



December 4, 2020

Ms. Christine E. Long, Registrar
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Long,

**Re: ENWIN Utilities Ltd.
2021 IRM Rate Application – Draft Decision and Rate Order Comments
EB-2020-0017**

On December 1, 2020, the Ontario Energy Board (“OEB”) issued a draft of the Decision and Rate Order for ENWIN Utilities Ltd.’s (“ENWIN”) 2021 IRM Rate Application, along with an updated 2021 IRM Rate Generator Model and LRAMVA Workform. The OEB requested that ENWIN review the draft Decision and accompanying Rate Order and provide comments by December 4, 2020.

ENWIN’s comments are provided below.

Updated 2021 IRM Rate Generator Model

Reference	Comment
Tab 19. - Final Tariff Schedule	<ul style="list-style-type: none">• The fixed and volumetric distribution charges require updating to reflect ENWIN’s elected final inflation parameter of 2.2% (a net increase of 1.9% after ENWIN’s 0.3% stretch factor)• The Wireline Pole Attachment Charge and Retail Service Charges require updating to reflect the final inflation parameter of 2.2%• Tab 16. - Rev2Cost_GDPIPI and Tab 17. - Regulatory Charges do properly reflect the above-noted adjustments
Tab 20. - Bill Impacts	<ul style="list-style-type: none">• The impact of above issues on Tab 19 flow into the estimated bill impacts calculated on Tab 20• The bill impacts as shown require updating to reflect the latest Ontario Electricity Rebate percentage of 33.2%

ENWIN has corrected the above issues in the attached 2021 IRM Rate Generator Model (2021-IRM-Rate-Generator-Model - ENWIN Updated 20201204).



Draft Decision and Rate Order

Reference	Comment
Cover Page	<ul style="list-style-type: none">• "UTILITES" should be "UTILITIES"
p. 1 – Second paragraph	<ul style="list-style-type: none">• ENWIN customer count should be updated to "approximately 90,000" to be consistent with the most recent RRR data
p. 7 – Third paragraph	<ul style="list-style-type: none">• "...and disposition in this proceeding with help limit the impacts..." should be "...and disposition in this proceeding <u>will</u> help limit the impacts..."
p. 9 – c) Group 1 Accounts – Second paragraph	<ul style="list-style-type: none">• The balances proposed for disposition reconcile with the amounts reported as part of the OEB's <i>Electricity Reporting and Record-Keeping Requirements</i>, with any differences noted on Tab 3. – Continuity Schedule of the 2021 IRM Rate Generator Model explained within ENWIN's written evidence
p. 13 and Footnote 25	<ul style="list-style-type: none">• Forecast conservation savings of 0 kWh were contained in ENWIN's 2009 Cost of Service proceeding (EB-2008-0227) load forecast, rather than ENWIN's 2020 Cost of Service proceeding (EB-2019-0032) load forecast

Schedule A - Tariff of Rates and Charges

Reference	Comment
General	<ul style="list-style-type: none">• Updates to Tab 19 of the 2021 IRM Rate Generator Model will need to be reflected in the Tariff of Rates and Charges attached as Schedule A

Should you have any questions, please do not hesitate to contact the undersigned.

Yours very truly,

ENWIN Utilities Ltd.

A handwritten signature in black ink, appearing to read "Paul J. Gleason", written over a light blue horizontal line.

Paul J. Gleason, BA, LL.M.
Director, Regulatory Affairs & Corporate Secretary

cc: Alexander Di Ilio, OEB Staff