



2021 IRM APPLICATION

EB-2020-0049

Submitted on: December 23rd, 2020

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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 Ottawa River Power Corporation to the Ontario Energy Board for an Order or Orders approving or fixing just and reasonable distribution rates and other service charges to be effective
May 1, 2021.

1. Applicant

NAME: Ottawa River Power Corporation

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2. Application

Ottawa River Power Corporation (“ORPC”) hereby applies to the Ontario Energy Board (the “Board”) for approval of its 2021 Distribution Rate Adjustments effective May 1, 2021. ORPC applies for an Order or Orders approving the proposed distribution rates and other charges as set out in Appendix B of this Application as just and reasonable rates and charges pursuant to Section 78 of the OEB Act.

Ottawa River Power Corporation has followed Chapter 3 of the Board’s Filing Requirements for Transmission and Distribution Applications dated July 12, 2018 along with the Key References listed at Chapter 3 Incentive Rate-Setting Applications.

ORPC confirms that the billing determinants used in the model are from most recent reported RRR filings. The utility reviewed both the existing “Tariff Sheets” and billing determinants in the pre-populated worksheets and confirms that they are accurate.

In the preparation of this application, ORPC used the 2021 IRM Rate Generator issued on October 19th, 2020. The rate and other adjustments being applied for and as calculated through the use of the above models include a Price Cap Incentive Rate-Setting (“Price Cap IR”) option to adjust its 2021 rates (The Price Cap IR methodology provides for a mechanistic and formulaic adjustment to distribution rates and charges in the period between Cost of Service applications). The model also adjusts Retail Transmission Service Rates in accordance with Board Guideline G-2008-0001 - Electricity Distribution Retail Transmission Service Rates revised on June 28, 2012.

Along with revisions to its distribution rates, Ottawa River Power also seeks approval of the following matters:

- Continuance of the Specific Services charges and Loss Factors;
- Continuance of the MicroFit monthly charge;
- Continuance of the Smart Meter Entity charge;
- Continuance of the Rate Rider for Recovery of Incremental Capital Module;
- Final disposition of 2017 balances in Accounts 1550, 1551, 1580, 1584 and 1586; and
- Disposition of Group 1 Variance Accounts excluding 1588 Power and 1589 Global Adjustment as the latter are currently being audited by the OEB Compliance division.

3. Excess Dead-Band Earnings

Ottawa River Power Corporation is seeking an adjustment to its base rates through Price Cap IR although it achieved a Regulatory Return on Equity of 14.48% in 2019 which is 229 basis above the dead-band of 12.19%.

As indicated in its Annual RRR filing under section 2.1.5.6, 2019 revenues included \$267,813.80 for the Historical Smart Meter Costs. Excluding these revenues, the Regulatory Return on Equity would be 9.33% compared to the deemed Return on Equity of 9.19% which is well within the dead-band of +/- 3%. The Historical Smart Meter Cost rate was effective until June 30th, 2020 and is no longer in effect.

Ottawa River Power Corporation therefore finds it reasonable to request an adjustment to its base rates despite excess earnings beyond the dead band of 12.19%.

4. Scope of Application

The Scope of this application under the Incentive Rate-Setting Mechanism for the 2021 rate year includes:

- 2021 IRM Rate Generator
- 2021 GA Analysis Work Form
- Proposed 2021 Tariff of Rates and Charges
- Customer Bill Impacts

5. Current Tariff Sheets

The Tariff of Rate and Charges for rates currently in effect are presented in Appendix A.

6. Proposed Tariff Sheets

The Tariff of Rates and Charges proposed in this Application are presented in Appendix B.

7. Effective Date

Ottawa River Power Corporation requests an effective of May 1, 2021 for the Proposed Tariff of Rates and Charges.

In the event that the Board is unable to provide a Decision and Order in this Application for implementation by the Applicant as of May 1, 2021, ORPC requests that the Board issue an Interim Rate Order declaring the current Distribution Rates and Specific Service Charges as interim until the decided implementation date of the approved 2021 distribution rates. If the effective date does not coincide with the Board's decided implementation date for 2021 distribution rates and charges, Ottawa River Power requests to be permitted to recover the incremental revenue from the effective date to the implementation date.

8. Form of Hearing Request

ORPC requests pursuant to Section 34.01 of the Board's Rules of Practice and Procedure that this application be disposed of by way of a written hearing.

9. Notice of Application

Ottawa River Power attests that the utility, its shareholders and all its customer classes will be affected by the outcome of this application. ORPC will make the application and the evidence, and any amendments thereto, available for public review at Ottawa River Power Corporation's office and in a prominent place on Ottawa River Power Corporation's website at www.orpowercorp.com pending OEB direction.

10. Company Profile

Ottawa River Power Corporation serves the urban communities of the City of Pembroke, the Township of Whitewater (Beachburg only), the Town of Mississippi Mills (Almonte Ward only) and the Township of Killaloe, Hagarty & Richards (Killaloe only). Three exceptions to this geographic description are located in the Town of Mississippi Mills. During 2008 Ottawa River Power Corporation applied to the Ontario Energy Board to have its service area amended to include the west half of Lot 14 in the Township of Ramsey. This amendment was granted by the OEB under order EB-2008-0094. During 2009 ORPC applied to the OEB for another service area amendment in the Town of Mississippi Mills. In June 2009 the OEB amended the service area of ORPC under order EB-2009-0019 to include Phase 1 of Sadler Estates Development (Part of Lot 16, Conc. 10). In 2015, the OEB amended the Almonte area to include the property of Orchard View on 219 Patterson Street, East Part of Lot 14, Concession 10, Almonte Ward, now in the Town of Mississippi Mills (EB-2015-0153).

ORPC has 510 kilometers of lines comprised of 366 kilometers of overhead lines and 144 kilometers of underground lines. ORPC's distribution plant includes twelve substations: nine at 4.16 KV and three at 12.4 KV. Eight substations are located in the City of Pembroke and four substations are located in the Town of Mississippi Mills. Ottawa River Power Corporation has 14 sub-transmission transformers and approximately 1600 distribution transformers.

At the end of 2019, Ottawa River Power had approximately 11,300 customers comprised of 87% residential customers and 13% commercial customers including small businesses and industry. The balance of the utility's customer base is comprised of Sentinel Lighting, Street Lights and Unmetered Scattered Load.

Ottawa River Power has no customers designated as wholesale market participants. Effective July 1st, 2019, the corporation had 1 Class A customer.

Ottawa River Power last filed for a Cost of Service application in 2015 for rates that became effective on July 1, 2016 (EB-2014-0195) and is anticipating filing its next Cost of Service application in August 2021 for rates effective May 1, 2022.

11. Price Cap Adjustment

As per Board policy (Chapter 3), distribution rates are to be adjusted according to the Price Cap model presented through the Board's Rate Generator model. The calculation would be based on the annual percentage change in the GDP-IPI index.

In accordance with the Report of the Board: Rate Setting Parameters and Benchmarking under the Renewed Regulatory Framework for Ontario's Electricity Distributors, Ottawa River Power Corporation has used an assigned Stretch Factor Group II to calculate its Price Cap. The following table shows ORPC's factor to its Price Cap Adjustment.

Price Cap Parameters

Stretch Factor Group	II
Price Escalator	2.20%
Stretch Factor Value	0.15%
Productivity Factor	0.00%
Price Cap Index	2.05%

While the price factor adjustment under this application would apply to the fixed and volumetric distribution rates for Ottawa River Power, it would not affect the following:

- Rate adders and riders
- Low voltage service charges
- Retail Transmission Service Rates
- Wholesale Market Service Rate
- Rural Rate Protection Charge
- Standard Supply Service – Administrative Charge
- MicroFIT Service Charge
- Specific Service Charges
- Transformation and Primary Metering Allowances
- Smart Metering Entity Charge

- Rate rider for recovery of Incremental Capital Module

12. Revenue to Cost Ratio Adjustments

Ottawa River Power is not proposing to adjust its revenue to cost ratios in this proceeding as its revenue to cost ratios were adjusted and set as part of the 2015 Cost of Service application and will be reset in its next Cost of Service application.

13. Rate Design for Residential Electricity Customers

In accordance with the new Rate Design for Residential Electricity policy issued on April 2, 2015, Ottawa River Power implemented the final transition of five yearly adjustments to its Monthly Fixed Charge for the residential customer class in its previous IRM filed for rates effective May 1st, 2020. Therefore, no further transition is required through this application.

14. RTSR Adjustments

Ottawa River Power is applying for an adjustment of its Retail Transmission Service Rates (RTSR) based on a comparison of historical transmission costs adjusted for new UTR levels and revenues generated from existing RTSRs. This approach is expected to minimize variances in the USoA Accounts 1584 and 1586.

OPRC used the RTSR Adjustment Worksheets embedded in the IRM Model, to determine the proposed adjustments to the RTSR approved in the 2021 IRM application. The Loss Factor applied to the metered kWh is the actual Board-approved 2016 Loss Factor.

The proposed adjustments of the RTSR are shown in the table below and the detailed calculations can be found in the 2021 IRM Model filed in conjunction with this application.

Proposed Network Service Rate

Rate Class	Unit	Current Network Service Rate	Proposed Network Service Rate
Residential Service	\$/kWh	0.0060	0.0059
General Service Less Than 50 kW Service	\$/kWh	0.0053	0.0052
General Service 50 To 4,999 kW Service	\$/kW	2.2135	2.1773
Sentinel Lighting Service	\$/kW	1.6776	1.6502
Street Lighting Service	\$/kW	1.6693	1.6420
Unmetered Scattered Load Service	\$/kWh	0.0053	0.0052

Proposed Line and Transformation Connection Service Rate

Rate Class	Unit	Current Line and Connection Service Rate	Proposed Line and Connection Service Rate
Residential Service	\$/kWh	0.0050	0.0050
General Service Less Than 50 kW Service	\$/kWh	0.0044	0.0044
General Service 50 To 4,999 kW Service	\$/kW	1.7725	1.7860
Sentinel Lighting Service	\$/kWh	1.3993	1.4099
Street Lighting Service	\$/kW	1.3704	1.3808
Unmetered Scattered Load Service	\$/kW	0.0044	0.0044

15. Deferral and Variance Account Continuity Schedule

Ottawa River Power Corporation has completed the Board Staff's 2021 IRM Rate Generator – Tab 3 2019 Continuity Schedule and the threshold test at Tab 4 shows a claim per kWh of \$0.0016. The Report of Board on Electricity Distributors' Deferral and Variance Account Review Report (the "EDDVAR Report") provides that during the IRM plan term, the distributor's Group 1 audited account balances will be reviewed and disposed if the pre-set disposition threshold of \$0.001 per kWh (debit or credit) is exceeded unless otherwise elected by the distributor. This amount does exceed the threshold and Ottawa River Power is requesting disposition of Group 1 accounts excluding accounts 1588 and 1589.

The DVA Continuity schedule for accounts 1550, 1584 and 1586 includes principal adjustments to reverse 2018 principal adjustments. The 2018 principal adjustments relate to a Hydro One billing adjustment performed in 2019 after the completion of the year end audit. In August of 2019, Hydro One and ORPC became aware of errors in the monthly Hydro One billings to ORPC. All bills for usage months between December 2017 and May 2019 were reviewed and subsequently canceled and re-billed as a result of a formula error in the calculation of the usage for Retail Transmission Network, Line and Connection charges. Since the error was uncovered subsequent to the audit and finalization of the financial statements and the Annual RRR filing for 2018, the entire adjustment was included in 2019. As a result, principal adjustments relating to 2018 usage months of \$(326,417) and \$(260,251) were required for RSVA – Retail Transmission Network Charges and RSVA – Retail Transmission Connection Charges respectively. A minor principal adjustment of \$(2,621) also occurred in the Low Voltage Variance Account as a result of the error. Evidence regarding this adjustment was provided in ORPC's previous IRM. Analyses of balances in accounts 1550, 1551, 1580, 1584 and 1586 were presented through Appendices C, D, E, F and G.

For accounts 1588 and 1589, Ottawa River Power is not requesting disposition at this time due to an ongoing audit inquiry with the Ontario Energy Board around these accounts. The audit and any adjustments are expected to take a significant amount of time to complete and therefore are not presented in this IRM. The 2019 principal adjustments for accounts 1588 and 1589 are entries to clear

the balances to zero for the purpose of excluding the balances in the rate rider calculation starting in Tab 4. A request was sent to ratemodels@oeb.ca to modify the calculation to automatically exclude balances in 1588 and 1589 but the request was not addressed by the time ORPC intended to file.

All interest recorded on carrying charges are calculated using simple interest applied to the monthly balance and are recorded in separate sub-accounts.

16.RSVA Power – Account 1588

Ottawa River Power Corporation's (ORPC) Account 1588 is composed of electricity purchased from Hydro One, embedded generators and Microfits and energy revenue from the customer for each class of customer.

Electricity from Hydro One and Brookfield is purchased at the spot rate whereas electricity purchased from the Mississippi River Power Corporation (MRPC) and Enerdu Power Systems embedded generators and Microfits is purchased at contracted rates. All purchases are recorded in Account 4705. ORPC records the difference between the contracted rates and the weighted average price on any amounts paid to MRPC, Enerdu and Microfits from Hydro One on each of its monthly settlement with Hydro One and these recoveries are recorded in Account 4705.

Customers are charged at time-of-use, weighted average (WAP) or the Hourley Ontario Energy Price (HOEP) and the charges are recorded in Account 4006, 4010, 4015, 4025, 4030 or 4035. The weighted average rate is calculated based on the HOEP multiplied by the Net System load for the given hour. On each settlement with Hydro One, the WAP data is extracted from the customer information system. The dollar amount of WAP charged to each customer class is then allocated between the RPP Blocks and time-of-use pricing based on consumption in each class. The difference between the price charged to the customer and the WAP represents the global adjustment portion of RPP prices which is reported in ORPC's Hydro One settlement. Items remaining in Account 1588 include differences between the hourly weighted average price paid for electricity and the billing period weighted average price charged to customers and differences between actual line losses as compared to the total loss factor.

Ottawa River Power Corporation is currently undergoing an audit by the Ontario Energy Board compliance division for accounts 1588 and 1589. The company projects that principal adjustments will be required to balances between 2015 and 2019 but the adjustments have not been quantified at this time. Therefore, no principal adjustments are outlined for accounts 1588 and 1589 on the continuity schedule for 2019. Due to the ongoing nature of the audit, Ottawa River Power Corporation believes that it is not appropriate at this time to request final disposition of 2017 1588 and 1589 balances nor is it appropriate to request disposition of 2019 balances in accounts 1588 and 1589.

17.RSVA Global Adjustment – Account 1589

ORPC had 1 Class A customer as of July 1st, 2019. This account is reviewed annually for eligibility and annual adjustments to the power factor are communicated to the customer. For its Class B customers, ORPC reviews the general service accounts on an annual basis to determine which customers are eligible for the RPP. Accounts are also reviewed at the time that an account changes ownership. Any billing adjustments are done as part of the next billing period.

ORPC uses the Global Adjustment 1st estimate rate posted on the IESO website for the settlement month. The variance between the estimate and the actual GA rate is recorded and reflected in RSVA GA 1589 on a monthly basis.

Ottawa River Power Corporation's (ORPC) account 1589 is composed of the Global Adjustment (GA) paid to Hydro One, the GA received on the generator payment from Hydro One and the GA charged to customers.

All GA paid on electricity provided from Hydro One is recorded in Account 4707. When ORPC settles with Hydro One for GA purposes, the billed kWhrs in a given month are extracted from the customer information system and the RPP data is subtracted to obtain the non-RPP volume related to billed GA. The volume obtained is multiplied by the GA actual rate for the applicable usage month to calculate the actual value of the GA that would have been charged to customers had the actual GA rate for the month been used. The actual GA value for the month is then compared against the GA

paid on the applicable month's Hydro One bill and the difference is submitted for reimbursement to Hydro One by the 2nd business day after the settlement month. ORPC also estimates usage and GA rates for any unbilled kWhs.

ORPC also receives a monthly generator payment from Hydro One for all electricity, if any, that was over-generated by Mississippi River Power Corporation – an embedded generator – directly into the Hydro One grid. The GA credit received on the generator payment is recorded into Account 4707. The value of the RPP GA to be settled with Hydro One is then reduced by the GA credit received on the generator payment.

ORPC customers are charged based on the 1st estimate of the GA.

In regards to the 2021 proceeding, as mentioned above Ottawa River Power Corporation is currently undergoing an audit by the Ontario Energy Board compliance division for accounts 1588 and 1589. The company projects that principal adjustments will be required to balances between 2015 and 2019 but the adjustments have not been quantified at this time. Therefore, no principal adjustments relating to Account 1588 and 1589 are presented on the continuity schedule for 2019. Due to the ongoing nature of the audit, Ottawa River Power Corporation believes that it is not appropriate at this time to request final disposition of 2017 balances nor is it appropriate to request disposition of 2019 balances in accounts 1588 and 1589.

18. Adjustments to Deferral and Variance Accounts

In its rate application for rates effective May 1st, 2019, Ottawa River Power Corporation applied for a disposition of Group 1 Deferral and Variance Accounts and was approved for disposition on an interim basis. As noted above, Ottawa River Power Corporation is currently undergoing a review of accounts 1588 and 1589 with the Ontario Energy Board. The company projects that adjustments will be required to these accounts from 2015 through 2019 but the adjustments have not been quantified at this time due to the ongoing nature of the audit. However, no adjustments are required to the remaining Group 1 accounts that were disposed at the time. The company is therefore requesting that the balances disposed up to December 31st, 2017 for accounts 1588 and 1589 remain on an interim basis until the

review with the Ontario Energy has been complete and that balances disposed up to December 31st, 2017 for accounts 1550, 1551, 1580, 1584, 1586 and 1595 (2013) be disposed on a final basis.

19. Deferral and Variance Account Disposition Rate Riders

Ottawa River Power Corporation is proposing the following rate riders in regards to disposition of accounts 1550, 1551, 1580, 1584 and 1586:

Proposed Deferral/Variance Account Rate Rider

Rate Class	Unit	Proposed Rate Rider
Residential Service	\$/kWh	0.0016
General Service Less Than 50 kW Service	\$/kWh	0.0017
General Service 50 To 4,999 kW Service	\$/kW	0.5191
Sentinel Lighting Service	\$/kWh	0.0017
Street Lighting Service	\$/kW	0.5884
Unmetered Scattered Load Service	\$/kW	0.0017

Due to the low impact of the rate rider, Ottawa River Power Corporation is proposing a 12-month recovery period for this rate rider.

20. Implementation of new 1588 and 1589

Ottawa River Power Corporation is currently undergoing a review with the Ontario Energy Board for accounts 1588 and 1589 and cannot confirm its compliance with guidance from the OEB issued on February 21, 2019 at this time. Prior to the audit, Ottawa River Power believed that it had fully implemented the guidance. In regards to 2017 historical balances yet to be disposed of on a final basis, Ottawa River Power has considered the impact of this guidance on the balances. Ottawa River Power Corporation is anticipating adjustments to accounts 1588 and 1589 once the OEB review is finalized.

21. Specific Service Charge and Loss Factors

Ottawa River Power Corporation is applying to continue the current Specific Service Charges, and Loss Factors as approved by the Board (EB-2014-0165).

22. Disposition of LRAMVA

On March 31, 2010, the Minister of Energy and Infrastructure issued a directive (the "Directive") to the Board regarding electricity CDM targets to be met by licensed electricity distributors. The Directive required that the Board amend the licenses of distributors to add, as a condition of license, the requirement for distributors to achieve reductions in electricity demand through the delivery of CDM programs over a four-year period beginning January 1, 2011. Section 12 of the Directive required that the Board have regard to the objective that lost revenues that result from CDM Programs should not act as a disincentive to a distributor. On April 26, 2012, the Board issued Guidelines for Electricity Distributor Conservation and Demand Management ("CDM Guidelines"). In keeping with the Directive, the Board adopted a mechanism to capture the difference between the results of actual, verified impacts of authorized CDM activities undertaken by distributors between 2011 and 2014 and the level of activities embedded into rates through the distributors load forecast in an LRAM variance account.

In accordance with the Board's Guidelines for Electricity Distributor Conservation and Demand Management (EB-2012-0003) issued on April 26, 2012, at a minimum, distributors must apply for disposition of the balance in the LRAMVA at the time of their Cost of Service rate applications. Distributors may apply for the disposition of the balance in the LRAMVA on IRM rate applications if the balance is deemed significant by the applicant.

Ottawa River Power disposed of the balance of 1568 up to 2014 in its Cost of Service application implemented in July 2016. As such ORPC is not seeking further disposition with this application.

23. Tax Change

The IRM model indicates that the utility is subject to a tax rate change from its Cost of Service application in 2016 to the 2021 rate. The model indicates a tax sharing amount of \$(4,679) which did not provide a rate rider in any of the rate classes based on the allocated tax sharing. As such, per Filing Requirements and pending approval by the OEB of this proceeding, ORPC will transfer the tax sharing amount into account 1595 for disposition at a later date.

24. ICM / Z-Factor

ORPC is not applying for any new recovery of Incremental Capital or Z-Factor in this proceeding. However, ORPC is seeking approval to continue the rate rider for recovery of Incremental Capital Module that was approved by the OEB in the 2019 proceeding. This rate is to be in effect until the next Cost of Service-based rate order. ORPC is currently anticipating filing its next Cost of Service in August 2021 for rates effective May 1, 2022 and a more detailed review of this rate rider will be included in the Cost of Service submission.

25. Global Adjustment Analysis Work Form

Ottawa River Power Corporation has completed the Global Adjustment (GA) analysis work form for 2019. ORPC received approval for interim disposition of the Global Adjustment account up to December 31, 2017, however the corporation is undergoing a review of account 1589 with the Ontario Energy Board and projects that adjustments will be required to 2015 through 2019. Therefore, the company has included 2015, 2016, 2017, 2018 and 2019 in its analyses but has not adjusted any principal adjustments at the moment due to the ongoing nature of the audit. The form calculates the expected GA variance between billed consumption and consumption adjusted for unbilled revenues. The total expected variance is then reconciled against the changes in the general ledger. ORPC did not present any reconciling items for 2019 due to the ongoing nature of the audit. Without any adjustments, the unresolved remaining difference is 1.0% which is within the 1% maximum threshold therefore no further explanation is required.

26.1595 Analysis Work Form

Per the Chapter 3 Filing Requirements, distributors who meet the requirements for disposition of residual balances of Account 1595 sub-accounts must file the 1595 Analysis Work Form to assess if the residual balances proposed for disposition are reasonable. ORPC is not currently seeking disposition of residual balances of Account 1595 sub-accounts as the 2016 rate rider, which ended on June 30, 2018, is not eligible for disposition until December 31, 2020 account balances have been audited. Due to this, the 1595 work form was not included as part of this submission.

27. Wholesale Market Charge Account 1580

Ottawa River Power Corporation is an embedded distributor and is not charged CBR for its Class B customers. Ottawa River Power Corporation is charged CBR for its Class A customer as of July 1, 2019 but no balance pertaining to this customer exists in account 1580 at December 31, 2019.

28. Bill Impacts

The table below shows the proposed bill impacts as calculated at Sheet 20 of the model.

Bill Impacts by Sub-Total

Table 2

RATE CLASSES / CATEGORIES (eg: Residential TOU, Residential Retailer)	Units	Sub-Total					
		A		B		C	
		\$	%	\$	%	\$	%
RESIDENTIAL SERVICE CLASSIFICATION - RPP	kWh	\$ 0.49	2.0%	\$ 1.69	5.5%	\$ 1.61	4.1%
GENERAL SERVICE LESS THAN 50 kW SERVICE CLASSIFICATION - RPP	kWh	\$ 1.08	2.1%	\$ 4.48	6.9%	\$ 4.27	5.0%
GENERAL SERVICE 50 to 4,999 kW SERVICE CLASSIFICATION - Non-RPP (Other)	kW	\$ 9.22	2.0%	\$ 61.13	12.4%	\$ 58.86	6.6%
SENTINEL LIGHTING SERVICE CLASSIFICATION - Non-RPP (Other)	kWh	\$ 0.19	2.1%	\$ 0.19	1.9%	\$ 0.18	1.3%
STREET LIGHTING SERVICE CLASSIFICATION - Non-RPP (Other)	kW	\$ 48.42	2.1%	\$ 151.39	6.3%	\$ 148.43	5.1%
UNMETERED SCATTERED LOAD SERVICE CLASSIFICATION - RPP	kWh	\$ 0.27	2.8%	\$ 4.84	17.3%	\$ 4.56	8.3%
RESIDENTIAL SERVICE CLASSIFICATION - Non-RPP (Retailer)	kWh	\$ 0.49	2.0%	\$ 1.69	5.5%	\$ 1.61	4.1%
RESIDENTIAL SERVICE CLASSIFICATION - RPP	kWh	\$ 0.49	2.0%	\$ 0.94	3.4%	\$ 0.91	3.0%
GENERAL SERVICE 50 to 4,999 kW SERVICE CLASSIFICATION - Non-RPP (Other)	kW	\$ 9.22	2.0%	\$ 61.13	12.4%	\$ 61.13	12.4%

The 10th percentile was calculated in the following manner

- 1) The utility produced a report which included *Residential Customer Number* and their *Monthly Consumptions*.
- 2) The report was then sorted by lowest to highest consumption.
- 3) The utility then calculates the 10th percentile threshold as being 283 kWh.
- 4) The report filtered out customers that had less than 12 months of consumption and those that used less than 50 kWh per month.

As per instructed by Board Staff, the bill impacts presented are calculated based on the *dollar change in Sub-Total C – Delivery* divided by *total bill before tax and before the Ontario Energy Rebate*.

With the exception of the Residential and GS<50 which use the typical 750 and 2000 kWh/month respectively, the other classes were calculated using a monthly average consumption.

Ottawa River Power Corporation has completed the transition to fully fixed residential distribution service rates and therefore a 10th percentile calculation and mitigation plan is not required. However, the 10th percentile was still presented for comparative purposes.

29.Certification

In accordance with filing requirements for Electricity Distribution Rate Applications, I hereby certify that, to the best of my knowledge, the information and evidence contained in this application are accurate, complete and consistent with filing requirements. I also certify that Ottawa River Power Corporation has robust processes and internal controls in place for the preparation, review, verification and oversight of all account balances being requested for disposition.



Jeffrey Roy

Chief Financial Officer

Ottawa River Power Corporation

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The following are appended to and form part of this Application

Appendix A	Current Tariff Sheet
Appendix B	Proposed Tariff Sheet
Appendix C	Account 1550 Balance Analysis
Appendix D	Account 1580 Balance Analysis
Appendix E	Account 1584 Balance Analysis
Appendix F	Account 1586 Balance Analysis
Appendix G	Account 1551 Balance Analysis