#### Responses to VECC Interrogatories January 13, 2023

EB-2022-0056 Orangeville Hydro Limited Application for electricity distribution rates and other charges effective May 1, 2023

VECC-1

Ref: Application p. 16

The evidence states "Orangeville Hydro last adjusted its Low Voltage rate in its 2014 Cost of Service Application (EB-2013-0160). Since that time, the Low Voltage amounts paid to the host distributor have increased significantly annually. Orangeville Hydro has used the same approach that the IRM model uses to adjust RTSR rates."

a) Please describe the methodology used.

#### Response:

Orangeville Hydro utilized the same methodology as the September 14, 2022 RTSR workform from the OEB website to update the LV rates. To calculate the LV costs, in a separate spreadsheet, Orangeville Hydro completed a summary showing the historical 2021 LV costs in tab LV-Historical 2021. In the following tab LV-Current 2022, the current 2022 LV costs were entered, using the billed demand values and 2022 rates from the Hydro One monthly invoice, except for December 2022 demand values which had not been received yet (Orangeville Hydro used December 2021 demand multiplied by 2022 Hydro One rates). In the third tab LV Forecast 2023, the forecast LV costs were entered. For the forecast costs to be calculated, the same demand was used from the LV-Current 2022 tab, with updated 2023 Hydro One rates from EB-2021-0110. When the IRM was originally submitted on October 12, 2022, an estimate of 2023 Hydro One rates was used. Included with these Interrogatory responses, the LV rates in tab LV Forecast 2023 have been updated to reflect the approved Hydro One tariff for Sub transmission rates in EB-2021-0110. This provides final forecasted LV costs for 2023 of \$835,475.

Summar	y of	Hydro One	Bill	ls for 202	21 -	- actual				47500-00-000									
	-									47500-00-001									
		HYDRO ONE BILL	-																
		Earning Shared	Earr	ning Shared	Defer	erred	Defen	red		Monthly Service		LVDS - Low		Volumetric Rate		Com	mon ST Lines	Tota	al LV
		Mechanism Vol Rider	Mec	hanism Vol Rider	Tax A	Asset Vol Rider	Тах А	Asset Fixed Rider		Charge				Rider #29A					
Jan	Qty		5	1		1		5		5		1							
Jan	Rate	\$ (15.70	)	-0.0219	)	0.054		36.18		582.74		1.6671		\$ 0.9444			1.5335		
July-	Qty																		
July-	Rate																		
January		\$ (78.50	)\$	(881.65)	)					\$ 2,913.70	2,258.88	\$ 3,765.78	40,257.94	\$ 38,019.60	40,257.94	\$	61,735.56	\$	105,474.49
February		\$ (78.50	)\$	(900.63)	)					\$ 2,913.70	2,328.43	\$ 3,881.73	41,124.52	\$ 38,838.00	41,124.52	\$	63,064.45	\$	107,718.75
March		\$ (78.50	)\$	(860.95)	)					\$ 2,913.70	2,065.71	\$ 3,443.75	39,312.71	\$ 37,126.92	39,312.71	\$	60,286.04	\$	102,830.96
April		\$ (78.50	)\$	(765.52)	)					\$ 2,913.70	1,881.82	\$ 3,137.18	34,955.35	\$ 33,011.83	34,955.35	\$	53,604.03	\$	91,822.72
May		\$ (78.50	)\$	(904.81)	)					\$ 2,913.70	1,834.35	\$ 3,058.04	41,315.75	\$ 39,018.59	41,315.75	\$	63,357.70	\$	107,364.72
June		\$ (78.50	)\$	(1,062.03)	)					\$ 2,913.70	2,345.87	\$ 3,910.80	48,494.50	\$ 45,798.21	48,494.50	\$	74,366.32	\$	125,848.50
July		\$ (78.50	)\$	(1,031.65)	) \$	2,543.80	\$	180.90		\$ 2,913.70	2,372.47	\$ 3,955.14	47,107.44	\$ 44,488.27	47,107.44	\$	72,239.24	\$	125,210.90
August		\$ (78.50	)\$	(1,078.81)	) \$	2,660.07	\$	180.90		\$ 2,913.70	2,550.77	\$ 4,252.39	49,260.62	\$ 46,521.73	49,260.62	\$	75,541.13	\$	130,912.62
September		\$ (78.50	)\$	(867.26)	) \$	2,138.45	\$	180.90		\$ 2,913.70	1,826.15	\$ 3,044.37	39,600.94	\$ 37,399.12	39,600.94	\$	60,728.04	\$	105,458.82
October		\$ (78.50	)\$	(803.64)	) \$	1,981.57	\$	180.90		\$ 2,913.70	1,809.42	\$ 3,016.48	36,695.68	\$ 34,655.40	36,695.68	\$	56,272.83	\$	98,138.74
November		\$ (78.50	)\$	(885.52)	) \$	2,183.49	\$	180.90		\$ 2,913.70	2,248.44	\$ 3,748.37	40,434.93	\$ 38,186.75	40,434.93	\$	62,006.97	\$	108,256.15
December		\$ (78.50	)\$	(906.62)	) \$	2,235.50	\$	180.90		\$ 2,913.70	2,320.95	\$ 3,869.26	41,398.16	\$ 39,096.42	41,398.16	\$	63,484.08	\$	110,794.74
					\$									<b>\$</b> -	0	\$			
		\$ (942.00	) \$	(10,949.10)	S S	13,742.88	\$	1,085.40	-	\$ 34,964.40	25,843.26	\$43,083.29	499,958.54	\$472,160.84	499,958.54	\$	766,686.39	\$	1,319,832.10

Summary o	of H	ydro One Bi	lls for 2022	2 - C	Current			GL	4750	000-00-000		From last year	ar, actuals no	ot recei	ived yet							
Actual other than	Dece	ember 2022						GL	4750	00-00-001												
		HYDRO ONE BILL																				
ncrease over last y	/ear	0.0%	-100.0%		0.0%		0.0%			5.2%		1.3%			-100.0%		-100.	0%		5.7%	Increase of	ver 2021
		Earning Shared	Earning Shared	Defer	erred	Deferred			Month	ly Service		LVDS - Low		Volum	netric Rate					Common ST Lines	Total LV	
		Mechanism Vol Rider	Mechanism Vol Rider	Tax A	Asset Vol Rider	Tax Asset Fixe	ed Rider		Char	ge				Rider	#29A							
an	Qtv	0	0		1		5			5		1										
Jan	Rate	\$ (15.70)	0	1	0.054		36.18			612.97		1.6888		Ś	-		\$ -			1.6208	Actual Hy	lro One rate
July-	Qty																					
July-	Rate																					
January				s	2,343.44	\$	180.90		s	3,064.85	2,441.11	\$ 4,122.55	43,397.03	\$	-	43,397.03	s -	43,3	7.03	\$ 70,337.91	\$	80,049.6
ebruary				S	2,283.23	S ·	180.90		S	3,064.85	2,396.08	\$ 4,046.50	42,282.10	\$	-	42,282.10	s -	42,28	2.10	\$ 68,530.83	\$	78,106.3
March				s	2,116.64	S ·	180.90		S	3,064.85	2,225.86	\$ 3,759.03	39,197.06	\$	-	39,197.06	s -	39,19	7.06	\$ 63,530.59	\$	72,652.0
April				S	1,934.96	S ·	180.90		S	3,064.85	1,991.97	\$ 3,364.04	35,832.68	\$	-	35,832.68	s -	35,83	2.68	\$ 58,077.61	\$	66,622.3
May				S	2,532.96	S ·	180.90		S	3,064.85	2,181.71	\$ 3,684.47	46,906.62	\$	-	46,906.62	s -	46,90	6.62	\$ 76,026.25	\$	85,489.4
June				S	2,645.26	S ·	180.90		S	3,064.85	2,395.15	\$ 4,044.93	48,986.29	\$	-	48,986.29	S -	48,98	6.29	\$ 79,396.98	\$	89,332.9
July				S	2,610.63	S ·	180.90		S	3,064.85	2,504.27	\$ 4,229.21	48,345.01	\$	-	48,345.01	S -	48,34	5.01	\$ 78,357.57	\$	88,443.1
August				S	2,557.48	S ·	180.90		S	3,064.85	2,648.64	\$ 4,473.02	47,360.70	\$	-	47,360.70	s -	47,36	0.70	\$ 76,762.19	\$	87,038.4
September				S	2,257.76	\$	180.90		S	3,064.85	2,035.61	\$ 3,437.74	41,810.30	\$	-	41,810.30	\$ -	41,8	0.30	\$ 67,766.13	\$	76,707.3
October				S	1,939.22	\$	180.90		S	3,064.85	1,818.40	\$ 3,070.91	35,911.51	\$	-	35,911.51	s -	35,9	1.51	\$ 58,205.38	\$	66,461.2
Vovember				S	2,190.44	S ·	180.90		S	3,064.85	2,378.90	\$ 4,017.49	40,563.67	\$	-	40,563.67	s -	40,56	3.67	\$ 65,745.60	\$	75,199.2
December				S	2,235.50	S	180.90		S	3,064.85	2,320.95	\$ 3,919.62	41,398.16	\$	-	41,398.16	s -	41,39	8.16	\$ 67,098.14	\$	76,499.0
				S										\$	-		s -		0	\$-		
		-	-	S	27,647.52	\$ 2,	170.80	-	S	36,778.20	27,338.65	\$46,169.51	511,991.13	\$	-	511,991.13	S -	511,99	1.13	\$ 829,835.18	\$	942,601.2

a		-						~	170														
Demand is san	ie as 20							GL	4/5	00-00-001		2023 Hydro C	ne rates EB-	-202	21-0110								
		HYDRO ONE BILL			0.00%		0.00%			34.47%		14.26%									4.73%	Increase 2	023 over 2022
				effectiv	re to June 30.	effective to J	une 30, 2	023						effe	fective to Dec 31, 2025		effec	tive to Dec	31, 2025				
		Earning Shared	Earning Shared	Deferre	d	Deferred			Month	hlv Service		LVDS - Low		Rat	te Rider Disposition		Rate	Rider Disoo	sition	Common S	T Lines	Total LV	
		Mechanism Vol Rider	Mechanism Vol Rider	Tax As	set Vol Rider	Tax Asset Fit	ked Rider		Char	ge				DV	A Group 1		DVA	Group 2					
lan	Qty	0	0	)	1		5			5		1											
an	Rate	\$ (15.70)	S -	s	0.054	S	36.18		\$	824.28		\$ 1.9296		\$	(0.1340)		\$	(0.0072)		S 1	.5442	From Hydro	o One tariff
uly-	Qty																					sub transm	rission
July-	Rate																					EB-2021-0	110
January				s	2,343.44	s	180.90		s	4,121.40	2,441.11	\$ 4,710.37	43,397.03	S	(5,815.20)	43,397.03	\$	(312.46)	43,397.03	<b>\$</b> 67,0	13.69	\$	72,242.14
ebruary				S	2,283.23	S	180.90		\$	4,121.40	2,396.08	\$ 4,623.48	42,282.10	S	(5,665.80)	42,282.10	\$	(304.43)	42,282.10	<b>\$</b> 65,2	92.02	\$	70,530.80
/larch				s	2,116.64	S	180.90		S	4,121.40	2,225.86	\$ 4,295.02	39,197.06	S	(5,252.41)	39,197.06	\$	(282.22)	39,197.06	S 60,8	28.10	\$	65,707.43
April				s	1,934.96	s	180.90		\$	4,121.40	1,991.97	\$ 3,843.71	35,832.68	S	(4,801.58)	35,832.68	\$	(258.00)	35,832.68	<b>\$</b> 55,3	32.82	\$	60,354.21
Лау				S	2,532.96	S	180.90		\$	4,121.40	2,181.71	\$ 4,209.83	46,906.62	S	(6,285.49)	46,906.62	\$	(337.73)	46,906.62	\$ 72,4	33.20	\$	76,855.07
une				S	2,645.26	\$	180.90		\$	4,121.40	2,395.15	\$ 4,621.68	48,986.29	S	(6,564.16)	48,986.29	\$	(352.70)	48,986.29	<b>\$</b> 75,6	44.63	\$	80,297.01
uly									s	4,121.40	2,504.27	\$ 4,832.24	48,345.01	S	(6,478.23)	48,345.01	\$	(348.08)	48,345.01	S 74,6	54.34	\$	76,781.67
August									\$	4,121.40	2,648.64	\$ 5,110.82	47,360.70	S	(6,346.33)	47,360.70	\$	(341.00)	47,360.70	\$ 73,1	34.36	\$	75,679.25
September									\$	4,121.40	2,035.61	\$ 3,927.91	41,810.30	S	(5,602.58)	41,810.30	\$	(301.03)	41,810.30	\$ 64,5	63.47	\$	66,709.17
October									\$	4,121.40	1,818.40	\$ 3,508.78	35,911.51	S	(4,812.14)	35,911.51	\$	(258.56)	35,911.51	<b>\$</b> 55,4	54.55	\$	58,014.03
lovember									s	4,121.40	2,378.90	\$ 4,590.33	40,563.67	S	(5,435.53)	40,563.67	\$	(292.06)	40,563.67	\$ 62,6	38.42	\$	65,622.56
)ecember									\$	4,121.40	2,320.95	\$ 4,478.51	41,398.16	S	(5,547.35)	41,398.16	\$	(298.07)	41,398.16	\$ 63,9	27.04	\$	66,681.53
				S	-									S	-	0	\$	-	0	S	-		
			-	S	13,856.50	S 1	,085.40	-	\$	49,456.80	27,338.65	\$52,752.68	511,991.13	I S	(68,606.80)	511,991.13	\$ (	3,686.34)	511,991.13	\$ 790,6	16.64	S	835,474.88

After the forecasted LV costs had been determined, this total value was input into the RTSR model in the Host Charges section. The Host volumes that had been included in the original IRM submission were deleted, as they were not used or relevant in this model for any calculation purposes.

Low Voltage Charges								
Host I:	2017	2018	2019	2020	2021	2022 Forecast	2023 Forecast	Forecast Methodology
Host Volume	2017	2010	2010	LOLO	LOLI	LULL I OI COUST	LULUTOTOTOTO	Used 2022 kW,
Host Charges	775,365	668,075	912,091	1,249,117	1,319,832	942,601	835,475	and Hydro One's approved 2023 rates
Host II:								
Host Volume Host Charges	2017	2018	2019	2020	2021	2022 Forecast	2023 Forecast	Forecast Methodology

The 2023 Forecasted Volume values were entered, which were the same amounts as those used in the RTSR Workform rate calculations. These are 2021 RRR values, non-loss adjusted. The RTSR connection rate is then multiplied by the volumes (loss adjusted for kWh, non-loss adjusted for kW) to provide the RTSR Connection Revenue and an allocation percentage by class. This allocation percentage is multiplied by the total forecasted Low Voltage amount to obtain the Allocated Low Voltage Charge by Class. The Allocated Low Voltage Charge by Class is then divided by the Delivered Volume, which is non-loss adjusted kWh and kW Volumes. This provides the Low Voltage Rates by Class.

Low Voltage Rates												
Proposed Loss Factor	1.0481	1										
Instructions: Please enter the rate class volumes consistent with the proposed load forecast, and proposed loss factor. If Low Voltage charges are applied based on volumes uplifted for losses, please select Loss Adjusted Volume in cell J34												
Rate Class	Unit	2023 Forecasted Volume	RT SR Connection Rate	Loss Adjusted Volume	RTSR Connection Revenue	Allocation	Allocated Low Voltage Charges	Delivered Volume	Low Voltage Rates			
RESIDENTIAL SERVICE CLASSIFICATION	\$/kWh	95,077,763	0.006033406	99,651,004	601,235	40.9%	341,320	95,077,763	0.0036			
GENERAL SERVICE LESS THAN 50 KW SERVICE CLASSIFICATION	\$/kWh	33,527,318	0.005540883	35,139,982	194,707	13.2%	110,535	33,527,318	0.0033			
GENERAL SERVICE 50 to 4,999 kW SERVICE CLASSIFICATION	\$/kW	298,325	2.242087491	298,325	668,871	45.4%	379,717	298,325	1.2728			
SENTINEL LIGHTING SERVICE CLASSIFICATION	\$/kW	282	1.770099459	282	499	0.0%	283	282	1.0049			
STREET LIGHTING SERVICE CLASSIFICATION	\$/kW	2,420	1.733315161	2,420	4,195	0.3%	2,382	2,420	0.9840			
UNMETERED SCATTERED LOAD SERVICE CLASSIFICATION	\$/kWh	375,339	0.005540893	393,393	2,180	0.1%	1,237	375,339	0.0033			
				_		0						
TOTAL				-	1,471,686	100.0%	835,475					

b) Please confirm Orangeville Hydro used the same methodology approved in EB-2013-0160 to adjust the low voltage rate. If not, please explain the differences.

#### Response:

Orangeville Hydro used an overall similar methodology approved in EB-2013-0160 to adjust the LV rate. The methodology used by Orangeville Hydro in EB-2013-0160 is as follows: The actual LV rates from the 2014 Hydro One IRM were obtained from EB-2013-0141. These rates were applied to 2013 actual kW to obtain a total LV forecasted expenses.

Table 8.10 Hydro One Test Year Forecast													
Hydro One LV Charges	2014 ST Rates		Billing Determinent	Months	\$								
Service Charge	298.89		48		14,347								
Common ST Lines	0.6820		493,338	12	336,457								
LVDS	1.9870		19,465		38,677								
					389,481								

The basis for allocation calculated the dollars by class using the Retail Transmission Connection Rate multiplied by the forecasted Annual kWh and kW by class. This was then used to calculate the allocation percentages by Class, and then the Allocated dollars by Class.

Orangeville Hydro Limited ~ EB-2013-0160													
Low Voltage Costs Allocated by Customer Class													
Customer Class Retail Transmission Connection Rate (\$) Basis for Allocation Percentages Allocated S													
	per KWh	per kW											
Residential	0.0034		307,571	38.81%	151,143								
GS < 50 kW	0.0031		117,042	14.77%	57,516								
GS >50 to 4999 kW		1.2309	361,546	45.62%	177,667								
GS >1000 to 4999 kW			0	0.00%	0								
Large Use			0	0.00%	0								
Sentinel Lights		0.9716	329	0.04%	162								
Street Lighting		0.9514	4,976	0.63%	2,445								
Unmetered and Scattered	0.0031		1,113	0.14%	547								
TOTALS			792,577	100.00%	389,481								

The LV rates were then determined using the same forecasted kWh and kW as above, and dividing the LV allocated dollars by the forecasted kWh and kW.

	Orangeville Hydro Limited ~ EB-2013-0160												
RATES - Low Voltage Adjustment													
Customer Class LV Adj. Calculated kWh Calculated kWh Calculated kWh Volumetric LV Adj. LV Adj. LV Adj.													
Residential	151,143	90,278,404		kWh	0.0017								
GS < 50 kW	57,516	37,678,912		kWh	0.0015								
GS >50 to 4999 kW	177,667	121,733,913	293,725	kW		0.6049							
Sentinel Lights	162	122,536	339	kW		0.4774							
Street Lighting	2,445	1,861,618	5,230	kW		0.4675							
Unmetered and Scattered	547	358,304		kWh	0.0015								
TOTALS	389,481	252,033,687	299,294										

c) Please confirm that energy based billing determinants are adjusted for losses but the demand based billing determinants are not adjusted for losses.

#### Response:

Orangeville Hydro adjusted the RTSR model from the original submission on October 12, 2022 to change the billing determinants to delivered volumes, which are not loss adjusted for both energy based and demand based billing determinants.

d) Please explain why this adjustment is required in 2023 and cannot wait until Orangeville Hydro's next Cost of Service application.

#### Response:

Orangeville Hydro has seen a significant increase in the difference between LV Costs and LV revenues since its last Cost of Service application in 2014. The LV charge relates to the cost of a Host Distributor to distribute electricity to an Embedded Distributor. The variance between LV charges paid to Host Distributors and the LVSR billed to customers are captured in 1550 LV Variance Account. LVSRs are set as part of rebasing rate applications. Other charges paid to the Host Distributor, such as RSVA Transmission Network and RSVA Transmission Connection have much smaller balances as the OEB IRM Rate Generator Model updates the RTSR's mechanistically as part of an IRM. The table below shows Orangeville Hydro's Host Distributor Total Claim balances for disposal as of December 31, 2021 from the OEB Rate Generator Model, tab 3 Continuity Schedule.

Group 1 Account related to Host Distributor	H r⁄ Disp	Host Amount equested for position in 2023 IRM	As a % of Total
USoA 1550 LV Variance Account	\$	948,279	90%
USoA 1584 RSVA - Retail Transmission Network Charge	\$	72,678	7%
USoA 1584 RSVA - Retail Transmission Transmission Charge	\$	29,782	3%
	\$	1,050,739	100%

The accumulation of variance account balances may further cause intergenerational inequity when variance account balances are recovered/returned in future periods. Based on the rate making principle of cost causality, costs should be borne by the customers that cause those costs. Delaying the recovery of the LV Variance Account can potentially create misalignment with cost causality. Although LV is a Group 1 account and is typically disposed of on an annual basis, the size of the variance has become significantly higher than other variance accounts. This also becomes more difficult to manage for cash flow purposes, with the Account 1550 disposition amount in Orangeville Hydro's 2022 IRM application being \$881,642, which was 88% of the total Group 1 account claim of \$1,001,144.

There are precedents where the OEB has allowed the resetting of the LVSR as part of an IRM. In EB-2021-0042, as part of Milton Hydro Distribution Inc.'s IRM application, the OEB approved a request to reset LVSRs as part of the proceedings.

e) Please provide the current balance in account 1550 LV Variance.

## Response:

The balance at October 31, 2022 in account 1550 LV Variance, including interest of \$24,481.46, is \$1,444,959.64.

f) Please explain why this request is in the best interest of customers.

## Response:

Orangeville Hydro believes it is in the best interest of its customers to adjust the LVSR rate for the 2023 rates as opposed to waiting until its next cost of service rate application for the following reasons:

- To mitigate the potential rate increases associated with its next rebasing.
- By adjusting the LV rate prior to the next cost of service application, it also prevents a larger balance from accumulating in the variance account.
- To ensure rate stability for customers. If Orangeville Hydro is able to better match costs to revenues, this will ensure better accounting practices, which will lead to smaller variance balances to be disposed of in a future period.
- To mitigate intergenerational inequities to the best of our ability.
- g) Please confirm Orangeville Hydro is only seeking to reset the LVSR for the 2023 rate year and not for future IRM years.

### Response:

Orangeville Hydro is presently seeking the OEB's approval to reset the LVSR for the 2023 rate year and not for future IRM years at this time.

### VECC-2

Ref: Application p. 16

Orangeville Hydro expects that the Low Voltage rates can be adjusted based on the OEBapproved host-Low Voltage rates when determined.

Please provide the timing of this adjustment and the impact on the proposed Low Voltage rates in 2023.

# Response:

The Decision and Order for Hydro One Cost of Service rate application EB-2021-0110 was approved by the OEB on November 29, 2022. Based on the same demand values for 2022 and 2023, the LV total costs decreased by 11.4% in 2023 over 2022 costs.

## VECC-3

Ref: Application p. 16-17

Please provide a table that sets out the following for the years 2014 to 2023:

- Low Voltage Payments to Host Distributors
- Low Voltage Revenues
- Variance of Costs compared to Revenues

#### Response:

Please see below a table summarizing this requested information, using 2023 Low Voltage Payments to Host Distributor (EB-2021-0110) and updated 2023 forecasted LV revenue rates. The variance of \$141,395 in 2023 takes into account Orangeville Hydro's rate year of May 1<sup>st</sup>, 2023.

Year	Low Voltage Payments to Hydro One	Low Voltage Revenues from Customers	Variance of Costs compared to Revenues
2014	\$ 534,011	\$ 333,412	\$ 200,600
2015	\$ 675,954	\$ 378,662	\$ 297,291
2016	\$ 799,803	\$ 387,932	\$ 411,871
2017	\$ 775,365	\$ 379,177	\$ 396,188
2018	\$ 668,075	\$ 394,845	\$ 273,230
2019	\$ 912,091	\$ 386,690	\$ 525,401
2020	\$ 1,249,117	\$ 386,835	\$ 862,283
2021	\$ 1,319,832	\$ 394,193	\$ 925,639
2022	\$ 942,601	\$ 405,263	\$ 537,338
2023	\$ 835,475	\$ 694,080	\$ 141,395
	\$ 8,712,324	\$ 4,141,089	\$ 4,571,235



#### VECC-4

Ref: Application p. 16-17

Please quantify the anticipated incremental impact/variance on the total balances

in account 1550 LV Variance Account (as of December 31, 2023) based on a) status quo of LVSRs and b) Orangeville Hydro's proposed updated LVSRs.

#### Response:

Please see below a table summarizing this requested information. Based on status quo of LVSRs, Orangeville Hydro's LV Total 1550 Account Balance would be \$995,174. Based on Orangeville Hydro's proposed updated LVSRs, the LV Total 1550 Account Balance would be \$700,083. As per the response in VECC-1 (f), if Orangeville Hydro is able to better match costs to revenues, this will ensure better accounting practices, which will lead to smaller variance balances to be disposed of in a future period.

VECC Q4: Variance account balance with status quo LV rates													
Year	Low Voltage Payments to Hydro One	Low Voltage Revenues from Customers	Variance of Costs compared to Revenues	Total 1550 Account Balance									
2020	\$ 1,249,117	\$ 386,835	\$ 862,283										
2021	\$ 1,319,832	\$ 394,193	\$ 925,639	\$ 1,809,271									
2022	\$ 942,601	\$ 405,263	\$ 537,338	\$ 1,484,327									
2023	\$ 835,475	\$ 398,989	\$ 436,486	\$ 995,174									
	\$ 4,347,026	\$ 1,585,280	\$ 2,761,746										
	VECC Q4: Var	iance account balanc	e with new LV rates										
Year	Low Voltage Payments to Hydro One	Low Voltage Revenues from Customers	Variance of Costs compared to Revenues	Total 1550 Account Balance									
2020	\$ 1,249,117	\$ 386,835	\$ 862,283										
2021	\$ 1,319,832	\$ 394,193	\$ 925,639	\$ 1,809,271									
2022	\$ 942,601	\$ 405,263	\$ 537,338	\$ 1,484,327									
2023	\$ 835,475	\$ 694,080	\$ 141,395	\$ 700,083									
	\$ 4,347,026	\$ 1,880,371	\$ 2,466,655										

#### VECC-5

Ref: EB-2021-0042 Milton Hydro Distribution Inc. IRM Application & Decision

 a) Please discuss how Orangeville Hydro's methodology to calculate the adjustment to Low Voltage Service Rates in 2023 differs from the Low Voltage adjustment methodology/calculation approved in Milton Hydro's application for 2022 rates.

#### Response:

Orangeville Hydro used a slightly different methodology than Milton Hydro used to calculate the LV rate adjustment. Milton Hydro used the previous year's actual LV costs paid to its Host Distributor as the numerator dollar amount and allocated this amount to customer classes on the same basis as the Transmission Connection Charges, and then applied the previous year's Transmission Connection denominator volumes to calculate the LVSRs. The difference between Milton Hydro and Orangeville Hydro's methodology is that Orangeville Hydro was able to use approved 2023 Hydro One rates due to our May 1st rate change. Orangeville Hydro's forecasted

LV costs were based on the historical 2022 demand values multiplied by the 2023 approved Hydro One LV rates in EB-2021-0110. Hydro One's Decision and Order EB-2021-0110 was not available to Milton Hydro as it had aligned its rate change to January 1st.

b) If different, please explain the advantages of Orangeville Hydro's proposed methodology.

## Response:

## <u>Advantages</u>

- Allows for a more accurate forecast of costs, by using actual rates for the forecasted year, based on OEB-approved rates.
- Would enable smaller variances in Account 1550 LV variance account.
- The approved OEB RTSR model (used for Transmission Network and Transmission Connection in the course of a COS) was used to complete the final LV rate calculation.
- Would allow for less volatility in rates due to timing of rate changes, enabling small rate impacts.
- LV rates typically have a larger number of rates involved in the total LV costs, including rate riders. Using actual 2023 rates allows for inclusion or removal of all applicable rates, which could increase or decrease the forecasted rates significantly, creating more precise forecasted costs.

### **Disadvantages**

- A separate spreadsheet had to be completed to calculate the correct forecasted LV costs, prior to inputting this value into the OEB RTSR model for final LV rate calculation.
- LV rates typically have a larger number of rates involved in the total LV costs, including rate riders. There is the potential for missing an applicable rate in the forecasted rate calculation.

### VECC-6

# Ref: Application p.16

Orangeville Hydro is applying for an adjustment of its Low Voltage (LV) rates billed to customers based on a comparison of historical LV costs adjusted for expected increases to the Low Voltage rates.

Please provide this comparison.

# Response:

Orangeville Hydro compared historical LV Variances to determine that there was a need for an LV rate increase to better match revenues with costs. Please see the table provided in Question VECC-3. It shows the increase in LV costs year over year, which have increased 56% from 2014 to 2023 with no corresponding increase to revenues from customers. This table shows the

reduction in LV Account Balance with the forecasted 2023 rate increase based on Hydro One's approved 2023 LV rates.