November 11, 2022

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

Dear Ms. Marconi,

Re: ENWIN Utilities Ltd.
2023 IRM Rate Application, EB-2022-0027
Comments on IRM Rate Generator Model Updates and Response to Ontario Energy Board Staff Question

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On November 7, 2022, ENWIN Utilities Ltd. ("ENWIN") received an updated 2023 IRM Rate Generator Model from Ontario Energy Board ("OEB") Staff containing certain updates to the IRM Rate Generator Model filed by ENWIN on August 3, 2022. OEB Staff requested that ENWIN review the model and advise of any further changes.

On November 7, 2022, ENWIN also received an additional written question from OEB Staff, requesting more detail pertaining to the project savings claims for two Save on Energy Process & Systems Upgrades Program projects contained in ENWIN's Lost Revenue Adjustment Mechanism Variance Account ("LRAMVA") claim.

Attached to this letter are the following:

- A summary of ENWIN's updates to the 2023 IRM Rate Generator Model provided by OEB Staff (Attachment 1)
    - ENWIN is requesting a further update to be made by OEB Staff to Tab. 19 - Final Tariff Schedule
- ENWIN's response to the additional written question from OEB Staff (Attachment 2)
- An updated 2023 IRM Rate Generator Model (Appendix B – Attachment 3)
- An updated LRAMVA Workform (Appendix F – Attachment 4) and 2018-2027 Persistence Report (Appendix G – Attachment 5) to reflect updated carrying charges, encompassing the OEB's Q4 2022 Prescribed Interest Rate

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

ENWIN Utilities Ltd.

M. Claire Bebbington
Director Regulatory Affairs, General Counsel & Corporate Secretary
ENWIN Utilities Ltd.
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c.c. Musab Qureshi

Encls.: Attachment 1 – Summary of Updates to 2023 IRM Rate Generator Model
Attachment 2 – Response to OEB Staff Follow-Up Question
Attachment 3 – Updated 2023 IRM Rate Generator Model (Appendix B)
Attachment 4 – Updated LRAMVA Workform (Appendix F)
Attachment 5 – Updated 2018-2027 Persistence Report (Appendix G)

2023 IRM Rate Generator Model Updates

Reference	Comment / Update
Tab 3. Continuity Schedule	Updated Column BQ (Projected 2022 interest on Dec.31, 2021 balances, adjusted for disposition during 2022) to reflect Q4 2022 OEB-prescribed interest rate of 3.87%.
Tab 4. Billing Det. For Def-Var	Updated Column S (1568 LRAM Variance Account Class Allocation) to reflect change to balance as a result of the Q4 2022 OEB-prescribed interest rate change to 3.87%.
Tab 5. Allocating Def-Var Balances	Allocation of Deferral and Variance Account balances automatically updated due to interest rate update.
Tab 6.1a GA Allocation	GA Transitional Amount monthly equal payments automatically updated to reflect adjusted deferral and variance account balance due to interest rate update.
Tab 6.1 GA Tab 7. Calculation of Def-Var RR	Rate riders automatically updated to reflect adjusted deferral and variance account balances noted above due to interest rate update.
Tab 16. Rev2Cost_GDPIPI	Confirmed updates made by OEB Staff for final 2023 OEB inflation rate of 3.7%.
Tab 17. Regulatory Charges	Confirmed updates made by OEB Staff to RPP rates effective November 1, 2022; Smart Meter Entity Charge; Wireline Pole Attachment Charge and Retail Service Charges.
Tab 18. Additional Rates	Confirmed updates made by OEB Staff to Prospective LRAM Disposition rates for final 2023 OEB inflation rate of 3.7%.
Tab 19. Final Tariff Schedule	**Further Change Required** Unmetered Scattered Load / Sentinel Lighting / Street Lighting Service Classifications • "Rate Rider for Disposition of Deferral/Variance Accounts (2023) – effective until December 31, 2023" o "(per connection)" should be included in line item naming for consistency with other fixed charges for these rate classes o Line item should be moved up beneath the other fixed ($) charges for consistency in presentation (fixed charges listed first ahead of volumetric charges)
Tab 20. Bill Impacts	• Bill impacts were updated to reflect the above changes, as applicable. • For the Large Use – Regular and Dedicated Transformer Station rate classes, the Loss Factor was changed to 1.0045, consistent with ENWIN's 2023 IRM Rate Generator Model filed August 3, 2022.

ENWIN Utilities Ltd.
EB-2022-0027

Staff Question-1

Can Enwin provide more detail (on a confidential basis if necessary) to support the project savings claims of the two large Save on Energy Process & Systems Upgrades Program projects undertaken in 2020 (Projects PI-601673 and SCP-600900, shown in Appendix H, rows 98 and 101).

ENWIN Response

Please see the additional detail below for Project SCP-600900:

- Projected Gross Electricity Savings per Project Measurement and Verification Report

Table 5. Calculation of Projected Electricity Savings

Description	Value	Unit
Projected Reporting Period Energy	5,409	MWh/year
Projected Annualized Electricity Savings	5,409	MWh/year
Projected Summer Peak Demand Savings	628	kW
Projected Electricity Savings as a Percentage of Anticipated Electricity Savings	96%	

- Calculation of Net Savings

Energy

5,409 MWh (Projected Annualized Electricity Savings) * 1.19298618 (Combined Net-to-Gross Adjustment & Realization Rates - Energy[1]) = 6,453 MWh

[1] Per 2017 Final Verified Results Report - Appendix H, Tab 3, Cell F15 (Save on Energy Process & Systems Upgrades Program)

Demand

628 kW (Projected Summer Demand Savings) * 2.19477912(Combined Net-to-Gross Adjustment & Realization Rates - Demand[2]) = 1,378 kW

Please see the additional detail below for Project PI-601673:

- Gross Electricity Savings per Project Measurement and Verification Report

Table 4. Electricity Savings

Description	Value	Unit	Comment
Reporting Period Energy	58,654	MWh	Obtained from Table 3.
Non-Routine Adjustment	0	MWh	None.
Electricity Savings	58,654	MWh	
Uncertainty of the Electricity Savings	± 2.5%		The Uncertainty is mostly due to the accuracy of the meters.
Anticipated Electricity Savings	67,420	MWh	Per the M&V Plan.
Electricity Savings as Percentage of Anticipated Electricity Savings	87%		
Average Demand Savings	6,696	kW	Obtained from Table 3.
Summer Peak Demand Savings	6,539	kW	Summer peak demand period is defined as Monday to Fridays, 1:00 pm - 7:00 pm, June 1 to August 31.

- Calculation of Net Savings

Energy

58,654 MWh (Electricity Savings) * 1.19298618 (Combined Net-to-Gross Adjustment & Realization Rates - Energy[3]) = 69,973 MWh

Demand

6,696 kW (Average Demand Savings) * 2.19477912 (Combined Net-to-Gross Adjustment & Realization Rates - Demand[4]) = 14,696 kW

[2] Per 2017 Final Verified Results Report - Appendix H, Tab 3, Cell G15 (Save on Energy Process & Systems Upgrades Program)
[3] Per 2017 Final Verified Results Report - Appendix H, Tab 3, Cell F15 (Save on Energy Process & Systems Upgrades Program)
[4] Per 2017 Final Verified Results Report - Appendix H, Tab 3, Cell G15 (Save on Energy Process & Systems Upgrades Program)