

December 8, 2021

BY RESS and EMAIL

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

Dear Ms. Long;

**RE: APPLICATION BY ALECTRA UTILITIES CORPORATION FOR DISTRIBUTION RATES
EFFECTIVE JANUARY 1, 2022 (EB-2021-0005)**

On August 18, 2021, Alectra Utilities filed an application with the Ontario Energy Board (“OEB” or the “Board”) under Section 78 of the *Ontario Energy Board Act, 1998* as amended and pursuant to the OEB’s *Filing Requirements for Incentive Rate-setting Applications* seeking approval for electricity distribution rates, and other charges, effective January 1, 2022. The Board assigned File Number EB-2021-0005 to the Application.

The Board issued a Draft Decision and Rate Order (“the Draft Decision”) on this matter on December 2, 2021. The Board directed Alectra Utilities to advise the OEB, in writing, of any concerns (e.g., typographical or transposition errors, omissions, need for clarification, etc.) with respect to the Draft Decision, by December 9, 2021. Alectra Utilities herein provides comments related to certain items contained in the Decision, below:

1. Tariff of Rates and Charges - Rate Accuracy

Alectra Utilities has reviewed the Tariff of Rates and Charges set out in Schedule A and confirms that the rates are complete and accurate.

2. Tariff of Rates and Charges – Rate Descriptions and Formatting

Alectra Utilities has reviewed the Tariff of Rates and Charges in Schedule A and observes the following issues regarding the rate descriptions and presentation or formatting of the rates. Alectra Utilities recommends the following updates to the Tariff of Rates and Charges, in order to ensure consistency in the presentation of the rates across its five rate zones (“RZs”), and with the 2021 OEB-approved Tariff of Rates and Charges schedules:

- Brampton and PowerStream RZs:
 - Alectra Utilities observes there are inconsistencies in the chronological order of the Rate Riders for Recovery of Incremental Capital for the Brampton and

PowerStream RZs. Alectra Utilities recommends that the OEB present Rate Riders for Recovery of Incremental Capital from newest vintage to oldest vintage in all cases where multiple vintages of Rate Riders for Recovery of Incremental Capital are presented together. This impacts the presentation of the volumetric Incremental Capital Rate Riders in these RZs.

- Brampton RZ
 - The Smart Metering Entry Charge should appear after the Rate Riders for Recovery of Incremental Capital for the Residential and General Service Less than 50 kW Service Classifications, pages 1 and 2 of 17.

3. Decision Narrative Corrections

Alectra Utilities notes that at page 1 of the Decision the OEB states "*For the Enersource RZ, there will be a monthly total bill increase of \$2.08.*" Alectra Utilities submits that the record should be updated to reflect a monthly total bill increase of \$2.03, consistent with bill impact schedules in the Rate Generator Model for the Enersource RZ.

Alectra Utilities also observes that at page 4 of the Decision the OEB states "*Inserting these components into the formula results in a 1.90% increase to Alectra Utilities' rates...*" Alectra Utilities submits that the record should be updated to reflect a 3.00% increase to Alectra Utilities' rates.

Finally, Alectra Utilities also notes that at page 26 of the Decision, as part of its Findings on the Capitalization Deferral Account, the OEB states: "*This issue of allocation will persist in Alectra Utilities' IRM proceedings until it rebases in 2028. In 2028, it is expected that Alectra Utilities will apply to the OEB to dispose of the accumulated balances in the capitalization deferral accounts and parties will have the opportunity to review and test the accumulated balances at that time.*"

Alectra Utilities submits that the record should be updated to reflect that it is expected to rebase in 2027, following the end of its rebasing deferral period.

Should you have any questions or require additional information, please do not hesitate to contact me.

Yours truly,



Michael Lister

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cc: Charles Keizer, Torys LLP