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May 28, 2021

Delivered by Email & RESS

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

Dear Ms. Long:

**Re: 2021 Cost of Service Rate Application
North Bay Hydro Distribution Limited (“NBHDL”)
OEB File No.: EB-2020-0043
Evidence Update**

As set out in the Settlement Proposal filed by NBHDL on May 14, 2021, within 14 days after filing the settlement proposal NBHDL may file an update to the evidence consisting of additional compensation benchmarking information (the “Evidence Update”).

In NBHDL’s pre-filed evidence at Exhibit 4, Table 4-2, NBHDL had provided a benchmarking table comparing its OM&A against various peer LDCs.

Specifically, Table 4-2 provided the number of customers, OM&A per customer and customers per km of line, for various peer LDCs for years 2017, 2018 and 2019.

In the Evidence Update, NBHDL provides a more granular and sophisticated level of benchmarking with additional comparators. Please find attached a live Excel spreadsheet containing compensation benchmarking information against NBHDL’s peer LDCs.

Similar to Table 4-2, the Evidence Update spreadsheet contains number of customers, OM&A and total circuit km of line for each LDC. However, in order to provide a more fulsome benchmarking comparison, NBHDL has now provided additional information that was not included in Table 4-2, as follows:

- Additional peer LDCs to assist the OEB panel in understanding how NBHDL compares against a greater pool of its LDC peers;

- Additional comparators such as region, cost of service year, FTEs, net PP&E, PEG model grouping, etc. to allow for considerations of factors such as geographical area and size of utility; and
- Pinpoint references to the source of information for each comparator to provide ease of reference and further clarity on how information was obtained.

The Evidence Update is intended to be of assistance to the OEB and the parties in regards to Issue 1.2 of the approved issues list.¹ NBHDL believes that through the Evidence Update, it is providing additional, helpful, and relevant benchmarking information for the OEB panel to consider. With this improved benchmarking information, the OEB panel would be able to perform a more meaningful benchmarking comparison than it could have using the information that was originally filed in Table 4.2.

Yours very truly,

BORDEN LADNER GERVAIS LLP

Per:

A handwritten signature in cursive script, appearing to read 'Flora Ho', written in black ink.

Flora Ho

cc: Intervenor of record in EB-2020-0043

¹ EB-2020-0043 - Decision on Issues List dated April 19, 2021.