenditures appropriate and is the rationale for planning and pacing choices appropriate and adequately explained, giving due consideration to:

- customer feedback and preferences
- productivity
- benchmarking of costs
- reliability and service quality
- impact on distribution rates
- the condition of distribution assets, service quality, system reliability and the availability of non-wires alternatives (NWAs), including distributed energy resources, in the planning process
- investment in NWAs where appropriate
- trade-offs with OM&A spending
- government-mandated obligations
- the objectives of Niagara Peninsula Energy and its customers
- the distribution system plan
- the business plan

**1.2 OM&A**

Is the level of planned OM&A expenditures appropriate and is the rationale for planning choices appropriate and adequately explained, giving due consideration to:

- customer feedback and preferences
- productivity
- benchmarking of costs
- reliability and service quality
- impact on distribution rates
- trade-offs with capital spending
- government-mandated obligations
- the objectives of Niagara Peninsula Energy and its customers
- the distribution system plan
- the business plan

## **2.0 REVENUE REQUIREMENT**

- 2.1** Are all elements of the revenue requirement reasonable, and have they been appropriately determined in accordance with OEB policies and practices?
- 2.2** Has the revenue requirement been accurately determined based on these elements?

## **3.0 LOAD FORECAST, COST ALLOCATION AND RATE DESIGN**

- 3.1** Are the proposed load and customer forecast, loss factors and resulting billing determinants appropriate, and, to the extent applicable, are they an appropriate reflection of the energy and demand requirements of Niagara Peninsula Energy's customers?
- 3.2** Are the proposed customer classes appropriate?
- 3.3** Are the proposed cost allocation methodology, allocations, and revenue-to-cost ratios, appropriate?
- 3.4** Are Niagara Peninsula Energy's proposals for rate design appropriate?
- 3.5** Are the proposed Retail Transmission Service Rates and Low Voltage Service Rates appropriate?

## **4.0 ACCOUNTING**

- 4.1** Have all impacts of any changes in accounting standards, policies, estimates and adjustments been properly identified and recorded, and is the rate-making treatment of each of these impacts appropriate?
- 4.2** Are Niagara Peninsula Energy's proposals for deferral and variance accounts, including the balances in the existing accounts and their disposition, requests for discontinuation of accounts, and the continuation of existing accounts, appropriate?

## **5.0 OTHER**

- 5.1** Are the Specific Service Charges, Retail Service Charges, and Pole Attachment Charge appropriate?
- 5.2** Is it appropriate to align Niagara Peninsula Energy's rate year to its fiscal year with rates changing from May 1 to January 1 with a proposed effective date of January 1, 2021 for 2021 rates?