



September 16, 2021

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

Dear Ms. Long:

Re: Grimsby Power Inc. (Grimsby Power)

Application for 2022 Electricity Distribution Rates Ontario Energy Board File Number: EB-2021-0027

In accordance with Procedural Order No. 1, OEB staff advises the OEB that parties have come to an agreement regarding an issues list for Grimsby Power's 2022 distribution rate application. The proposed issues list is attached.

Further, parties are requesting that the OEB waive the requirement under rule 26.02(e)(ii) of the Rules of Practice and Procedure that the interrogatories correspond to the issues list. Parties are requesting that they may file interrogatories according to the exhibit numbers in the application. Parties believe this approach is more efficient and likely less costly.

OEB staff also advises that parties indicated that, given that the current issues list was prepared prior to the interrogatory process, parties may wish to raise additional matters for inclusion on the Issues List after the responses to the interrogatories are received.

Yours truly,

Shuo Zhang

Project Advisor – Electricity Distribution: Major Rate Applications & Consolidations

Attach.

PROPOSED ISSUES LIST EB-2021-0027

Grimsby Power Incorporated (Grimsby Power)

1.0 PLANNING

1.1 Capital

Is the level of planned capital expenditures appropriate and is the rationale for planning and pacing choices appropriate and adequately explained, giving due consideration to:

- > customer feedback and preferences
- > productivity
- benchmarking of costs
- reliability and service quality
- impact on distribution rates
- trade-offs with OM&A spending
- government-mandated obligations
- the objectives of Grimsby Power and its customers
- the distribution system plan
- > the business plan

1.2 OM&A

Is the level of planned OM&A expenditures appropriate and is the rationale for planning choices appropriate and adequately explained, giving due consideration to:

- customer feedback and preferences
- productivity
- benchmarking of costs
- > reliability and service quality
- impact on distribution rates
- trade-offs with capital spending
- government-mandated obligations
- the objectives of Grimsby Power and its customers
- the distribution system plan
- > the business plan

2.0 REVENUE REQUIREMENT

2.1 Are all elements of the revenue requirement reasonable, and have they been appropriately determined in accordance with OEB policies and practices?

2.2 Has the revenue requirement been accurately determined based on these elements?

3.0 LOAD FORECAST, COST ALLOCATION AND RATE DESIGN

- **3.1** Are the proposed load and customer forecast, loss factors, and resulting billing determinants appropriate, and, to the extent applicable, are they an appropriate reflection of the energy and demand requirements of Grimsby Power's customers?
- **3.2** Are the proposed cost allocation methodology, allocations, and revenue-to-cost ratios, appropriate?
- **3.3** Are Grimsby Power proposals, including the proposed fixed/variable splits, for rate design appropriate?
- **3.4** Are the proposed Retail Transmission Service Rates and Low Voltage rates appropriate?
- **3.5** Are the Specific Service Charges, Retail Service Charges, and Pole Attachment Charge appropriate?

4.0 ACCOUNTING

- **4.1** Have all impacts of any changes in accounting standards, policies, estimates and adjustments been properly identified and recorded, and is the rate-making treatment of each of these impacts appropriate?
- **4.2** Are Grimsby Power's proposals for deferral and variance accounts, including the balances in the existing accounts and their disposition, requests for discontinuation of accounts, and the continuation of existing accounts, appropriate?

5.0 OTHER

- **5.1** Is the proposed effective date (i.e. January 1, 2022) for 2022 rates appropriate?
- 5.2 Has Grimsby Power responded appropriately to the requirement to conduct an independent Asset Condition Assessment to be submitted as part of its next cost of service or Custom IR application as outlined in the approved EB-2015-0072 settlement proposal?
- **5.3** Has Grimsby Power responded appropriately to the requirement to monitor its operating performance and improvement in customer satisfaction and to report the

Grimsby Power Inc. EB-2021-0027 Proposed Issues List

results in its next rate application as outlined in the decision¹ in the EB-2015-0072 proceeding?

5.4 Are Grimsby Power's proposed modification to the definitions of the General Service < 50 kW and General Service 50 to 4,999 kW classes appropriate?

¹ EB-2015-0072, Decision and Order, August 18, 2016, page 7.