

BY E-MAIL

October 25, 2021

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

Dear Ms. Long:

Re: Elexicon Energy Inc. (Elexicon) Application for 2022 Electricity Distribution Rates OEB Staff Interrogatories Ontario Energy Board File Number: EB-2021-0015

In accordance with Procedural Order No. 1, please find attached OEB staff's interrogatories in the above noted proceeding. Elexicon and all intervenors have been copied on this filing.

Elexicon's responses to interrogatories are due by November 8, 2021.

Yours truly,

Birgit M. Armstrong

Birgit Armstrong Project Advisor, Incentive Rate Setting & Regulatory Accounting

Attach.

Elexicon Energy Inc.

EB-2021-0015

OEB Staff Interrogatories

October 25, 2021

Please note, Elexicon Energy Inc. (Elexicon) is responsible for ensuring that all documents it files with the OEB, including responses to OEB staff interrogatories 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-1

Ref: Appendix B, pages 11-13

For the project alternatives, Elexicon considered building Seaton TS at site 2 (preferred option 1) and at site 3 (option 10).

- a) Why was site 1 not considered for a standalone option that involves only the construction of Seaton TS?
- b) Please discuss the pros/cons of site 1 compared to sites 2 and 3.
- c) What is the forecasted cost if Seaton TS is constructed at site 1?

OEB Staff-2

Ref: Appendix B, page 13

Regarding Seaton TS, option 10 is to construct Seaton TS at site 3. Option 7 involves constructing additional supply from Sheppard TS in addition to the construction of Seaton TS at site 3.

a) Although option 7 appears to involve broader scope (i.e. additional supply for Sheppard TS), it has a lower capital cost than option 10. Please explain why.

OEB Staff-3

Ref: Appendix B-2, page 15

Elexicon notes that it used a competitive procurement process for all major purchases on the Seaton TS project.

- a) Please provide further details on the procurement process including how Elexicon evaluated the quotes/bids it received.
- b) Has Elexicon done any benchmarking or comparison of the costs of the Seaton TS project? If so, please provide this information.
- c) What are Elexicon's processes for evaluating and approving any variance to project scope, schedule and cost?
- d) Is Elexicon's general contractor for this project responsible for any cost overruns? What steps have Elexicon taken to mitigate the risk of cost overruns and the resulting impact on rates to customers?

Ref: DSP, Appendix S-1, pages 8-12

As noted in the DSP, the 2016 IRRP forecasted that the Whitby TS 27.6kV LTR would be exceeded by 2018. However, as shown in Figure 10 on page 11, the actual loading of Whitby TS 27.6kV in 2019 was less than half of its LTR.

Furthermore, as noted on page 12, as of 2019, the large influx of customers from the Seaton Area has still not yet occurred as originally forecasted.

- a) When does Elexicon forecast the additional load from the Seaton area to materialize? At what point, if Seaton TS were not constructed, does Elexicon expect the LTR for Whitby TS' 27.6kV system to be exceeded?
- b) What is the current progress on the new residential developments in the Seaton area?

OEB Staff-5

Ref: GTA East – 2019-2024 Regional Instructure Plan, February 29, 2020, pages 23, 31

Ref: DSP, Appendix S-1, page 26

The 2019-2024 Regional Instructure Plan noted that "...Seaton MTS is under construction" and is forecasted to be in-service in 2021. This plan was released in 2020.

Elexicon's current DSP, dated April 1, 2021, notes that the land for Seaton TS is planned to be bought in 2021 but the start date to the project is unknown.

- a) Has construction commenced on Seaton TS? If so, when did it start?
- b) Please explain the reason for delaying the in-service of Seaton TS from 2021 to 2022.

In the DSP, regarding Seaton TS, Elexicon notes that: "The start date, expenditure timing, and in-service date are uncertain at this time."

- c) What is the current status of the Seaton TS project?
- d) What confidence does Elexicon have that Seaton TS can be placed in-service in 2022? Approximately when in 2022 does Elexicon expect to put Seaton TS inservice?
- e) Is there a risk register for this project? If so, please provide it.

OEB Staff-6

Ref: Appendix B, pages 6

Elexicon VRZ's 2022 net capital expenditures is significantly higher than historical years. Even if the \$40.8M cost of Seaton TS Is removed, Elexicon VRZ's 2022 net capital expenditures would be \$39.5M. This amount is \$12.0M (44%) higher than Elexicon VRZ's five-year historical average spending (2017-2021) of \$27.5M.

In particular, OEB staff notes that Elexicon VRZ's 2022 system renewal spending of \$21.2M is \$8.3M (64%) higher than the five-year historical average (2017-2021) of \$8.3M.

- a) Has Elexicon made any adjustments or deferrals to its capital spending in 2022 (particularly in system renewal) to help levelize or reduce the significant increase in 2022 capital spending?
- b) Please explain why Elexicon's system renewal budget is significantly higher in 2022 as compared to the historical average.

OEB Staff-7

Ref: Appendix B, pages 11-13

Elexicon's preferred option 1 for Seaton TS is to construct 12 feeders. By comparison, option 10 proposes to construct two initial feeders with two additional feeders installed every two years thereafter until there is a total of 8 feeders.

- a) Please explain why Elexicon is opting to construct four additional feeders under option 1 and why option 1 does not consider a staggered approach to adding new feeders like option 10.
- b) Please discuss why it is prudent to install 12 new feeders, particularly when new customers and load have not materialized in the Seaton area as originally forecasted.

Ref: DSP, Appendix S-1, page 6, 27

Seaton TS will be owned and operated by Elexicon. As noted in the DSP, this is a new venture with additional complexity due to this being the first transformer station exclusively owned by Elexicon.

- a) Was the option of a Hydro One Networks Inc. (HONI) owned transformer station considered? Why or why not?
- b) If a HONI owned transformer station was a possible option, please discuss how the benefits of an Elexicon owned transformer station outweigh the additional costs of operating and maintaining a transformer station.

OEB Staff-9

Ref: ICM Model, Tab 9b

Ref: Kinetrics' Asset Depreciation Study for the Ontario Energy Board, July 8, 2010

Under the line item "Seaton TS – Station Building", Elexicon has used a useful life of 25 years to calculate the amortization on this asset class.

a) Per the Kinetrics report, the range of useful lives for station buildings is 50-75 years. Please provide justification for the deviation from the report in useful life.

OEB Staff-10

Ref: Appendix B-1

The estimated net CAPEX for the BRT relocation project is \$3.38 million.

- a) Please explain how Elexicon created the estimate for this project.
- b) Has Elexicon benchmarked the costs of the relocation project against other similar sized projects? What steps has Elexicon taken to ensure that the amount of forecasted costs is appropriate?

OEB Staff-11 Ref: DSP, page 196, 206, 215

OEB staff notes that Elexicon has had similar, or in some cases larger, capital expenditures related to road relocations in historical years:

- Page 196 shows that Elexicon had \$23.05 million in road relocations in 2021 vs. \$5.54 million in 2022.
- Page 206 notes that Elexicon has an average historical spending of \$7.84 million on road relocations.
- Page 215 has a table which shows that, on a net basis, Elexicon spent \$3.87 million in 2021 on road relocations and is forecasted to spend \$3.59 million in 2022.
- a) Please explain the need for incremental capital funding for the BRT road relocation when this appears to be the only significant road relocation planned for 2022, and Elexicon has historically been able to fund similar or larger road relocation projects through base rates.

OEB Staff-12

Ref: Appendix B-1, page 13

The business case for the BRT relocation project notes that "the project start date, inservice date, and expenditure timing will be dictated by external requirements and are not known at this time."

- a) What is the current status/progress of this project?
- b) Please confirm that this project will be in-service in 2022 and provide the estimated in-service date.

OEB Staff-13

Ref: VRZ_2022 Rate Generator Model, tab 17 EB-2021-0015 Procedural Order No. 2

In PO#2 the OEB noted that it may find it necessary to bifurcate the incentive ratemaking aspects of Elexicon's application from the ICM funding requests.

a) Please provide a copy of an updated tariff sheet and rate generator model excluding the ICM-related components, in the event that the OEB ultimately finds it necessary to issue separate decisions on these matters.

OEB Staff-14 Ref: VRZ 2022 ACM_ICM_Model, Tab 9

The ICM model shows the following Net Capital Expenditures for the Seaton TS:

Seaton TS - Station Building	New ICM	\$ 5,411,988 \$ 8,749,825
Seaton TS - Switchgear Seaton TS - Station Equipment	New ICM New ICM	\$ 1,811,302 \$ 5,411,088
Seaton TS - Transformer	New ICM	\$ 23,388,885
Seaton TS - Land	New ICM	\$ 1,400,000

- a) Did Elexicon include any consultation cost related to the Seaton TS station project in the above listed net capital expenditures?
- b) If so, please provide the total capitalized cost for consultation, as well as segmented by key cost drivers.

OEB Staff-15 Ref: DSP, Appendix S-1, page 27

On page 27 of S-1 of the DSP, Elexicon noted that the environmental assessment is being done externally. OEB staff notes that an Environmental Study Report, dated August 2018, has been posted on Elexicon's <u>website</u>.

- a) Please confirm that the environmental assessment study has been completed.
- b) If so, please file the Notice of Completion on the record of this proceeding.

OEB Staff-16 Ref: VRZ Rate Generator Model, tab 6 Class A Consumption Date

OEB staff notes that Elexicon reversed the transition period between Class A and Class B customer, since O. Reg. 429/04 stipulates that customers can only transition between Class A and Class B on July 1 of each year.

	omers – Non-loss Adjusted Billing Determinants by Cu		2020		2019		2018	
Customer	Rate Class		July to December	January to June	July to December	January to June	July to December	January to June
Customer 1	GENERAL SERVICE 50 TO 2,999 KW SERVICE CLASSIFIC	kWh					4,140,807	668,073
		kW					8,448	1,800
		Class A/B	В	A	A	A	A	В
Customer 2	GENERAL SERVICE 50 TO 2,999 KW SERVICE CLASSIFIC	kWh	644,566	360,899	3.065.688	403,115	5,535,051	5.616.61
		kW	1.181	704	7.335	785	14.841	11.928
		Class A/B	В	В	В	В	A	В
Customer 3	GENERAL SERVICE 50 TO 2,999 KW SERVICE CLASSIFIC	kWh	1.846.859	1,956,472	2,004,350	1,740,657	2,029,510	2,104,75
		kW	4,554	5,197	4,804	4,498	4,706	5.019
		Class A/B		A	A	В	A	A
Customer 4	GENERAL SERVICE 50 TO 2,999 KW SERVICE CLASSIFIC	kWh		1,685,391	1,360,363	1,658,129	1,027,459	1,508,597
		kW	3,104	3,318	2.926	3,441	2.274	3,173
		Class A/B		A	A	B	A	A
Customer 5	GENERAL SERVICE 50 TO 2,999 KW SERVICE CLASSIFIC	kWh		4,091,027	2,819,219	3,929,422	2,947,399	4,087,973
		kW		7,626	5,316	7,743	5,882	7,900
		Class A/B		A	A	A	B	A
Customer 6	GENERAL SERVICE 50 TO 2,999 KW SERVICE CLASSIFIC	kWh		2,720,301	4,290,880	3,140,661	4,765,139	4,363,831
oustomero		kw	6,636	6,398	9,100	7,511	9,004	8,749
		Class A/B		A	A 0,100	A	B	A
Customer 7	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh		3,653,252	3,022,992	3,875,861	2,323,364	2,923,492
Customern	DENETINE SERVICE SO TO 2,355 (W SERVICE CERSOINE	kW	7.699	7,753	6.300	8.008	5,192	6,317
		Class A/B		A 1,135	A 0,000	A	B	A 0,511
Customer 8	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh		2,192,968	2,178,108	2,298,968	2,032,284	2,059,400
customero	GENERAL SERVICE SUTO 2,333 KW SERVICE CEASSING	kW	5,678	5.402	4,344	5.640	3.557	3.709
		Class A/B		A 3,402	A 4,044	A 3,040	B	A 3,103
Customer 9	GENERAL SERVICE 50 TO 2,999 KW SERVICE CLASSIFIC	kWh		3,289,726	3,197,072	3,361,416	3,121,433	3,285,061
Customer 9	GENERAL SERVICE SUITO 2,333 KW SERVICE CLASSIFIC	kwn kW	5,401	5,205,720	5,445	5,5610	5,333	5,563
		Class A/B		A 5,513	B	A 5,610	B	
Customer 10	GENERAL SERVICE 50 TO 2,999 KW SERVICE CLASSIFIC	Liass Arb kWh		6,712,694	5,380,559	5,520,614	5,006,530	5,585,191
Customer IU	GENERAL SERVICE SU TU 2,333 KW SERVICE CLASSIFIC	KWN KW	12.929	6,712,634	5,300,553	5,520,614	5,006,530	5,505,13
				A 14,003	B	A 12,301	B	B
C . 4	CENERAL CERTIES SO TO 2 000 KL LCERTINGS OF ACCISIO	Class A/B		752,372				752,890
Customer 11	GENERAL SERVICE 50 TO 2,999 KW SERVICE CLASSIFIC	kWh			821,063 1,559	788,716	761,354	
		er kw	1,289	1,434	1,553 B	1,459	1,537 B	1,489 B
		Class A/B		A		A		
Customer 12	GENERAL SERVICE 50 TO 2,999 KW SERVICE CLASSIFIC	kWh		621,501	1,182,245	776,655	1,125,853	1,056,558
		er kw	5,221	5,019	5,705	5,400	5,422	5,706
		Class A/B		A	В	A	В	В
Customer 13	GENERAL SERVICE 50 TO 2,999 KW SERVICE CLASSIFIC	kWh		214,789	217,243	233,474	223,006	228,443
		kW	1,039	1,161	1,154	1,119	1,305	1,220
		Class A/B		A	В	A	В	В
Customer 14	GENERAL SERVICE 50 TO 2,999 KW SERVICE CLASSIFIC	kWh		1,172,942	1,730,943	1,973,697	1,923,736	1,947,272
		kw	3,243	2,854	3,580	4,268	4,098	4,132
		Class A/B		A	В	В	В	В
Customer 15	GENERAL SERVICE 50 TO 2,999 KW SERVICE CLASSIFIC	kWh		1,427,327	1,829,038	2,142,753	1,923,078	2,309,202
		kW		2,983	3,657	3,615	3,755	3,939
		Class A/B		Å	В	В	В	В
Customer 16	GENERAL SERVICE 50 TO 2,999 KW SERVICE CLASSIFIC	kWh		1,286,211	1,116,358	1,487,343	-	-
		k₩	2,843	3,202	3,356	3,861	-	-
		Class A/B	В	A	В	В		

- a) Please review the transition period for each of the 16 customers listed and confirm that the transition period has been reversed.
- b) Please confirm that the aggregated consumption date on tab 6.1a is correctly allocated despite this reversal.

Ref: Manager's Summary, page 8, August 18, 2021

At Reference #1, Elexicon included a table summarizing its request to clear 2018, 2019, and 2020 Group 1 deferral and variance account (DVA) balances for the VRZ and no disposition request to clear any DVA balances for the WRZ. However, Elexicon has not stated whether it is requesting final or interim disposition of its Group 1 DVAs for the VRZ.

a) Please clarify whether Elexicon is seeking final or interim disposition of its Group
 1 DVAs for the VRZ in the current proceeding.

OEB Staff-18

Ref: (1) Filing Requirements For Electricity Distribution Rate Applications - 2021 Edition for 2022 Rate Applications - Chapter 3 Incentive Rate-Setting Applications, June 24, 2021, page 12 & 13
(2) Manager's Summary, page 21, August 18, 2021 OEB staff notes that Elexicon's 2018 and 2019 balances for the VRZ were not disposed in previous proceedings as the threshold test was not met and Elexicon did not request disposition.

At Reference #1, the OEB set out its expectations for final disposition requests of commodity pass-through account balances when there has been no disposition requested in prior years due to the threshold test. The OEB further stated:

If these distributors have now reviewed these balances in the context of the Accounting Guidance and are confident that there are no systemic issues with their RPP settlement and related accounting processes, such distributors may explain those circumstances and request final disposition of these account balances. If these distributors identified errors or discrepancies that materially affect the ending account balances, distributors should adjust their account balances prior to requesting final disposition.

At Reference #2, Elexicon stated that regarding the VRZ, it outlined in its 2021 VRZ rate application (EB-2020-0013) that it completed the modifications necessary to ensure compliance with the accounting guidance, highlighting some changes made in calendar 2019 and 2020. Elexicon indicated that for the VRZ it is now completely aligned with the OEB Accounting Guidance.

- a) Please confirm that Elexicon is confident that regarding the VRZ there are no systemic issues with its RPP settlement and related accounting processes regarding its 2018 and forward balances.
- b) If this is not the case, please explain.
- c) Please confirm that no errors or discrepancies were identified that materially affect the ending account balances.
- d) If this is not the case, please explain.

OEB Staff-19

Ref: (1) Manager's Summary, page 8, August 18, 2021 (2) Manager's Summary, page 26, August 18, 2021

At Reference #1, Elexicon is requesting an extension request for the WRZ. This extension request is with respect to the implementation of the OEB's Accounting Guidance related to Accounts 1588 and 1589. Elexicon stated that the extension will

support additional process changes delayed by the COVID-19 emergency and unexpected upgrades related to the recently merged CIS.

At Reference #2, Elexicon noted that additional planning is in place to support the continued transition to a consistent settlement process and tool for the WRZ which mirrors the VRZ. Elexicon further stated that while this transition will not have a material effect on the outcome of the settlement amounts, it will assist to align to the timing expectations for settlement and true-ups as outlined in the OEB's regulatory accounting guidance. Elexicon also noted that it will also provide for greater consistency between both of the rate zones' processes.

- a) Please confirm that if the OEB grants Elexicon's request regarding the implementation of the OEB's Accounting Guidance for Accounts 1588 and 1589 for the WRZ, there will be no material impact on WRZ's Group 1 DVA balances that have not yet been disposed on a final basis (i.e., 2020 balances and forward).
- b) If this is not the case, please explain.
- c) Please confirm whether Elexicon expects further adjustments to any of the DVAs for the WRZ upon the implementation of the new integrated CIS system. If so, please provide the details.

OEB Staff-20

Ref: (1) Manager's Summary, page 26, August 18, 2021 (2) Manager's Summary, page 27, August 18, 2021

At Reference #1, Elexicon stated that regarding the WRZ, the finalization of true-ups under the old process must be completed and new processes set up to support the updated processes going forward. Elexicon further noted that the transition will require additional time and Elexicon plans to complete this by the end of 2021 to allow for implementation of the new process at the beginning of 2022.

At Reference #2, Elexicon stated that the WRZ's outcomes continue to be fully aligned with the OEB's Accounting Guidance. Elexicon further stated that the remaining changes to align processes and improve the timing of true-ups will require additional time and effort and will follow the major CIS upgrades in 2021.

Elexicon requested that the OEB approve an extension to complete this transition by the end of 2021. Elexicon noted that the extension will not impact customers, nor the outcome of account balances reviewed for disposition. Elexicon noted that it is a strictly

a process driven change mandated by the OEB decision (EB-2019-0130) which results in a standard process with some accelerated timing.

- a) Please confirm that Elexicon remains on track to complete WRZ's above noted transition by the end of 2021, in order to allow for implementation of the new process at the beginning of 2022.
- b) If this is not the case, please explain.
- c) Please explain if Elexicon is granted the extension by the OEB, there will be either no impact on the Group 1 DVA balances or an immaterial impact on the Group 1 DVA balances.

OEB Staff-21

- Ref: (1) EE_VRZ_2022_Acctg Guidance 2020 Analysis_full year_20210818.xlsx
 - (2) VRZ, IRM Rate Generator Model, August 18, 2021
 - (3) Manager's Summary, page 21, Table 8, August 18, 2021

At Reference #1, the 2020 "balance per DVA Continuity Schedule" for Accounts 1588 and 1589 as shown in cells E31 and E43 of tab "Final RSVA Balances" are different than that shown in the DVA Continuity Schedule, at Reference #2. The differences are as follows in OEB Staff Table 1:

OEB Staff Table 1 – VRZ Difference between Accounting Guidance and DVA Continuity Schedule

		Account 1588			Account 1589		
			Principal			Principal	
		Transactions	Adjustments	Total	Transactions	Adjustments	Total
Accounting	g Guidance 2020 Analysis			446,489			595,383
DVA Conti	tinuity Schedule (sum of 2020						
transaction	ns and principal adjustments)	307,491	111,001	418,491	(185,842)	809,517	623,675
Difference	9			27,998			(28,292)

At Reference #3, Elexicon indicated that for the VRZ it is now completely aligned with the OEB Accounting Guidance.

- a) Does Elexicon agree with the values shown in OEB Staff Table 1? If Elexicon disagrees, please update the table accordingly.
- b) Although the differences in OEB Staff Table 1 may be immaterial, please explain why there are any differences at all, given that Elexicon noted that it is completely aligned with the OEB Accounting Guidance for the VRZ.

- c) Please explain why there are some principal adjustment true-ups for the VRZ, considering that Elexicon noted that it is completely aligned with the OEB Accounting Guidance for the VRZ.
- d) Please confirm that the row "Accounting Guidance 2020 Analysis" in OEB Staff Table 1, is not intended to reflect the balances in the DVA Continuity Schedule which reflect the general ledger. Instead, it is intended to represent the balances as calculated using the OEB model from the February 21, 2019 accounting guidance. If this is not the case, please explain why there are differences between the two rows in OEB Staff Table 1.

- Ref: (1) EE_WRZ_2020_Acctg Guidance_2020 Analysis_20210818.xlsx
 - (2) WRZ, IRM Rate Generator Model, August 18, 2021
 - (3) Manager's Summary, page 21, Table 8, August 18, 2021

At Reference #1, the 2020 "balance per DVA Continuity Schedule" for Accounts 1588 and 1589 as shown in cells E30 and E42 of tab "Final RSVA Balances" are different than that shown in the DVA Continuity Schedule, at Reference #2. The differences are as follows in OEB Staff Table 2:

OEB Staff Table 2 – WRZ Difference between Accounting Guidance and DVA Continuity Schedule

	Account 1588			Account 1589		
		Principal			Principal	
	Transactions	Adjustments	Total	Transactions	Adjustments	Total
Accounting Guidance 2020 Analysis			(268,794)			20,715
DVA Continuity Schedule (sum of 2020						
transactions and principal adjustments)	(103,312)	(137,108)	(240,420)	(306,810)	327,104	20,294
Difference			(28,374)			421

At Reference #3, Elexicon indicated that it is now completely aligned with the OEB Accounting Guidance for the WRZ, except for the timing of true-ups, which are addressed through principal adjustments in the DVA Continuity Schedule.

- a) Does Elexicon agree with the values shown in OEB Staff Table 2? If Elexicon disagrees, please update the table accordingly.
- b) Although the differences in OEB Staff Table 2 may be immaterial, please explain whether these differences are due to the timing of true-ups for the WRZ, which are addressed through principal adjustments in the DVA Continuity Schedule. If this is not the case, please explain.

c) Please confirm that the row "Accounting Guidance 2020 Analysis" in OEB Staff Table 2, is not intended to reflect the balances in the DVA Continuity Schedule which reflect the general ledger. Instead, it is intended to represent the balances as calculated using the OEB model from the February 21, 2019 accounting guidance. If this is not the case, please explain.

OEB Staff-23

Ref: (1) WRZ, GA Analysis Workform, August 18, 2021

(2) VRZ, GA Analysis Workform, August 18, 2021

(3) Veridian Connections Inc. RRR 2.1.7 filing, December 31, 2018 data

(4) Elexicon RRR 2.1.7 filing, December 31, 2019 and December 31, 2020 data

OEB staff has prepared the following OEB Staff Table 3 with data from Reference #1, #2, #3, and #4.

		VRZ, GA Analysis Workform, Account 1588 Reasonability Test, August 18, 2021 A	Veridian Connections Inc	RRR 2.1.7 Variance over the		
Account 4705 - 2018	December 31,	141,704,997	141,704,997	-		
		WRZ, GA Analysis Workform, Account 1588 Reasonability Test, August 18, 2021	Workform, Account 1588 Reasonability	Elexicon Energy	Elexicon Energy Actual RRR 2.1.7 Filing G	Elexicon Energy RRR 2.1.7 Variance over the Actual RRR 2.1.7 Filing H = F - G
Account 4705 - 2019	December 31,	TBD	144,416,286	TBD	139,698,760	TBD
Account 4705 - 2020	December 31,	69,829,555	191,818,073	261,647,628	261,647,628	0

OEB Staff Table 3 – Reconciliation of RRR 2.1.7 Data – Account 4705

- a) Does Elexicon agree with the values shown in OEB Staff Table 3? If Elexicon disagrees, please update the table accordingly.
- b) Please populate the cells that are marked "TBD" and explain differences, if any, in Column H.
- c) Please explain any other differences that may arise if Elexicon updates OEB Staff Table 3.

d) Please confirm that Elexicon filed a harmonized RRR 2.1.7 for December 31, 2019 and December 31, 2020 data, but filed separated RRR 2.1.7 for December 31, 2018 data for Veridian Connections Inc. and Whitby Hydro Electric Corporation. If this is not the case, please explain.

OEB Staff-24

Ref: (1) VRZ, IRM Rate Generator Model, August 18, 2021 (2) VRZ, GA Analysis Workform, August 18, 2021

At Reference #1, Elexicon has included an Account 1588 2020 principal adjustment of \$111,001 in cell BF28. This matches the Account 1588 2020 principal adjustment of \$111,001 at Reference #2, Tab Principal Adjustments. However, this does not match the credit of (\$19,194) 2020 principal adjustment at Reference #2, Tab Account 1588 Reasonability.

a) Please clarify which is the correct Account 1588 2020 principal adjustment –a debit of \$111,001 or a credit of (\$19,194). Please provide any necessary updates to reconcile the two amounts.

OEB Staff-25 Ref: WRZ Rate Generator, Tab 20 and VRZ Rate Generator, Tab 20 - Bill Impact

OEB staff has identified that the Non-RPP Retailer Average Price and Average IESO Wholesale Market Price used at the above reference were incorrectly entered as \$0.2689. OEB staff has updated the pricing to reflect the correct amount of \$0.1060.

a) Please confirm that the models included with these interrogatories reflect this update.