**2023 IRM Application**

Interrogatory Responses

EB-2022-0031

Table of Contents

Table of Contents 2

Staff Question #1 3

Response 4

Staff Question #2 4

Response 5

Staff Question #1

**Ref 1: IRM Rate Generator Model, Tab 3**

**Ref 2: 2022 IRM Rate Generator Model, Tab 3 (EB-2021-0023)**

**Ref 3: 2023 GA Analysis Workform, Tab 2, cell C90**

**Preamble:** OEB staff has compiled the following table showing the differences in the data points from the continuity schedule of the 2023 IRM rate generator model, the same data points from the continuity schedule of the 2022 IRM rate generator model and the amounts in the 2023 GA Analysis Workform.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Transaction Account during 2019 | Per the Tab 3. Continuity Schedule of the IRM Rate Generator Model in this application (A) | Per the Tab 3. Continuity Schedule of the 2022 IRM Rate Generator Model(B)  | Per the Tab ‘GA 2019’ of the GA Analysis Workform(C) | Differences |
| Account 1588 RSVA Power | Credit of $329,199 (cell AJ28) | Credit of $105,145 (cell AT28) | n/a | Difference of $224,054 between A and B. |
| Account 1589 RSVA Global Adjustment | Debit of $2,547,110 (cell AJ29) | Debit of $2,297,248 (cell AT29) | Debit of $2,297,248 (cell C90) | Difference of $249,862 between A and B and between A and C. |

**Questions**

1. Please confirm that the data in the table above is correctly compiled by OEB staff. If not, please revise the table, as applicable.
2. Please explain the differences noted in the table and update the evidence, as applicable, to reconcile the amounts.

Response

1. Essex Powerlines confirms that the data in the table was correctly compiled by the OEB.
2. After further review of the differences noted in the table, Essex Powerlines has updated the continuity schedule in the 2023 rate generator model to correct the noted variances. There are now no differences between the 2023 rate generator model, the 2022 rate generator model and the 2019 GA Analysis Workform. The total claim requested by Essex Powerlines has not changed.

Further to Staff Question #5b) in the set of interrogatories received on December 16, 2022, Essex Powerlines has adjusted the disposition period from the original 8-month request to the default 12-month period, as approval has since been granted for deferral of our cost of service.

Staff Question #2

**Ref 1: Manager Summary, Appendix C**

**Ref 2: The OEB’s letter to Essex Powerlines, March 9, 2022**

**Preamble:** In Ref 1, Essex Powerlines states the following two actions that are to be completed in 2023.

* Future Action Items for Section 1 Finding #3 – ‘KPMG engaged to review by April 2023 COS rate application’.
* Future Action Items for Section 2 Finding #1 – ‘KPMG engaged to review 1588 and 1589 accounts balances as directed by OEB Review to be completed by April 2023 COS rate application filing’.

In Ref 2, the OEB approved Essex Powerlines’ request of deferring the cost of service application for eight months for the rates effective January 1, 2024.

**Questions**

1. Please provide the status of the above two action items in the management action plan.
2. Given that the OEB has approved Essex Powerlines’ deferral request of its cost of service application from 2023 to 2024, please explain if this has impacted the timelines of the above two action items. If so, please explain why.
3. Please confirm that the above two action items are to be completed by the time of filing the 2024 rebasing application and that Essex Powerlines will file the evidence supporting the completion of the action plans.

Response

1. The review of key regulatory Standard Operating Procedures and the review of account balances 1588 and 1589 per the sections noted above of the Management Action Plan are in progress.
2. Timelines of the above action items have not been impacted by the OEB approval of Essex Powerlines’ deferral of its cost of service application. Work continues on the reviews by KPMG.
3. Essex Powerlines confirms that the two action items will be completed as part of its 2024 IRM application. Essex Powerlines will file the evidence supporting the completion of the action plans at that time.