



Ontario  
Energy  
Board | Commission  
de l'énergie  
de l'Ontario

**BY EMAIL**

September 14, 2022

Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto ON M4P 1E4

Dear Ms. Marconi:

**Re: EB-2022-0052 Application for 2023 Rates**

In accordance with Procedural Order #1, please find attached the Ontario Energy Board (OEB) staff interrogatories in the above proceeding. The applicant and intervenors have been copied on this filing.

Niagara-on-the-Lake Hydro Inc.'s responses to interrogatories are due by September 26, 2022.

Any questions relating to this letter should be directed to Kelli Benincasa at [Kelli.Benincasa@oeb.ca](mailto:Kelli.Benincasa@oeb.ca) or at 416-440-7624. The OEB's toll-free number is 1-888-632-6273.

Yours truly,

*Original Signed By*

Kelli Benincasa  
Incentive Rate Setting & Regulatory Accounting

Encl.

**OEB Staff Interrogatories  
Niagara-on-the-Lake Hydro Inc.  
EB-2022-0052**

Please note, Niagara-on-the-Lake Hydro Inc. (Niagara-on-the-Lake Hydro) is responsible for ensuring that all documents it files with the OEB, including responses to OEB staff interrogatories 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*.

**OEB Staff – 1**

**Ref: IRM Rate Generator Tab 20 Cells M32, M33 and M40**

OEB staff has updated the rate generator model on Tab 20 for the General Service 50 to 4,999 Classification and the Large Use Service Classification RTSR to Demand Interval.

**Question:**

a) Please confirm that these two updates are correct. Also, please note the slight increases to bill impacts.

**OEB Staff – 2**

**Ref: IRM Rate Generator Tab 2 Large Use Service Classification**

OEB staff has updated the Large Use Service Classification for the most up to date tariff on Tab 2.

**Question:**

a) Please confirm this is correct.

**OEB Staff – 3**

**Ref: IRM Rate Generator Tab 16 Stretch Factor Updated**

OEB staff has updated the Stretch Factor group from III to II.

**Question:**

a) Please confirm this is correct.

**OEB Staff – 4**

**Ref: IRM Rate Generator Tab 17, 19 and 20 Smart Meter Entity (SME) Charge**

OEB staff has updated the SME charge from \$0.43 to \$0.42.

**Question:**

a) Please confirm this is correct.

**OEB Staff – 5**

**Ref: Appendix 6, Conservation and Demand (CDM) Results;**

Niagara-on-the-Lake Hydro lists new CDM activity reported in 2020-2022 that it is including in its CDM results for the purposes of the Lost Revenue Adjustment Variance Account (LRAMVA).

**Question:**

Please clarify why Niagara-on-the-Lake Hydro is including a project led by Hydro One (ID # 203932) in its CDM results for the purposes of the LRAMVA.

**OEB Staff – 6**

**Reference:** Manager's Summary, section 3.2.6.1, table 27; [ENWIN 2023 IRM application](#) (EB-2022-0027); [Guidance on Prospective Lost Revenue Adjustment Mechanism \(LRAM\) Amounts – 2023 Rates](#)

Niagara-on-the-Lake Hydro notes a balance in the LRAMVA of \$61,835, including amounts for 2020-2022 and \$14,766 for prospective persistence savings for 2023, and proposes to dispose of this balance through a rate rider.

**Question:**

OEB guidance on prospective LRAM-eligible amounts indicates that LRAM-eligible amounts for 2023 or later should not be added to the LRAMVA, but should be recovered (in the appropriate rate year) through a separate rate rider, and adjusted by the OEB-approved annual adjustment factor (inflation minus x-factor) applicable to IRM applications in effect for a given year. Please modify Niagara-on-the-Lake Hydro's proposed approach to be consistent with this guidance (see for example, the "Prospective Disposition of CDM Results" section on pages 26-28 of ENWIN's current IRM application (EB-2022-0027), including Table 11) to propose a separate 2023 LRAM-Eligible Amount Rate Rider, or indicate why Niagara-on-the-Lake Hydro does not believe that approach is appropriate.