



January 31, 2022

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

Via RESS

Dear Ms. Marconi,

**RE: Phase 2 of IRM Rate Application, EB-2021-0019
ENWIN Utilities Ltd.'s Reply Submissions**

Pursuant to the Ontario Energy Board's Notice of Hearing and Procedural Order No. 1 dated December 17, 2021, please find enclosed ENWIN Utilities Ltd.'s reply submissions in the above-referenced proceeding, which have been filed in the Regulatory Electronic Submission System and delivered to the intervenors and individuals listed below by email.

Thank you for considering ENWIN Utilities Ltd.'s reply submissions, and please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

ENWIN Utilities Ltd.

A handwritten signature in black ink, appearing to read "Claire Bebbington", written in a cursive style.

Claire Bebbington
Director, Regulatory Affairs

Cc: EB-2021-0019 Intervenors
Alexander Di Ilio (OEB Case Manager)
Michael Millar (OEB Counsel)

EB-2021-0019

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998* S.O. 1998, c. 15.

AND IN THE MATTER OF Phase 2 of an application made by ENWIN Utilities Ltd. under Section 78 of the *Ontario Energy Board Act, 1998* S.O. 1998, c. 15, for an order approving just and reasonable rates and other charges for electricity distribution beginning January 1, 2022.

**ENWIN UTILITIES LTD.
REPLY SUBMISSIONS**

January 31, 2022

A. INTRODUCTION

1. On August 18, 2021, ENWIN Utilities Ltd. (“**ENWIN**”) filed an application with the Ontario Energy Board (“**OEB**”) seeking an order approving changes to its rates and other charges for electricity distribution beginning January 1, 2022 (the “**Application**”), which were approved on a final basis on December 9, 2021, and seeking an order amending the description of the Large Use – 3TS Service Classification (“**3TS Service Classification**”).¹
2. The OEB convened a second phase of the proceeding before a panel of Commissioners to consider the proposed amendment to the description of the 3TS Service Classification, with a Technical Conference on January 13, 2022 and the opportunity to file submissions.² This represents ENWIN's reply to the submissions it received from OEB Staff, the Association of Major Power Consumers of Ontario (“**AMPCO**”), the Vulnerable Energy Consumers Coalition (“**VECC**”), and the School Energy Coalition (“**SEC**”).³

B. REPLY TO THE SUBMISSIONS

3. OEB Staff, AMPCO, and VECC support ENWIN's request to amend the description of the 3TS Service Classification, and SEC does not object.⁴ Therefore, and for the reasons set out in the Application, Technical Conference transcript dated January 13, 2022, and Parties' submissions, ENWIN states that its request to amend the description of the 3TS Service Classification should be approved.
4. OEB Staff indicated that the OEB should consider directing ENWIN to re-evaluate and, if necessary, update the cost allocation and rate design for the 3TS Service Classification at

¹ EB-2021-0019 – ENWIN's 2022 IRM Rate Application dated August 18, 2021.

² EB-2021-0019 – OEB's Decision and Rate Order dated December 9, 2021; and EB-2021-0019 – OEB's Notice of Hearing and Procedural Order No. 1 dated December 17, 2021.

³ Consumers' Council of Canada (“**CCC**”) was also granted intervenor status, but ENWIN did not receive any submissions from CCC, and it assumes that CCC takes no position on this matter.

⁴ OEB Staff Submissions dated January 27, 2022, page 3; AMPCO Submissions dated January 26, 2022, page 4; VECC Submissions dated January 27, 2022, page 4; and SEC Submissions dated January 27, 2022, page 1.

the time of its next cost of service application.⁵ ENWIN states that an OEB direction is not required, as ENWIN is willing to undertake to review the cost allocation and rate design for the 3TS Service Classification and include the results of the review, including any proposed updates, in its next cost of service application without an OEB direction to that effect.

5. OEB Staff also suggested that ENWIN should prepare more detailed documentation for customer communications relating to the level of service provided to customers in the 3TS Service Classification as compared to other customer classes.⁶ ENWIN states that, as part of its review of the Conditions of Service starting in 2022, it will further clarify the level of service provided to all of its service classifications, where required (which in this instance includes the level of service associated with the 3TS Service Classification), and it will notify customers of any proposed changes to the Conditions of Service as set out in the Distribution System Code.
6. Finally, VECC and SEC have stated that the description of the 3TS Service Classification in the Tariff of Rates and Charges (the “**Tariff**”) and/or the Conditions of Service should be amended to clarify what constitutes a “dedicated transformer station”, including that they are owned by ENWIN and connected to the transmission system.⁷ ENWIN states that it is not necessary to amend the description of the 3TS Service Classification in the Tariff. Rather, ENWIN will update its Conditions of Service to clarify what constitutes a “dedicated transformer station” and, as part of the review process, notify customers of any proposed changes. In addition, ENWIN notes that the Tariff currently provides that further servicing details regarding the 3TS Service Classification are available in its Conditions of Service, which ENWIN believes is the most appropriate location for this information.

⁵ OEB Staff Submissions dated January 27, 2022, pages 3 and 4-5.

⁶ OEB Staff Submissions dated January 27, 2022, pages 3 and 5-6.

⁷ VECC Submissions dated January 27, 2022, pages 4-5 and 11-12; and SEC Submissions dated January 27, 2022, pages 1-2.

C. CONCLUSION

7. Therefore, ENWIN states that its request to amend the 3TS Service Classification description should be approved.

All of which is respectfully submitted this 31st day of January, 2022.

ENWIN Utilities Ltd.

A handwritten signature in black ink, appearing to read "Claire Bebbington". The signature is fluid and cursive, with the first name "Claire" being more prominent than the last name "Bebbington".

M. Claire Bebbington
Director, Regulatory Affairs