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Sept. 24, 2021

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

Dear Ms. Long,

RE: EB-2021-0110 – Submission of London Property Management Association – Need for Blue Page Update

In accordance with Procedural Order #1, dated Sept. 17, 2021, these are the submissions of the London Property Management Association (“LPMA”) with respect to the need for a blue page update. LPMA is not making any submissions with respect to the confidentiality request or on the provision for reply on expert evidence.

With respect to the need for a blue page update, LPMA submits that such an update is necessary and should be provided as soon as the actual data for 2021 has been finalized.

The need for the blue page update, in the view of LPMA, is based on the need to have the best starting point available for the calculation of rate base and all of the revenue requirement components associated with rate base, such as depreciation, cost of capital and income taxes. The need for an accurate starting point based on the most recent actual (2021) information is especially critical considering that rates for 2023 will be set on a cost of service basis which will then form the base for changes in the revenue requirement in 2024 through 2027.

The filing requirements for electricity transmitters states that “at a minimum, the filed material in support of the requested rate base must include data for the historical actuals, bridge year (actuals to date and balance of year as budgeted) and test year(s)”. (Filing Requirements for Electricity Transmission Applications, February 11, 2016, page 18). The bridge year is singular in this requirement, while the historical and test year can be singular or plural. Without a blue page update, there would be two bridge years, 2021 and 2022.

Another reason for the need for 2021 actuals that would be provided through a blue page update is the impact of COVID-19 on both the execution of the capital plan for 2021 and any impact that may have in 2022 (and beyond) and on OM&A costs that were either incurred or deferred as a result of the pandemic.

The provision of 2021 actuals for the load forecast may also provide useful information on the impact of COVID-19 in terms of load growth or contraction in 2021 as compared to 2020. This information may be useful in analyzing the load forecast for 2022 and beyond.

A blue page update would also provide parties with the audited final balances in of the deferral and variance accounts that are proposed to be disposed of as part of the application.

For all of the above reasons, LPMA submits that a blue page update should be required to be filed when available.

Yours very truly,

Randy Aiken
Aiken & Associates

cc. Hydro One Regulatory