



**CANADIAN NIAGARA POWER INC.**

**A FORTIS** ONTARIO  
*Company*

December 15, 2020

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

Dear Ms. Long:

**Re: EB-2020-0008 Canadian Niagara Power Inc. 2021 IRM Application  
CNPI Comments on 2021 Tariff**

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In accordance with the OEB's Decision and Rate Order dated December 10, 2020, CNPI has reviewed the Tariff of Rates and Charges set out in Schedule A. CNPI believes that a correction is required in respect of the LRAMVA rate rider of \$25.0829/kW for its Street Lighting rate class.

In response to IR Staff-9, CNPI identified that a rate rider of \$25.0829/kW, based on a 12-month disposition period, would result in total bill impacts of 23.7%. To mitigate bill impacts, CNPI proposed a 48-month disposition period (for the portion of the LRAMVA claim allocated to its Street Lighting rate class only), reducing the rate rider to \$6.2707. CNPI notes that in previous stages of this proceeding the rate rider in the tariff that is automatically produced in Sheet 19 of the IRM Model needed to be manually adjusted to reflect CNPI's proposal for an extended disposition period.

Since the OEB's decision does not explicitly address CNPI's request for a 48-month disposition for its Street Lighting rate class, CNPI respectfully requests that the OEB confirm whether CNPI's proposed mitigation proposal is accepted. If the proposed mitigation is accepted, the following changes to CNPI's 2021 tariff are required:

- a) adjust the LRAMVA rate rider for CNPI's Street Lighting rate class to \$6.2707/kW;
- b) adjust the associated expiry date to December 31, 2024

CNPI has no comments on any other aspect of the Decision, and confirms that all other rates are accurate.

Sincerely,

Greg Beharriell, P.Eng.  
Manager, Regulatory Affairs

cc: Mark Rubenstein, Jay Shepherd, Wayne McNally (SEC)  
Shelley Grice, John Lawford (VECC)  
Marc Abramovitz, Richard Lanni (OEB Staff)