

## **Fort Frances Power Corporation (Fort Frances Power)**

### **OEB Staff Questions- Round 2**

#### **2021 IRM Application**

**EB-2020-0023**

**January 29<sup>th</sup>, 2021**

Please note, Fort Frances Power is responsible for ensuring that all documents it files with the OEB, including responses to OEB staff questions and any other supporting documentation, do not include personal information (as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*), unless filed in accordance with rule 9A of the OEB's *Rules of Practice and Procedure*.

#### **OEB Staff- 9**

**Reference:** (i) Response to OEB Staff 2-b

The LRAMVA balance in this application includes incremental lost revenues from the delivery of 2013 to 2017 CDM programs, and the persistence of these savings into 2018. As a result of updating the savings claimed to match the IESO Final Verified Results Report, it reduced the LRAMVA balance from \$49,398 to a revised balance of \$48,208. Please confirm accuracy of the above statements.

FFPC confirms that the above statements are accurate.

#### **OEB Staff- 10**

**Reference:** (i) Response to OEB Staff 2-a

Please confirm Fort Frances Power is forgoing the recovery of 2018 incremental savings in the LRAMVA balance.

FFPC confirms it is forgoing the recovery of 2018 incremental savings and intends this to be the only LRAMVA application with no further tracking of incremental savings.

#### **OEB Staff- 11**

**Reference:** (i) Response to OEB Staff 3-d

The impact of street lighting demand savings comes from the 86% allocation of demand savings from the 2013 retrofit program, although Fort Frances Power noted that its street lighting upgrade projects were undertaken in 2014. Please clarify how the 86% allocation is derived.

FFPC confirms that the project was completed in 2013 and notes that there was a typo in the response to the 1st round of OEB questions. The allocation was derived using verified savings for Retrofit less other projects to calculate streetlighting divided by verified total savings.

## OEB Staff- 12

**Reference:** (i) Response to OEB Staff 4-b

Fort Frances Power is seeking to dispose of its entire LRAMVA balance over a 2-year period to mitigate rate impacts, specifically to the street lighting class. A 2-year disposition period would lower the bill impact associated with the street lighting class to an increase of about 14%. Although the LRAMVA balance would also be recovered over 2 years from other customer classes, the bill increase associated with all other customers is less than 1%.

- a. Please discuss whether Fort Frances Power has consulted with the Town of Fort Frances, who is ultimately responsible for amounts allocated to the street lighting rate class, on the bill impacts from disposing the LRAMVA, including the impacts of different recovery periods.

FFPC has consulted with the Town of Fort Frances regarding the disposition and rate impacts of the different recovery periods.

- b. If so, please discuss whether the Town of Fort Frances would accept the impact of the LRAMVA balance to be recovered over one year, rather than two.

Of the two recovery period options provided, the Town would prefer the longer two-year recovery period.

- c. Please indicate what Fort Frances Power's position would be with regard to the notion of disposing only the LRAMVA balance allocated to the street lighting rate class over a two-year period, while all other LRAMVA balances are recovered over a one-year period.

FFPC recognizes that the rate impact on the Street Lighting Customer class is significantly higher than the impact on any other customer class. FFPC believes that implementing a two-year recovery period for this customer class and a one-year recovery period for all other rate classes is appropriate.

## OEB Staff- 13

**Reference:** (i) LRAMVA Workform, Tab 1

OEB staff made some edits to the first tab of the LRAMVA Workform to align the LRAMVA request with the clarifications provided in response to Staff-2. Please confirm that Fort Frances Power is in agreement with the changes in Tab 1 (sections A and B) of the attached LRAMVA Workform, as highlighted in orange.

FFPC confirms it is in agreement.

**OEB Staff- 14**

**Reference:** (i) IRM Rate Generator Model, Tab 3 and 4

OEB Staff has updated cell BQ25 on Tab 3 of the Rate Generator Model as per Fort Frances Power's response to OEB Staff 1-a. OEB staff has also updated the rate class LRAMVA balance in Tab 4 of the Rate Generator Model in accordance with the balances shown in the LRAMVA Workform. Please confirm that Fort Frances Power is in agreement with the update to Tab 3 and the rate class amounts entered in Tab 4 of the Rate Generator Model.

FFPC confirms it is in agreement.