

February 27, 2023

VIA EMAIL & RESS

Ms. Nancy Marconi
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street, 26th Floor
PO Box 2319
Toronto, ON M4P 1E4

**Re: Board File No. EB-2022-0034 – 2023 Incentive Regulation Mechanism Application
Greater Sudbury Hydro Inc. – Licence No. ED-2002-0559**

Dear Ms. Marconi,

GSHI confirms it has reviewed the decision and accompanying draft Rate Order for accuracy and completeness. GSHI has noted the following and is requesting Board Staff review to determine if changes are necessary.

1) Page 4 Annual Adjustment Mechanism – second paragraph

The paragraph currently reads: *“The components of the Price Cap adjustment formula applicable to Greater Sudbury Hydro are set out in the table below. Inserting these components into the formula results in a **3.70%** increase to Greater Sudbury Hydro’s rates: $3.40\% = 3.70\% - (0.00\% + 0.30\%)$.”* GSHI believes the bolded 3.70% should be 3.40%.

2) Page 5 Annual Adjustment Mechanism – second line

The line currently reads: *“factor assigned to any distributor is based on the distributor’s total cost performance as benchmarked against other distributors in Ontario. The stretch factor assigned to **LDC** is 0.30%, resulting in a rate adjustment of 3.40%.”* GSHI believes the bolded “LDC” should be Greater Sudbury Hydro.

3) Page 10 Lost Revenue Adjustment Mechanism Variance Account – fifth paragraph

The paragraph currently reads: *“Greater Sudbury Hydro has applied to dispose of its LRAMVA credit balance of \$71,692. The balance consists of lost revenues from 2021 to 2022 from CDM programs delivered during the period from 2019 to 2020 and carrying charges. During the proceeding, **LDC** updated its LRAMVA balance to incorporate the updated OEB approved prescribed interest rates. This update results in a decrease of \$199 and a*



revised LRAMVA credit balance of \$71,891.” GSHI believes that the bolded “LDC” should be Greater Sudbury Hydro. GSHI also suggests the following wording change to provide further clarity, should Board staff agree: “This update results in an increase of \$199 of carrying charges owed to customers and a revised LRAMVA credit balance of \$71,891.”

A copy of this letter has been provided to GSHI’s case manager.

Yours Truly,

Original signed by

Tiiija Luttrell, CPA, CA
Supervisor – Regulatory

Cc: Arturo Lau