August 29, 2022   **VIA E-MAIL**

Ms. Nancy Marconi
Registrar (registrar@oeb.ca)
Ontario Energy Board
Toronto, ON

Dear Ms. Marconi:

> **Re:** **EB-2022-0044 – Kingston Hydro Corporation**
> **Application for 2023 Electricity Distribution Rates**
> **Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)**

Please find attached the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

Mark Garner
Consultants for VECC/PIAC

Email copy:
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For interrogatory clarifications please contact Mark Garner at 647-408-4501 or markgarner@rogers.com

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1.0   ADMINISTRATION (EXHIBIT 1)

1.0-VECC-1
Reference: Exhibit 1, Tab 6, Schedule 1

a) Please provide the KHC Scorecard which includes the 2021 results.

1.0-VECC-2
Reference: Exhibit 1, Tab 8, Schedule 1, Attachment 1, PDF page 245.

"During the year, the Corporation contracted for certain financial services from the City of Kingston. As at December 31, 2021, the Corporation had an amount due from the City of Kingston representing the cumulative net balance of cash receipts and disbursements processed by the City of Kingston on behalf of the Corporation, in the amount of $8,776,828 (2020 - $6,628,073) The City of Kingston pays the Corporation interest on the balance at a rate of prime minus 1.65%."

a) Please explain why Kingston Hydro calculates interest at a discount to prime rather than an increment to prime as is generally the case for a lender.

1.0-VECC-3
Reference: Exhibit 1, Tab 9, Schedule 1

a) Please provide the annual membership fees for USF and GridSmartCity for each year 2016 through 2023 (forecast)
b) If KHC is a member of the EDA please provide the annual membership fees for each year 2016 through 2023 (forecast).

1.0-VECC-4
Reference: Exhibit 1, Tab 9, Schedule 1

a) Using 2021 as the last complete year please provide the number of customers who annual receive e-billing
b) For a new customer is the default billing paper or e-billng?
c) Does KCH have any programs which aim to convert paper billed customers to e-billing. If yes please describe these programs.

1.0-VECC-5
Reference: Exhibit 1, Tab 9, Schedule 1

a) Does KHC accept credit cards as payment. If yes does KHC (or its agent) add any incremental charge for the use of credit card as a method of payment?

2.0   RATE BASE (EXHIBIT 2)

2.0-VECC -6
Reference: Exhibit 2, Tab 4, DSP /Appendix 2-AA

a) For 2022 and 2023 KHC shows $300,000 in each year for "New Development" investments.   Please identify the projects for these amounts and specifically whether they are related to those discussed at 5.2.1 of the DSP (page 25 of 505).
b) Which month are the projects for 2022 and 2023 expected come into service?
c) Please describe the current status/progression of the projects so as to clarify the basis of the estimated in-service dates.

2.0-VECC -7
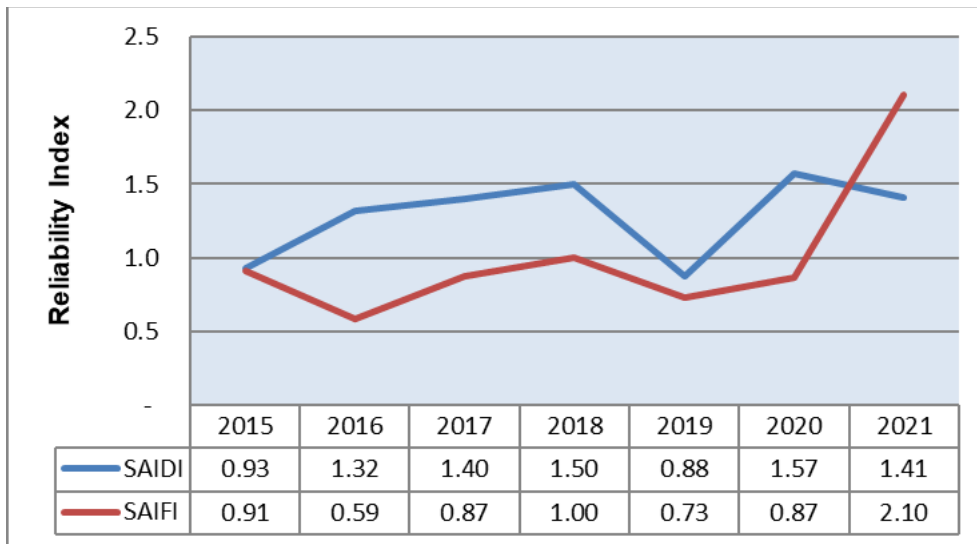Reference: Exhibit 2, Tab 4 DSP, page 65-

	2015	2016	2017	2018	2019	2020	2021
SAIDI	0.93	1.32	1.40	1.50	0.88	1.57	1.41
SAIFI	0.91	0.59	0.87	1.00	0.73	0.87	2.10

Figure 5.2-18 – 2015 to 2021 System Reliability Indices 2 **Excluding Loss of Supply and Major Event Days**

"• 44kV Customer-owned Equipment Failure in 2021
A 44kV cable termination was failed at a customer owned substation on March 5, 2021. The foreign interference caused a total of 10,716 customers of interruptions and 13,873 customer-hours of interruptions, or 0.38 in SAIFI and
0.50 in SAIDI. This single event contributed 35.5% of the annual SAIDI and 18.1% of the annual SAIFI in 2021."

a) The above chart shows a major degradation in reliability in 2021. Is the explanation provided at page 70 of 505 of the DSP the reason for this major shift?
b) What changes were made subsequent to this failure to reduce the risk of customer owned equipment causing outages to other customers?

2.0-VECC -8
Reference: Exhibit 2, Tab 4, DSP, pages 77-

a) The Service Reliability Charts at pages 72 and 73 appear to show a significant uptick in outages due to loss of supply in 2021 (1.80 with supply loss and 1.41 without). Please explain the reasons for this outage(s).

b) KHC notes that Hydro One has made some investments, specifically at the Frontenac TS, that will likely reduce loss of supply. The Utility also notes however, that there are other investments Hydro One could make to improve Kingston's reliability, specifically with respect to relays at the Gardiner DESN1. Has KHC made a request to Hydro One to make this investment and if so what was the response.

2.0-VECC -9
Reference: Exhibit 2, Tab 4, DSP, section 5.4.1.1.1

a) Please confirm that KHC forecast no capital contributions in its prior DSP estimates. If this is confirmed please explain the reason for this.
b) In this application does the category of "System Access" attract 100% of the capital contributions? If not please breakdown the capital contributions estimates by investment category for the 2023-2027 period.
c) Please explain how the capital contribution amounts were estimated for 2023 – 2027, that is show the derivation. Specifically address why it appears that contributions are a varying proportion of system access investments over the rate plan period.

2.0-VECC -10
Reference: Exhibit 2, Tab 4, DSP, section 5.4.1.1.2 pages 204-

a) KHC system access forecast for the 2023 to 2027 period is significantly higher (almost double) the past period. Please show how the 2024 to 2027 forecast of system access was derived.
b) Please explain the difference between the amount shown for system access in table 5.4. of $1,083m and that shown in Appendix 2-AA (Capital Projects) of $1,032,500.

2.0-VECC -11
Reference: Exhibit 2, Tab 4, Appendix 2-AA

a) Please update Appendix 2-AA (Capital Projects) to show the spending for the first 6 months of 2021 and the current projected in-service capital investments at year end 2021.
b) KHC system access forecast for the 2023 to 2027 period is significantly higher (almost double) than the past rate period. Please show how the 2024 to 2027 forecast of system access was derived.
c) Please explain the difference between the amount shown for system access in table 5.4. of $1,083m and that shown in Appendix 2-AA (Capital Projects) of $1,032,500.

3.0   OPERATING REVENUE (EXHIBIT 3)

3.0-VECC -12

Reference: Exhibit 3, page 31
Load Forecast Model, Historic CDM & CDM Adjustment Tabs
LRAMVA Workform, Tab 4 & 5

Preamble: It is noted that the LRAMVA Workform only includes CDM savings up to 2020 and the historical data used to estimate the Residential, GS<50 and GS>50 models does not include any adjustments to the 2021 data for the impact of CDM programs implemented in 2021.

It is noted that at page 31 the Application includes estimates as to the impact in 2021 of CDM programs implemented in 2021.

a) Please confirm that the 2012-2020 historic CDM data used in the Load Forecast Model (Historic CDM Tab) are based on the savings set out in the LRAMVA Workform (Tabs 4 & 5). If not, what is the basis for the CDM data in the Load Forecast Model?

b) What is the source for the savings from 2012-2014 CDM programs as set out in the LRAMVA Workform (Tab 4) and the Load Forecast Model (Historic CDM Tab)? Please provide copies of any reference documents that have not already been filed.

c) It is noted that in the LRAMVA Workform (Tab 4) the CDM 2012 persisting CDM savings are only reported out to 2021. What is the basis for the 2022 and 2023 persisting saving from 2012 CDM programs as set out in the Load Forecast Model (Historic CDM Tab)?

d) It is noted that in the LRAMVA Workform (Tab 4) the CDM 2013 persisting CDM savings are only reported out to 2022. What is the basis for the 2023 persisting saving from 2013 CDM programs as set out in the Load Forecast Model (Historic CDM Tab)?

e) Please re-do the regression models for the Residential, GS<50 and GS>50 classes using 2021 monthly consumption values adjusted for the 2021 CDM program savings set out on page 31. For each of the three classes please provide: i) the resulting models and their related statistics, ii) the forecast consumption for 2022 and 2023 (assuming no CDM) and iii) the forecast consumption for 2022 and 2023 (after removing persisting CDM). Note: The Load Forecast Model will need to be revised so as to include 2021 program savings in the CDM Tab and exclude them from the CDM Adjustment Tab.

3.0-VECC -13

Reference: Exhibit 3, Elenchus Report, page 2

Preamble: The Report states:

"*A range of COVID variables were considered to account for the impacts of the ongoing COVID-19 pandemic. The extent to which consumption since March 2020 differed from typical consumption was found to be related to the weather variables in those months. A set of COVID/weather interaction variables were considered to capture the incremental consumption caused by people working from home and generally staying at home due to lockdowns. These variables, "HDD COVID" and "CDD COVID" are equal to the relevant HDD and CDD variables since March 2020, and 0 in all earlier months. The coefficients reflect incremental heating and cooling load consumed as people stayed home during the pandemic. These variables continue to December 2021 but are reduced to 75% of HDD and CDD in all months in 2022 and 50% in 2023.*"

a) Please confirm that the referenced paragraph deals with the Residential class.

b) Did Elenchus test alternative COVID flag variables for the Residential class? If yes, what variables were tested and did the results using the "HDD COVID" and "CDD COVID" variables provide the best statistical results?

c) What is the impact on the Residential forecast for 2023 of using a 100% reduction (i.e., the COVID flags are zero) as opposed to a 50% reduction?

3.0-VECC -14

Reference: Exhibit 3, Elenchus Report, page 2

Preamble: The Application states:
"COVID flag variables were tested and found to be statistically significant for the General Service < 50 kW and General Service > 50 kW, and Large Use classes. A "COVID" variable equal to 0 in all months prior to March 2020 and 1 in all months since March 2020 and a "COVID_AM" variable equal to 0 in all months prior to March 2020, equal to 1 in April and May 2020, and 0.5 in each month from June 2020 to December 2021 were tested. The "COVID_AM" variable considers the incremental impact in the first few months of the pandemic, with lower impacts after May 2020. The "COVID_AM" variable is used for each of the General Service < 50 kW and General Service > 50 kW, and Large Use classes."

a) For each of the three customer classes, did the COVID_AM variable result in a better model (i.e., better statistical results) than the COVID variable?

b) For each of the three customer classes, what is the impact on the 2023 load forecast of setting the COVID_AM variable at zero and opposed to 0.25?

3.0-VECC -15

Reference: Exhibit 3, Elenchus Report, pages 5 and 19

Preamble: At page 5 the Report states:
"The number of Residential customers was found to be statistically significant and is used as an independent variable."

At page 19 the Report states:
"While Residential customer counts are not a component of the regression model, they are forecasted for the purpose of rate setting."

a) Please reconcile the two statements referenced in the Preamble.

3.0-VECC -16

Reference: Exhibit 3, Elenchus Report, pages 19, 21, 22, 24, 26, 27

b) Please provide the actual customer/connection counts for each customer class for the most recent month available.

3.0-VECC -17

Reference: Ex. 3, Elenchus Report, pg.18/Load Forecast Model, Economic Tab

a) The GDP forecast used in the Application is the average of the public forecasts from four major banks (BMO, TD, Scotiabank, and RBC, as of March 31, 2022). However, the Economic Tab in the Load Forecast model also includes a GDP forecast from CIBC. Why was CIBC excluded for purposes of the Application?

3.0-VECC -18

Reference: Exhibit 3, pages 23 and 25

a) For each of the GS>50 and LU classes please provide the 2022 monthly kWh, kW for each of months where the actual results are available.

3.0-VECC -19

Reference: Exhibit 3, Elenchus Report, page 28

a) Please explain why it is reasonable to use a kW/kWh ratio of 0.002739 for Street Lights when the actual ratio has exceeded this value in every year since 2014.

3.0-VECC -20

Reference: Exhibit 3, pages 29-31

a) Please provide versions of Table 33 that show: i) KHC's Residential kWh usage as a percentage of the total Provincial Residential kWh usage, ii) KHC's GS<50 kWh usage as a percentage of the total Provincial GS<50 kWh usage, iii) KHC's GS>50 kWh usage as a percentage of the total Provincial GS>50 kWh usage and iv) KHC's LU kWh usage as a percentage of the total Provincial LU kWh usage.

b) Are the 2021-2024 CDM Framework programs that target Commercial and Industrial Users just meant to apply to customers of LDCs or also to transmission-connected commercial and industrial customers that are not served by an LDC?

c) Is the KHC's Energy Affordability Program allocation based on the number of households in Kingston within the Low-Income Measure (after tax) as a share of: i) all Ontario households or ii) all Ontario households meeting the Low-Income Measure criteria?

d) Is Statistics Canada the source of the data for the number of households in Kingston within the Low-Income Measure (after tax)? If not, what is the source?

e) Please explain why the sum of the CDM class allocations in Table 35 does not equal the total CDM adjustment (6,292,485 kWh) in Table 34.

4.0 OPERATING COSTS (EXHIBIT 4)

4.0 -VECC -21
Reference: Exhibit 4, Tab 2, Schedule 1

a) Please explain how the estimates for "Miscellaneous Distribution Expense – Account 5085 were estimated for 2022 and 2023.

4.0 -VECC -22
Reference: Exhibit 4, Tab 2, Schedule 1, Appendix 2-JD

a) Please identify the amount included in each year for the amortized costs of the prior cost of service application in Appendix 2-JD (Account 5655 Regulatory Programs).
b) Please confirm (or correct) that $71,800 of the costs of this application are included in the costs of Account 5655 for 2022 (as per page 13 of 16). If this is correct why is the amount different that the 70k shown as 1/5 of the cost of the application in Appendix 2-M?
c) What were the costs of the research for a potential new distribution station in 2022?

4.0 -VECC -23
Reference: Exhibit 4, Tab 4, Schedule 1 / Appendix 2-K

a) Please amend Appendix 2-K to show the total employee costs capitalized in each year.
b) Please also identify in each year and by category (i.e., Management and Non-Management) the number of FTEs whose compensation is 100% charged to Kingston Hydro.

4.0 -VECC -24
Reference: Exhibit 4, Tab 4, Schedule 1, page 2 -3

a) KHC is proposing to add two incremental FTEs - an electrical engineer and a regulatory analyst. Are both of these FTEs anticipated as 100% charge to the distribution utility?

4.0 -VECC -25
Reference: Exhibit 4, Appendix 2-K

a) Please explain why the 2016 actual FTEs was 44 whereas that approved by the Board for the purpose of rates was 50.
b) Was the reduction in FTEs in 2020 and 2021 (by approximately 4 FTEs) related to the pandemic? If not please explain why in these years KHC was able to operate with a substantially smaller workforce.

4.0 -VECC -26
Reference: Exhibit 4, Appendix 2-k and Appendix 2-JD

a) Appendix 2-K shows 4 FTEs for the category of Management (including executive). Appendix 2-JD (OMA by Programs/Accounts) shows that in 2016 the actual Executive Salaries & Expenses was $164,721 and in 2023 it is estimated to be $323,777 an increase of almost 100%. Please explain this large increase in costs for what appears to be the same number of FTEs as in 2016.

4.0 -VECC -27
Reference: Exhibit 4, Tab 5, Schedule 1 page 16 – Appendix 2-JD MOA Programs/Account

a) Please provide KHC's tree trimming costs for each of 2016 through 2023 (forecast).
b) Please provide KHC's fleet service costs for the same years as above in a).
c) Under which USoA accounts are tree trimming and fleet service costs captured?

4.0 -VECC -28
Reference: Exhibit 4, Appendix 2-JD OMA Programs/Account

a) Please explain how the 2022 and 2023 bad debt expense was forecast.

4.0 -VECC -29
Reference: Exhibit 4, Appendix 2-JD OMA Programs/Account

a) Please explain why the amount for "Office Supplies and Expenses" (Account 5620) is significantly more in the 2022 (bridge) and 2023 (test) years than the actual amounts spent in the years 2016 through 2021.

4.0 -VECC -30
Reference: Exhibit 4, Appendix 2-M Regulatory Costs

a) For the $350,000 in one-time application costs please provide by the 7 categories shown in Appendix 2-M the amounts incurred to-date.
b) Please describe the nature of the consultant (92k) costs and what activity is intended to be captured under the OEB section 30 (23k) costs.
c) What was the actual invoiced OEB Annual Assessment costs in 2021 and 2022. If the actual amounts are, as shown in Appendix 2-M: $74.3k and $78.7k then please explain the increase in forecasted costs in 2023 to $126.8k.

5.0 COST OF CAPITAL AND RATE OF RETURN (EXHIBIT 5)

5.0-VECC-31

Reference: Exhibit 5, Tab 1, Schedule 2 / Appendix 2-OB

a) KHC expects to borrow $2 million in 2022 and has costed this at 4.57%. What is the proposal of the Utility with respect to updating this interest cost in this proceeding?
b) If the interest cost forecast in the evidence is to be utilized in the final order of the Board issued prior to the end of 2022 please provide the evidence relied upon for that interest cost rate.
c) Similarly, please provide the evidence relied upon to use 5.07% for the long-term debt issuance in 2023 ($1million and shown at half year of $500,000 in Appendix 2-OB).
d) Please explain the difference between the $2 million referenced in the evidence and the $1,983,581 shown in Appendix 2-OB.

5.0-VECC-32

Reference: Exhibit 5, Tab 1, Schedule 2 / Appendices 2_oA and 2-OB

a) KHC is overleveraged with a regulated rate Long-term Debt component of $36,931,698 as shown in Appendix 2-OA and a projected actual debt amount in 2023 of $38,441,614 as shown in Appendix 2-OB. Please explain how the resulting $1,509,916 is prorated or removed in the calculation of the overall cost of long term debt interest rate as shown calculated in Appendix 2-OB.
b) If KHC does not proposed to adjust the weighted cost of long-term debt for the overleveraging please provide the rationale.

6.0 CALCULATION OF REVENUE DEFICIENCY/SURPLUS (EXHIBIT 6)

6.0-VECC-33

Reference: Exhibit 6, Tab 3, pages 4-7

              Appendix 2-H

a) Please provide the 2019, 20202, 2021 and 2022 revenues for each of the accounts set out in Appendix 2-H for the first 6 months of each year.

7.0 COST ALLOCATION (EXHIBIT 7)

7.0-VECC-34

Reference: Exhibit 7, Tab 1, Schedule 1, page 2

a) With respect to the Service Weighting (Table 1), what is the difference between the Service assets provided by KHC to the Street Light class and the USL class such that the former has a weighting of zero while the latter has weighting of 0.2?

7.0-VECC-35

Reference: Exhibit 7, Tab 1, Schedule 1, pages 2-3

b) Please provide a copy of the analysis performed to develop the weighting factors for Billing and Collecting.

c) Does KHC's offer e-billing to its customers? If yes, please provide the most current data as to the number of customers in each class that are on e-billing.

7.0-VECC-36

Reference: Cost Allocation Model, Tabs I6.2, I7.1 and I7.2
                 Exhibit 7, Tab 1, Schedule 1, page 4

a) Please explain why Tab I6.2 shows 300 GS>50 customer but Tab I7.1 only reports 289 meters for the same class.

b) On page 4 KHC notes that it has a Standby Power Rate classification. Please indicate the number of Standby customers and whether any of these customers (by rate class) have KHC owned metering on their generator(s).

   i.   If any of these customers have KHC-owned metering on their generators, please indicate whether these meters are included in the meter counts used in Tab I7.1 and the meter reading counts used in Tab I7.2.

7.0-VECC-37

Reference: Exhibit 7, Cost Allocation Model, Tab I4 (BO Assets)

a) Please provide a schedule that compares the primary/secondary asset breakout in the current Application with that used in the utility's last COS Application for the following accounts: i) #1830, ii) #1835, iii) #1840 and iv) #1845. Please explain any material changes (i.e., greater than five percentage points).

7.0-VECC-38

Reference: Exhibit 7, Tab 2, Schedule 2, page 2

Preamble: The Application states:
"*As described in Exhibit 8, the total bill impacts for the Street Lighting rate class would exceed 10% so rates for the class are adjusted such that total bills increases are exactly 10% in 2023 and 2024, and a further increase in 2025 brings the class revenue to cost ratio of exactly 80%. Overall, after adjustments to General Service < 50 kW, Large Use, and Street Lighting (including mitigation), there is a revenue deficiency.*"

a) Please provide the 2023 total bill impact for the Street Lighting class assuming: i) the Status Quo ratio of 72.73% in maintained and ii) the Revenue to Cost Ratio is increased to 80%.

b) How did KHC determine the R/C ratio for 2024 that would yield a 10% total bill impact?

c) What would be the resulting 2024 and 2025 Revenue to Cost ratios for the GS>50 class if: i) the Street Lighting ratios were adjusted as proposed but ii) the reduction in the GS<50 class ratio was phased-in over two years?

7.0-VECC-39

Reference: Exhibit 7, Elenchus Report, page 4

Preamble: The Report states: "*In its 2016-2020 Custom IR application, Kingston Hydro used the load profiles provided by Hydro One in its cost allocation models.*"

a) Please provide a version of the 2023 Cost Allocation Model where the load profiles are based on those provided by Hydro One.

7.0-VECC-40

Reference: Exhibit 7, Elenchus Report, pages 4 & 8

Preamble: The Report states (page 4):"*Kingston Hydro has updated the load profiles for all rate classes.*"
The Report states (page 8): "*The Street Light class is not weather sensitive and as such its loads are not weather-normalized. The USL hourly load was assumed to have a constant load.*"

a) How was the updated Street Light class load profile determined?

b) Was USL load assumed to be constant 24/7?

　　i. If yes, what was the basis for this assumption?

　　ii. If not, over what hours was the load assumed to be "constant" and why?

7.0-VECC-41

Reference: Exhibit 7, Elenchus Report, pages 6-7

Preamble: The Application states (page 6):
"*The impact of HDDs and CDDs on hourly load is calculated with a regression of three years of actual hourly loads (2019 to 2021) on daily HDDs and CDDs. The regression results provide the estimated impact of a change in degree days on load.*"

The Application states (page 7):

"*Actual 2019 hourly load is adjusted by calculating the difference between actual daily temperatures and the corresponding ranked typical daily temperature (as identified in Figure 2) and applying the regression coefficient to the difference. The year 2019 was selected as the base year to scale to avoid irregular consumption patterns in 2020 and 2021 caused by the COVID-19 pandemic that are expected to diminish by the 2023 Test Year.*"

a) Why is it appropriate use 2020 and 2021 data to determine the impact of HDDs and CDDs on hourly load but not use 2020 or 2021 for purposes of calculating the load profiles for each class, particularly when the regression model used to determine the impact of HDD and CDD on load includes variables to account for the impact of COVID (per pages 6-7)?

b) Please provide the results (i.e., the 2023 CP and NCP values) for each customer class based on: i) adjusted 2020 data and ii) adjusted 2021 data.

7.0-VECC-42

Reference: Exhibit 7, Elenchus Report, page 7

Preamble: The Report states (page 7, footnote 2):

"*There are a total of 77 independent variables, however, the set of 72 for hourly HDD, hourly CDD and binary Hour variables have only three non-zero values in each observation. The values are 0 in each hour other than the HDD, CDD, and binary hour variables that correspond to the hour of the observation. This regression is similar to 24 regressions, one for each hour of the day.*"

a) Would the results be "exactly" the same if 24 separate regressions had been done – one for each hour of the day?

7.0-VECC-43

Reference: Exhibit 7, Elenchus Report, pages 6-7

Preamble: The Application states:
"*There are 24 variables for each of HDD and CDD, equal to the actual degree days in the corresponding hour, and 0 in all other hours. A set of 24 binary variables, equal to 1 in the corresponding hour and 0 in all other hours; COVIDHDD and COVIDCDD variables equal to 0 in all days until March 16, 2020 and equal to the relevant HDD or CDD in each hour thereafter; a trend variable; a Weekend or Holiday binary variable; and a Summer binary variable are also included. The resulting coefficients reflect the impact of one HDD or CDD that considers different impacts depending on the hour of the day.*"

a) Please confirm that by using binary variables to account for the impact of weekends and holidays as opposed to weekdays on load the model implicitly assumes that the impact of a change in HDD or CDD value is the same on weekends and holidays as it is on weekdays. If confirmed, please explain why this "assumption" is reasonable? If not confirmed, please explain why not.

8.0   RATE DESIGN (EXHIBIT 8)

8.0-VECC-44

Reference: Exhibit 8, Tab 2, Schedule 1, page 1
                 RTSR Workform

a) What year's data are used for the customer class billing kWh and kW in Tab 3 of the RTSR Workform?.

b) What year's data are used for the Network, Line Connection and Transformation Connection billing units used in Tabs 5, 6 and 7 of the RTSR Workform for the IESO and Hydro One?

8.0-VECC-45

Reference: Exhibit 8, Tab 2, Schedule 7, page 2

a) Please confirm that the LV kW forecast for 2023 (789,204 kW) is not actually used in the derivation of the 2023 LV cost.

b) If not confirmed, please explain how the kW forecast is used determining the 2023 LV cost.

DEFERRAL AND VARIANCE ACCOUNTS (EXHIBIT 9)

9.0 –VECC -46
Reference: Exhibit 9, Tab 1, Schedule 1, page 4

a) Please explain the rationale for continuation of the various COVID-19 accounts.

9.0 –VECC -47
Reference: Exhibit 9, Tab 1, Schedule 1, page 4

a) Please provide an explanation/description of the $93,670 in IFRS Transition Costs including when these costs were incurred.

End of document