

March 7, 2022

VIA EMAIL & RESS

Ms. Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street, 26th Floor
PO Box 2319
Toronto, ON M4P 1E4

**Re: Board File No. EB-2021-0026 – 2022 Incentive Regulation Mechanism Application
Greater Sudbury Hydro Inc. – Licence No. ED-2002-0559**

Dear Ms. Long,

GSHI confirms it has reviewed the decision and accompanying draft Rate Order for accuracy and completeness. GSHI has noted the following and is requesting Board Staff review to determine if changes are necessary.

1) Page 8 Group 1 Deferral and Variance Accounts – final paragraph

The paragraph currently reads: *“Greater Sudbury Hydro had no Class A customers during the period in which variances accumulated so it has applied to have the balance of the CBR Class B account disposed along with Account 1580 - Wholesale Market Service Charge through the general Deferral and Variance Account rate rider.”* GSHI did have class A customers while the balance was being accumulated, however GSHI did not have any customers transition between Class A and Class B while the balance was accumulated, which would affect the application of the recovery. GSHI proposes the following wording for consideration: *“Greater Sudbury Hydro did not have any customers transition between Class A and Class B during the period in which variances accumulated so it has applied to have the balance of the CBR Class B account disposed along with Account 1580 - Wholesale Market Service Charge through the general Deferral and Variance Account rate rider.”* Should Board Staff have other standard wording for this situation, GSHI is amenable to inserting standard wording instead of its proposed wording.

2) Page 9 Findings – second paragraph

The paragraph currently reads: *“The OEB approves the disposition of a debit balance of \$1,179,616 as of December 31, 2020, including interest projected to April 30, 2022, for Group 1 accounts on **an** final basis.”* GSHI believes there is a typographical error, and the end of the

sentence should read “...on a final basis.”

3) Page 11 Lost Revenue Adjustment Mechanism Variance Account – fourth paragraph

The paragraph currently reads: “Actual conservation savings were compared against Greater Sudbury Hydro’s forecasted conservation savings of 13,566,120 kWh included in its last OEB-approved load forecast.” GSHI believes that as the LRAMVA balance relates to variances accumulated in 2020, the conservation savings figure of 13,566,120 kWh is incorrect as that figure is from GSHI’s 2013 Cost of Service Application. The correct figure from GSHI’s 2020 Cost of Service Application is 6,306,236 kWh.

4) Page 11 Findings paragraph

GSHI notes there is a typographical error as it refers to the LRAMVA credit balance of \$48,007 and GSHI believes it should be \$48,008.

5) Page 12 Table 8.1 LRAMVA Balance for Disposition

GSHI questions whether the Total Claim of \$48,008 should be in brackets as it is a net credit being refunded to customers.

6) Tariff Sheets for Unmetered Scattered Load, Sentinel Lighting and Street Lighting

In the Proposed Rates and Tariff Schedule section of GSHI’s Manager Summary (page 15 of the Managers Summary), GSHI had requested that the words “per connection” be added to the Rate Rider for Recovery of Advanced Capital Module for the Unmetered Scattered Load, Sentinel Lighting and Street Lighting service classes. The rate rider was calculated on a per connection basis and GSHI requests that they clarification be made to its tariff sheets to avoid any confusion. GSHI notes that the words “per connection” are missing from the draft Tariff Sheets.

A copy of this letter has been provided to GSHI’s case manager.

Yours Truly,

Original signed by

Tijja Luttrell, CPA, CA
Supervisor – Regulatory

Cc: Alexander Di Ilio