

**ERTH Power Corporation
EB-2021-0021**

Please note, ERTH Power Corporation (ERTH Power) is responsible for ensuring that all documents it files with the OEB, including responses to OEB staff questions 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*.

Please also note, OEB staff has updated the IRM Rate Generator Model attached to these questions for both rate zones in the following areas:

- Tab 11 Uniform Transmission Rates:¹
 - Network Service Rate \$/kW 5.13
 - Line Connection Service Rate \$/kW 0.88
 - Transformation Connection Service Rate \$/kW 2.81
- Tab 11 Hydro One Sub-Transmission Rates:²
 - Network Service Rate \$/kW 4.3473
 - Line Connection Service Rate \$/kW 0.6788
 - Transformation Connection Service Rate \$/kW 2.3267
- Tab 16 cell B12 the Price Escalator has been updated with a value of 3.30%³
- Tab 17 Inflation Factors for Retail Service Charges have been updated to 3.30%⁴
- Tab 17 cell F39 Specific charge for access to the power poles - per pole/year (with the exception of wireless attachments) has been updated to \$34.76 and reference to approval on an interim basis has been removed on Tab 19

¹ EB-2021-0276, Decision and Rate Order, December 16, 2021

² EB-2021-0032, Decision and Rate Order, December 14, 2021

³ EB-2021-0212, Decision and Order, November 18, 2021

⁴ EB-2021-0301, Decision and Order, November 25, 2021

OEB Staff-1: Main Rate Zone

Reference: (1) IRM Rate Generator Model, Tab 3: Continuity Schedule

OEB staff reproduced parts of ERTH Power's Account 1595 entries at Reference 1 for the Main Rate Zone:

Account 1595 (2018)		Account 1595 (2020)	
OEB-Approved Disposition during 2019 (Principal)	OEB-Approved Disposition during 2019 (Interest)	OEB-Approved Disposition during 2020 (Principal)	OEB-Approved Disposition during 2020 (Interest)
(1,046,735)	(65,132)	(177,081)	(88,916)

Question(s):

- a) OEB staff was unable to reconcile the amounts in the table above with the balances approved for disposition during ERTH Power's 2018 and 2020 IRM proceedings. Please provide the details used to arrive at these input amounts.

OEB Staff-2: Goderich Rate Zone

Reference: (1) IRM Rate Generator Model, Tab 3: Continuity Schedule

OEB staff has reproduced parts of ERTH Power's Account 1595 entries at Reference 1 for the Goderich Rate Zone:

Account 1595 (2020)	
OEB-Approved Disposition during 2020 (Principal)	OEB-Approved Disposition during 2020 (Interest)
(326,570)	(32,621)

Question(s):

- a) OEB staff was unable to reconcile the amounts in the table above with the balances approved for disposition during ERTH Power's 2020 IRM proceeding. Please provide the details used to arrive at these input amounts.

OEB Staff-3: Goderich Rate Zone

Reference: (1) IRM Rate Generator Model, Tab 3: Continuity Schedule

As per Reference 1, the total claim amount in Account 1595 (2017) is a debit balance of \$5,990. OEB staff notes that in ERT Power's 2017 IRM proceeding, the OEB approved a tax sharing amount of \$509 to be recorded in Account 1595 (2017) for disposition at a later date⁵. ERT Power also did not dispose of any Group 1 balances in that proceeding.

Question(s):

- a) OEB staff was unable to reconcile the \$5,990 total claim amount in Account 1595 (2017). Please provide the details used to arrive at this balance.

OEB Staff-4: Both Rate Zones

Reference: (1) Summary, pages 13, 29

It states that ERT Power has determined that there is a billing inconsistency with respect to one of its wholesale metering points billed on its IESO invoice and is currently reviewing the findings with IESO staff. As such ERT Power is not requesting disposition of these balance on an interim or final basis at this time for its Main Rate Zone or Goderich Rate Zone.

Question(s):

- a) Please provide any updates to the investigation with the IESO.
- b) Please explain whether the billing inconsistency pertains to both rate zones.
 - i. If it does not, please explain why disposition of Group 1 balances has not been requested for the unaffected rate zone.

OEB Staff-5: Both Rate Zones

Reference: (1) Summary, pages 13, 29

In the decision and orders for ERT Power's 2020 and 2021 rate applications,⁶ the OEB directed ERT Power to file and address specific items in its application for 2022 rates. ERT Power is currently investigating a billing inconsistency with the IESO and is not requesting disposition of Account 1588 and Account 1589.

Question(s):

⁵ EB-2016-0112, Decision and Rate Order, dated March 30, 2017

⁶ EB-2019-0033 and EB-2020-0019, respectively

- a) Please explain whether EARTH Power has addressed all the other items required per the 2020 and 2021 decision and rate orders, aside from the billing inconsistency that is currently being investigated.
- b) Please confirm whether EARTH Power will be in a position to request disposition of Group 1 balances for both rate zones by its 2023 rate application.

OEB Staff-6: Both Rate Zones

Reference: (1) IRM Rate Generator Model, Tab 2: Current Tariff Schedule
(2) IRM Rate Generator Model, Tab 4: Billing Det. for Def-Var

Question(s):

- a) Please confirm the accuracy of the data at Reference 1 and 2 above for both rate zones. Otherwise, please outline any required changes for OEB staff to make.