

GREATER SUDBURY HYDRO INC.
2023 Electricity Distribution Rate Application
EB-2022-0034
Effective May 1, 2023

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

AND IN THE MATTER OF an
Application by Greater Sudbury
Hydro Inc for an Order or Orders
pursuant to section 78 of the
Ontario Energy Board Act, 1998
for 2023 distribution rates and
related matters.

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DOCUMENTS AND LIVE MODELS FILED IN SUPPORT OF THE APPLICATION

1. CURRENT TARIFF OF RATES AND CHARGES
2. 2023 IRM RATE GENERATOR MODEL (EXCEL)
3. 2023 GA ANALYSIS WORKFORM (EXCEL)
4. 2023 LRAMVA WORKFORM (EXCEL)
5. 2023 REVENUE TO COST ADJUSTMENT MODEL (EXCEL)
6. PROPOSED TARIFF OF RATES AND CHARGES (EXCEL)

APPLICATION

1. The Applicant is Greater Sudbury Hydro Inc. ("GSHI"). GSHI is a licensed electricity distributor operating pursuant to license ED-2002-0559. GSHI distributes electricity to approximately 47,865¹ customers within parts of Greater Sudbury (former City of Sudbury, Town of Coniston, Town of Capreol and Town of Falconbridge) and parts of the Municipality of West Nipissing (Town of Sturgeon Falls and Town of Cache Bay).
2. GSHI hereby applies to the Ontario Energy Board (the "Board") for an order or orders made pursuant to Section 78 of the *Ontario Energy Board Act, 1998* as amended, (the "OEB Act") approving just and reasonable rates for the distribution of electricity based on a 2023 Price Cap Incentive Rate-Setting (IRM) application, effective May 1, 2023.
3. Specifically, GSHI hereby applies for an order or orders granting distribution rates updated and adjusted in accordance with Chapter 3 of the Filing Requirements for Electricity Distribution Rate Applications updated May 24, 2022 ("Filing Requirements"), including the following:
 - a. An adjustment to the retail transmission service rates as provided in Guideline (G-2008-0001) on Retail Transmission Service Rates – October 22, 2008 (Revision 4.0 June 28, 2012);
 - b. The continuation of the Low Voltage Service charges, Wholesale Market Service Rate, Rural Rate Protection Charge;
 - c. The continuation of the Standard Supply Service Charge, Specific Service Charges, microFIT Service Charge, Transformation and Primary Metering Allowances, and Loss Factors as approved in the 2020 Cost of Service Application EB-2019-0037;
 - d. The continuation of the Retail Service Charges and the Specific Charge for Access to the Power Poles as approved in the 2020 Cost of Service application EB-2019-0037 and updated annually by the Board (For 2023: EB-2022-0220 and EB-2022-0221).

¹ 2021 Electricity Reporting & Record Keeping Requirements (RRR): Section 2.1.5.5 Utility Characteristics

- e. The continuation of the Smart Metering Entity Charge as specified by Independent Electricity System Operator Smart Metering Entity application (For 2023: EB-2022-0137);
 - f. Proposed new Rate Riders for disposition of the Lost Revenue Adjustment Mechanism Variance Account proposed to be effective until April 30, 2024,
 - g. The continuation of the rate rider for recovery of the Advanced Capital Module (2021) proposed to be effective until the effective date of the next cost of service based rate order
 - h. The continuation of the Rate Rider for Disposition of Account 1575 (2020) proposed to be effective until April 30, 2025.
4. This Application is supported by written evidence that may be amended from time to time, prior to the Board's final decision on this Application.
5. In the preparation of this application, GSHI has utilized five Excel models:
- a. 2023 IRM Rate Generator Model
 - b. 2023 GA Analysis Workform
 - c. 2023 Generic LRAMVA Workform
 - d. 2023 Revenue Cost Ratio Adjustment Model
- all developed and provided by the Board and as listed on the Board's website.
6. In the event that the Board is unable to provide a Decision and Order in this Application for implementation by the Applicant as of May 1, 2023, GSHI requests that the Board issue an Interim Rate Order declaring the current Distribution Rates and Specific Service Charges as interim until the decided implementation date of the approved 2023 distribution rates. GSHI also requests that it be permitted to recover the incremental revenue from the effective date to the implementation date, in the event that the effective date does not coincide with the Board's decided implementation for the 2023 distribution rates and charges.
7. The undersigned certifies, to the best of her knowledge, that the evidence filed, including the models and appendices, is accurate, consistent, and complete.

8. The undersigned certifies that GSHI has robust processes and internal controls in place for the preparation, review, verification, and oversight of the account balances being disposed. The undersigned also certifies that the evidence filed is accurate, consistent, and complete to the best of her knowledge.
9. The undersigned certifies, to the best of her knowledge, that the evidence filed in support of this application does not include any personal information, as identified in the certification requirements for personal information in Chapter 1 of the filing requirements.
10. The Applicant requests that a copy of all documents filed with the Board in this proceeding be served on the Applicant as follows:

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Dated at Sudbury, Ontario, this 22nd day of November, 2022

Original signed by

Catherine Huneault, CPA, CGA
VP – Corporate Services & CFO
Greater Sudbury Hydro Inc.

MANAGER'S SUMMARY

OVERVIEW

Greater Sudbury Hydro Inc. (GSHI) is a licensed electricity distributor operating pursuant to license ED-2002-0559. GSHI distributes electricity to approximately 47,865² customers within parts of Greater Sudbury (former City of Sudbury, Town of Coniston, Town of Capreol and Town of Falconbridge) and parts of the Municipality of West Nipissing (Town of Sturgeon Falls and Town of Cache Bay) all of whom will be impacted by this application.

GSHI's last Cost of Service Application was for distribution rates effective May 1, 2020 (EB-2019-0037); a full settlement was reached and the Board issued a Decision approving the settlement and corresponding Rate Order on May 7, 2020.

On November 3rd, 2021, GSHI filed a 2022 Price Cap Incentive Regulation Mechanism (Price Cap IR) (EB-2021-0026) seeking approval for changes to distribution rates. The Board issued a Decision and Rate Order on March 24th, 2022. A copy of the current Tariff of Rates and Charges with an effective date of May 1st, 2022 is included as Attachment 1

This application has been prepared in accordance with the "Filing Requirements for Electricity Distribution Rate Applications – 2022 Edition for 2023 Rate Applications – Chapter 3, Incentive Rate Setting-Applications, updated on May 24, 2022" ("Filing Requirements") issued by the Board. GSHI utilized the 2023 IRM Rate Generator Model, 2023 GA Analysis Workform, 2023 Generic LRAMVA Workform and the 2023 Revenue Cost Ratio Adjustment Model issued by the Board and posted on the 2023 electricity distribution rate applications page on the Board's website. The completed models are included with GSHI's submission. GSHI confirms the accuracy of the billing determinants and other RRR data pre-populated in the Rate Generator Model, with the exception of the account 1595 breakdowns as discussed in the Deferral and Variance Accounts section below.

A link to this application can also be found on GSHI's website at the following location:
<https://sudburyhydro.com/regulatory/>

² 2021 Electricity Reporting & Record Keeping Requirements (RRR): Section 2.1.5.5 Utility Characteristics

1 **SUMMARY OF SUBMITTED DOCUMENTS**

- 2 1. Manager’s Summary (PDF format) - *GSHI_2023_IRM_APPL_SUMM_20221122.pdf*
- 3 2. Current Tariff of Rates and Charges (PDF format) –
- 4 *GSHI_2023_IRM_Current_Tariff_of_Rates_and_Changes_20221122.pdf*
- 5 3. 2023 IRM Rate Generator Model (Excel format) –
- 6 *GSHI_2023_IRM_Rate_Generator_Model_20221122.xlsb*
- 7 4. 2023 GA Analysis Workform (Excel format) -
- 8 *GSHI_2023_IRM_GA_Analysis_Workform_20221122.xlsb*
- 9 5. 2023 Lost Revenue Adjustment Mechanism Variance Account (LRAMVA) Work Form
- 10 (Excel Format) – *GSHI_2023_IRM_Generic_LRAMVA_Workform_20221122.xlsx*
- 11 6. 2023 Revenue Cost Ratio Adjustment Model (Excel format) –
- 12 *GSHI_2023_IRM_Revenue_Cost_Ratio_Adjustment_Model_20221122.xlsm*
- 13 7. 2023 Proposed Tariff of Rates and Charges (PDF format) –
- 14 *GSHI_2023_IRM_Proposed_Tariff_of_Rates_and_Charges_20221122.pdf*
- 15 8. 2023 IRM Checklist – *GSHI_2023_IRM_Checklist_20221122.xlsx*

1 **REVENUE-TO-COST RATIO ADJUSTMENT**

2 Included in GSHI’s 2020 Cost of Service application (EB-2019-0037) decision, GSHI was approved
3 to phase in an adjustment to certain Revenue to Cost Ratios. Table 1 that follows is an excerpt
4 from the Decision and Order dated May 7, 2020 summarizing the approved adjustments:

5 **Table 1 Summary of 2020 – 2024 Revenue to Cost Ratios**

Rate Class	Settlement Proposal				
	2020	2021	2022	2023	2024
Residential	91.59%	91.95%	92.32%	92.69%	93.06%
GS < 50 kW	118.66%	118.66%	118.66%	118.66%	118.66%
GS > 50 kW	109.46%	109.46%	109.46%	109.46%	109.46%
Street Light	184.47%	168.35%	152.24%	136.12%	120.00%
Sentinel Light	78.69%	82.28%	85.87%	89.47%	93.06%
USL	100.10%	100.10%	100.10%	100.10%	100.10%

6
7 GSHI used the 2023 IRM Revenue Cost Ratio Adjustment Model to adjust the rates and
8 populated the results of the model into tab 16 of the Rate Generator Model. GSHI notes a
9 small imbalance of \$17 exists in the Revenue to Cost Ratio model on tab 10. The macro buttons
10 produced errors that GSHI was not able to rectify. Given the immaterial nature of the
11 imbalance, GSHI has filed the model with the imbalance and is willing to work with Board Staff
12 to correct if necessary, during the processing of this application.

13

14 **RETAIL TRANSMISSION SERVICE RATES**

15 GSHI has completed the input fields on Sheet 12 of the Rate Generator model relating to Retail
16 Transmission Service Rates (RTSR). GSHI is charged RTSR’s from both the Independent Electricity
17 System Operator and Hydro One.

18 As indicated in the Filing Requirements, GSHI understands that the model reflects the most
19 recent Uniform Transmission Rates (UTR’s) approved by the Board for 2022 and that Board Staff
20 will adjust each distributor’s model when the 2023 UTR’s have been determined.

1 **DEFERRAL AND VARIANCE ACCOUNTS**

2 GSHI completed Sheet 3 of the Rate Generator model titled "Continuity Schedule". GSHI notes
3 that variances exist in column BW of this sheet.

4 Account 1580 – Variance of -\$293,719

5 During preparation of this application GSHI noted that the 2020 balance of (\$172,700) in account
6 1580 – Variance WMS – Subaccount CBR Class B was submitted with the incorrect sign during
7 GSHI's 2020 2.1.7 RRR filing. This was not identified during the preparation of the 2022 IRM
8 application and therefore, the incorrect amount was disposed. To rectify, GSHI has input two
9 principal adjustments in column BF of account 1580 – Variance WMS – Subaccount CBR Class B
10 that are reflected in account 1580 – RSVA Wholesale Market Service Charge. The first adjustment
11 of (\$172,700) reverses the effect of the balance submitted as a debit position in 2020. The second
12 adjustment of (\$170,395) reflects the correct balance and sign that would have been carried
13 forward from the 2022 IRM. Resulting in a total adjustment of (\$343,095) in account 1580 –
14 Variance WMS – Subaccount CBR Class B, that is reflected in account 1580 – RSVA Wholesale
15 Market Service Charge.

16 Account 1589 – Variance of -\$1,003, 569

17 The variance of \$1,003,569 in account 1589, is due to a global adjustment rate error used to
18 perform GSHI's RPP true ups. See Global Adjustment section below for further details.

19 Account 1595 (2017) – Variance of -\$721

20 During the preparation of GSHI's 2022 IRM application, GSHI noted an error in the carrying charge
21 calculation for this account. GSHI recorded an interest adjustment of \$721 in it's 2021 GL that
22 was erroneously left out of the 2022 IRM rate generator model. Therefore, the adjustment of
23 \$721 was not included in the balance approved for disposition during 2022. GSHI has written off
24 this amount in it's 2022 GL to correctly reflect a \$nil balance in the 1595 - Disposition and
25 Recovery/Refund of Regulatory Balances (2017) account.

26 Account 1595 (2019) and (2020) – Variance of \$687,280

27 GSHI noted a reclassification variance in account 1595 – Disposition and Recovery/Refund of
28 Regulatory Balances (2019) and (2020) of \$687,280. During the submission of GSHI's 2021 2.1.7
29 RRR filing an error occurred in the group 1 accounts additional table which incorrectly classified

1 an amount totaling \$687,280 with the 1595 - Disposition and Recovery/Refund of Regulatory
2 Balances (2019) accounts, when it should have been grouped with 1595 - Disposition and
3 Recovery/Refund of Regulatory Balances (2020) accounts. No correction is required in GSHI's GL,
4 however GSHI will file a RRR revision request to correct the supplementary information table.

5 Account 1568 – Variance of \$70,804

6 The variance of \$70,804 in Account 1568, is due to a 2021 principal and interest claim booked in
7 the GL in 2022, see LRAMVA section below for further discussion.

8

9 **GLOBAL ADJUSTMENT**

10 The OEB's filing requirements require each distributor to complete the Global Adjustment ("GA")
11 Analysis Workform to determine whether the balance in Account 1589 GA is reasonable. The
12 Workform compares the general ledger principal balance to an expected principal balance based
13 on monthly GA volumes, revenues and costs. Distributors compare the actual and expected
14 balances and explain the associated reconciling items. Any unexplained discrepancy greater than
15 +/- 1% of the total annual IESO GA charges is assessed by the OEB for materiality and may prompt
16 further analysis before disposition approval. Please refer to the live completed GA Analysis
17 Workform submitted as part of this application.

18 GSHI completed the GA analysis Workform for the 2023 IRM and performed analysis over the
19 expected balance in GA 1589. An unresolved difference existed which exceeded the acceptable
20 threshold in the form and so GSHI performed further analysis to determine the cause. GSHI
21 determined that RPP Class B true ups performed for all months of 2021 were calculated using a
22 blended GA rate for actual GA paid. The blended rate included both GA deferral recovery
23 amounts and GA amounts charged in the year, divided by total Class B GA purchased kWh.
24 However, the RPP Class B GA rate used for true up purposes should not have included GA deferral
25 recovery amounts as these amounts are intended to be charged only to non-RPP Class B
26 customers.

27 GSHI re-calculated true ups for each month of 2021 correcting for the rate and the result is a
28 \$1,003,569 adjustment to the amount GSHI owes the IESO for Class B GA. The offset will impact

1 what remains in account 1589, Non-RPP GA deferral amounts and is therefore a reconciling item
2 on the 2023 IRM GA Analysis Workform.

3 While GSHI regrets that this calculation error occurred for RPP true ups performed throughout
4 2021, GSHI will submit post-final adjustments for each month of 2021 in the November 2022 IESO
5 submission. This will fully correct for this issue prior to the future disposition of the 1589 GA
6 account and no customer will have been impacted by this oversight. GSHI is including the
7 \$1,003,569 as a principal adjustment on the IRM continuity schedule for purposes of determining
8 whether a rate rider for disposition is required in 2023 and notes that the disposition threshold
9 is not met whether this adjustment is included or not. After the above-mentioned reconciling
10 item, the completed Workform results in an unresolved difference of -\$58,660 equating to a -
11 0.3% difference, which is within the Board's +/- 1% threshold.

12

13 **CBR**

14 Consistent with the Accounting Procedures Handbook, GSHI has continued to record Capacity
15 Based Recovery ("CBR") charges and revenues separately for Class A and Class B customers in
16 their respective Account 1580 subaccounts. GSHI previously disposed of Account 1580,
17 Subaccount Class B in its 2022 IRM which consist of the balances at December 31, 2019.

18 GSHI understands that no balance should exist in 1580 sub account CBR Class A.

19 Accordingly, there is no Class A CBR balance to dispose of in this Application.

20

21 **LOST REVENUE ADJUSTMENT MECHANISM VARIANCE ACCOUNT**

22 GSHI's LRAMVA claim for the years 2021 and 2022 is -\$71,691.55, including carrying charges to
23 April 31, 2023. GSHI has attached a live LRAMVA Workform with this application.

24 GSHI's 2020 Cost of Service application (EB-2019-0037) settlement included 6.0 GWh and 10,432
25 kW of savings for the 2020 LRAMVA threshold. GSHI's last LRAMVA claim in EB-2020-0024
26 included programs up to 2019. The LRAMVA threshold established in the 2020 COS was based on
27 a list of outstanding projects at that time. Many of these projects were not completed which has
28 caused actual savings to be lower than forecast, resulting in the negative LRAMVA claim. GSHI

1 confirms that it has relied on the most recent input assumptions at the time of program
2 evaluation.

3 GSHI's savings results are based on the April 2019 Participation & Cost Report provided by the
4 IESO, an LED conversion report provided by the municipality, and derived 2019 and 2020 savings
5 of projects for which there was a contractual agreement prior to April 2019. Savings in 2021 and
6 2022 have been derived based on forecast energy and demand savings of each completed
7 project, adjusted by net-to-gross ratios and realization rates from the Program Year 2017
8 Evaluation Report on CFF programs. There are no new projects in 2021 or 2022, or adjustments
9 to savings from 2019 or 2020. Calculated lost revenues are based on the same savings figures
10 used in GSHI's 2020 LRAMVA claim (2022 IRM EB-2021-0026).

11 Net incremental peak demand savings for two 2019 projects that persist to 2020 are not provided
12 in the April 2019 Participation and Cost Report. For the Save on Energy Heating and Cooling
13 program, the average kW to kWh ratio of the program's historic savings is applied to the 2019
14 net incremental energy savings to approximate 2019 net incremental demand savings. The other
15 program, Instant Savings Program, is fully attributable to the Residential class so no kW savings
16 values are required.

17 The City of Greater Sudbury began a project to replace HPS and LPS lights with LED lights in 2020.
18 Additional sheets have been added to the LRAMVA workform to include summaries of the LED
19 replacement project data provided by the municipality. The list of replacements included only
20 lights that were replaced as part of the LED conversion project. This information is unchanged
21 from the data provided in GSHI's approved 2020 LRAMVA claim.

22 The counts of each type of HPS and LPS fixture replaced, and corresponding demand is calculated
23 in tab '8-a. HPS-LPS Replaced'. The counts of replacement LED fixtures and corresponding
24 demand is calculated in '8-b. LED Replacements'. The difference between the replaced HPS/LPS
25 lights and new LED lights is provided in '8-c. Difference Summary'. The column labeled
26 "Cumulative Difference" provides the gross demand savings at the start of each month. Demand
27 savings for the same month are not included because billed demand would not decline until the
28 following month. Summary pre-conversion, post-conversion, demand savings, and consumption

1 savings data is provided in tab '8. Streetlighting'. An 85.2% Net-to-Gross ratio has been applied
2 to the gross demand savings calculated in the new Streetlighting tabs.

3 Carrying charges totaling -\$2,066.71 have been calculated to the end of April 2023 with the OEB's
4 Approved Deferral and Variance Accounts prescribed interest rates. The rates in 2023 Q1 and
5 2023 Q2 are not yet available so the 2022 Q4 rate of 3.87% is used in those periods.

6 GSHI has not made any adjustments to previously claimed LRAMVA amounts. No changes have
7 been made to the LRAMVA Workform, except for replacing unused programs with programs that
8 are used but not listed in tabs 5, extending carrying charges to April 2023, and adding extra sheets
9 to provide streetlight savings details.

10 GSHI's Instant Discount program is allocated 100% to the Residential class. Retrofit, Small
11 Business Lighting, and High Performance New Construction programs are allocated to General
12 Service rate classes based on the energy/demand savings of projects attributable to each class
13 within the program. For each program in a given year, total energy savings of projects undertaken
14 by General Service < 50 kW class are evaluated against the total energy savings among all classes
15 in that program and total demand savings of the General Service 50 to 4,999 kW are evaluated
16 against total demand savings in the program. This process used project data from the IESO-
17 provided Final Verified Annual LDC CDM Program Results Project List Generator. A similar method
18 was used prior to the Conservation First Framework with data tracked by GSHI on a best-efforts
19 basis.

20 GSHI's LRAMVA claim for 2021 and 2022 is -\$71,691.55 as depicted in Table 2 below.

21

1

Table 2 LRAMVA Claim Summary

Rate Class		2021	2022	Carrying Charges	Total Claim by Class
Residential	Actual	\$0	\$0	\$0	\$0
	Forecast	\$0	\$0		
GS < 50 kW	Actual	\$16,864	\$17,327	(\$1,412)	(\$48,745)
	Forecast	(\$40,211)	(\$41,313)		
GS > 50 kW	Actual	\$18,072	\$18,549	(\$2,042)	(\$70,468)
	Forecast	(\$51,840)	(\$53,207)		
USL	Actual	\$0	\$0	\$0	\$0
	Forecast	\$0	\$0		
Sentinel Lighting	Actual	\$0	\$0	\$0	\$0
	Forecast	\$0	\$0		
Street Lighting	Actual	\$23,892	\$22,241	\$1,387	\$47,521
	Forecast	\$0	\$0		
Total	Actual	\$58,829	\$58,117	(\$2,067)	(\$71,692)
	Forecast	(\$92,051)	(\$94,520)		

2

3 GSHI is proposing to dispose of these amounts over a 1-year period through rate riders between
4 May 1st, 2023 to April 30th, 2024. Table 3 below outlines the proposed disposition.

5

Table 3 Proposed Rate Riders

Rate Class	Billing Unit	Principal	Carrying Charges	Total LRAMVA	Load Forecast	Proposed Rate Rider
Residential	kWh				374,569,367	
GS < 50 kW	kWh	(\$47,333)	(\$1,412)	(\$48,745)	127,942,204	(\$0.0004)
GS > 50	kW	(\$68,426)	(\$2,015)	(\$70,468)	776,218	(\$0.0908)
USL	kWh				987,840	
Sentinel Lighting	kW				967	
Street Lighting	kW	\$46,134	\$1,387	\$47,521	10,103	\$4.7035
Total		(\$69,625)	(\$2,067)	(\$71,692)		

6

7 Prospective Disposition

8 GSHI's prospective disposition based on persistence of savings implemented in 2019 and 2020
9 and approved 2022 distribution rates is provided below. GSHI's last COS was for 2020 rates so its
10 next scheduled Cost of Service application is for 2025 rates. GSHI's LRAM – Eligible Amounts for
11 Prospective Disposition is included in Table 4 below.

12

1

Table 4 Eligible Amounts for Prospective Disposition

Rate Class	2023	2024	2025	2026	2027
Residential	\$0	\$0	\$0	\$0	\$0
GS < 50 kW	(\$23,986)	(\$24,679)	(\$25,122)	(\$25,122)	(\$25,167)
GS > 50	(\$34,658)	(\$34,832)	(\$35,970)	(\$35,970)	(\$35,970)
USL	\$0	\$0	\$0	\$0	\$0
Sentinel Lighting	\$0	\$0	\$0	\$0	\$0
Street Lighting	\$22,241	\$22,241	\$22,241	\$22,241	\$22,241
Total	(\$36,403)	(\$37,271)	(\$38,851)	(\$38,851)	(\$38,896)

2

3 **SHARED TAX SAVINGS**

4 As described in the Filing Requirements, Board policy (included in *Supplemental Report of the*
5 *Board on 3rd Generation Incentive Regulation for Ontario’s Electricity Distributors*) prescribes a
6 50/50 sharing of impacts of legislated tax changes from distributors’ tax rates embedded in its
7 Board approved base rate known at the time of application. The corporation tax rate for the
8 2023 year as included in Sheet 8 of the Rate Generator model does not differ from the tax rate
9 approved in GSHI’s 2020 Cost of Service Application (EB-2019-0037) and as such no sharing of tax
10 savings is applicable.

11

12 **PRICE CAP ADJUSTMENT**

13 GSHI has been assigned a Stretch Factor Group of III as per the Pacific Economics Group (PEG)
14 report entitled “Empirical Research in Support of Incentive Rate-Setting: 2021 Benchmarking
15 Update”. Consistent with this report and the Scorecard issued by the OEB in August 2022, GSHI
16 has updated the Rate Generator to reflect the stretch factor group of III. With this data, the Rate
17 Generator model has calculated an adjustment of 3.4% to base distribution rates based on a price
18 escalator of 3.7%, less a productivity factor of 0.0% and stretch factor of 0.30%. GSHI has
19 updated the price escalator in the IRM model on tab 16.

20

21

1 **BILL IMPACTS**

2 Based on the Proposed Rates and Tariff Schedules included with this application
3 (GSHI_2023_IRM_Proposed_Tariff_of_Rates_and_Charges_20221122), bill impact have been
4 prepared for all rate classes at Bill impacts have been prepared for all rate classes at varying
5 consumption levels as appropriate for GSHI’s customer base and are included on tab 20 of the
6 IRM Rate Generator Model (Attachment 2). The Bill Impacts have also been summarized in Table
7 5 below.

8 For the Streetlighting class, GSHI has utilized the consumption and demand of a typical bill for its
9 Municipality. The impact has been calculated using all connections for the Municipality rather
10 than a single connection.

11 **Table 5 – Summary of Bill Impacts**

Customer Class	Volume		Distribution Charges		Delivery Charges		Total Bill	
	kWh	kW	\$Change	%Change	\$Change	%Change	\$Change	%Change
Residential RPP	750		\$ 0.50	1.4%	\$ 0.43	0.9%	\$ 0.41	0.3%
GS<50kW RPP	2,000		\$ -	0.0%	\$ (0.21)	-0.2%	\$ (0.20)	-0.1%
GS<50kW Non-RPP	68,500	190	\$ (157.54)	-10.8%	\$ (175.72)	-5.8%	\$ (198.56)	-1.7%
USL RPP	500		\$ 0.08	0.4%	\$ 0.03	0.1%	\$ 0.03	0.0%
Sentinel Lighting RPP	162	0.21	\$ 1.01	6.6%	\$ 1.00	6.1%	\$ 0.96	2.9%
Streetlighting Non-RPP	507,000	1,605	\$ 1,873.47	3.7%	\$1,795.63	3.1%	\$ 2,029.06	1.6%
Residential RPP	219		\$ 0.98	2.9%	\$ 0.96	2.6%	\$ 0.92	1.6%
Residential Non-RPP	750		\$ (0.70)	-1.8%	\$ (0.77)	-1.6%	\$ (0.87)	-0.6%
Residential Non-RPP	219		\$ 0.63	1.9%	\$ 0.61	1.6%	\$ 0.69	1.0%

12
13
14 **OTHER ITEMS**

15 GSHI is not including any Z-Factor claims as part of this application.

16 GSHI is not including an Incremental Capital Module as part of this application.

17
18 **SUMMARY OF REQUIRED CHANGES**

19 The following is a summary of changes GSHI respectfully requests Board Staff to update prior to
20 finalization of this Rate Application.

- 1 1) GSHI requests that the new Smart Meter Charge of \$0.42 per smart meter per month
2 from January 1, 2023 to December 31, 2027 (EB-2022-0137) to be updated on the
3 Proposed Tariff Sheets and Bill Impact schedule.
- 4 2) GSHI understands that Board Staff will adjust the Rate Model for the 2023 UTR's once
5 they have been determined.