



December 7, 2021

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

Dear Ms. Long,

**Re: ENWIN Utilities Ltd.
2022 IRM Rate Application – Draft Decision and Rate Order Comments
EB-2021-0019**

On December 3, 2021, the Ontario Energy Board (“OEB”) issued a draft of the Decision and Rate Order for ENWIN Utilities Ltd.’s (“ENWIN”) 2022 IRM Rate Application, along with a GA Analysis Workform and an updated 2022 IRM Rate Generator Model.

The OEB requested that ENWIN review the draft Decision and accompanying Rate Order and provide comments within four days.

ENWIN’s comments are provided below.

GA Analysis Workform

ENWIN has reviewed and confirms that the GA Analysis Workform issued matches the version ENWIN filed on August 18, 2021.

Updated 2022 IRM Rate Generator Model

Reference	Comment
Tab 19. - Final Tariff Schedule	<p>Unmetered Scattered Load / Sentinel Lighting / Street Lighting Service Classifications</p> <ul style="list-style-type: none">Line Item “Rate Rider for Disposition of Deferral/Variance Accounts (2022) – effective until December 31, 2022” <p>ENWIN requests the following changes be made for consistency with the presentation of other fixed charges for these rate classes:</p> <ul style="list-style-type: none">Include “(per connection)” in the Line Item descriptionRound rate rider to two decimal placesMove Line Item up with the other fixed charges (all fixed charges listed first ahead of variable charges)

Tab 20. - Bill Impacts	<ul style="list-style-type: none"> • Average IESO Wholesale Market Price / Non-RPP Retailer Average Price should be updated to \$0.1060 / kWh, where applicable. Please see response to OEB Staff Question 5, filed October 4, 2021, for further information. • Large Use – Regular / Large Use - 3TS Service Classifications <ul style="list-style-type: none"> ◦ Loss Factor should be 1.0045, rather than 1.0311 • Residential Service Classification – Non-RPP (Retailer) <ul style="list-style-type: none"> ◦ Ontario Electricity Rebate calculated in Row 572 should be included in the Total Bill amount in Row 573 • General Service Less than 50 kW Service Classification – Non-RPP (Retailer) <ul style="list-style-type: none"> ◦ Ontario Electricity Rebate calculated in Row 628 should be included in the Total Bill amount in Row 629
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ENWIN has corrected the above issues noted on Tab 20. – Bill Impacts in the attached 2022 IRM Rate Generator Model (ENWIN_2022-IRM-Rate-Generator-Model_DRAFT_20211203_ENWIN Updates 20211207).

As ENWIN does not have access to make the changes noted on Tab 19. – Final Tariff Schedule, ENWIN respectfully requests that OEB Staff make these changes and include them in the Final Tariff of Rates and Charges.

Draft Decision and Rate Order

Reference	Comment
Throughout	<ul style="list-style-type: none"> • “EnWin Utilities” should be “ENWIN Utilities”
p.1 – Second paragraph	<ul style="list-style-type: none"> • “...a monthly total bill increase of \$2.62...” should be “...a monthly total bill increase of \$2.73...”
p.7 – Second paragraph	<ul style="list-style-type: none"> • “...a total credit claim of \$0.0004 per kWh...” should be “...a total credit claim of \$0.0006 per kWh...”
p.8 – First paragraph	<ul style="list-style-type: none"> • “CBR Class B” should be removed from the following sentence, as the balance of the CBR Class B variance account is being disposed along with Account 1580 – Wholesale Market Service Charge through the general Deferral and Variance Account rate rider <ul style="list-style-type: none"> ◦ “EnWin Utilities has proposed to allocate a portion of the Global Adjustment and CBR Class B balances to its transition customers, based on their customer-specific consumption levels.”
p.10 – Footnote 14	<ul style="list-style-type: none"> • “EB-2019-0032, Decision and Order, Page 1, November 14, 2019” should be “EB-2019-0032, Decision and Order, Page 3, October 17, 2019”

Schedule A - Tariff of Rates and Charges

Reference	Comment
General	<ul style="list-style-type: none">• Updates to Tab 19 of the 2022 IRM Rate Generator Model noted above will need to be reflected in the Tariff of Rates and Charges attached as Schedule A

Should you have any questions, please do not hesitate to contact the undersigned.

Yours very truly,

ENWIN Utilities Ltd.



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c.c. Alexander Di Ilio, OEB Staff