



Quinte Manufacturers Association

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario M4P 1E4
Via Email registrar@oeb.ca

August 18, 2023

Dear Ms. Marconi:

Re: EB-2023-0143 Request for an Accounting Order to establish Generic Locates Services Variance Accounts beginning January 1, 2023

Pursuant to Procedural Order No. 1 in the above-noted proceeding, the Quinte Manufacturers Association ("QMA" or "Association") offers the following comments concerning the establishment of a sector-wide variance account to capture the additional costs to utilities for locates and related services as a consequence of the enactment of the Province of Ontario's new *Getting Ontario Connected Act, 2022* ("the Act").

The QMA has reviewed the evidence and draft accounting orders filed by the large electric utilities and Enbridge Gas Inc. in this proceeding. The Association recognizes and understands the importance of timely and accurate utility locates particularly within the property boundaries of active manufacturing and processing facilities. Safety and cost causality, are top concerns for QMA members who are connected to the distribution facilities of Hydro One Networks Inc., Elexicon Energy Inc., and Enbridge Gas Inc. The evidence of these utilities explains the expected incremental cost impact to each as a result of the new requirements of the Act. The QMA expects the incremental locates costs to be only those recorded since January 1, 2023 that are not included in currently approved rates for the respective utilities.

Since the Ontario Energy Board is only considering the possible establishment of the locates variance accounts to track incremental costs at this time, the QMA supports this initiative for tracking and potential disposition purposes and that such accounts be retroactive to January 1, 2023, when the utilities began incurring the incremental costs for locates.

The QMA appreciates the opportunity to provide these brief comments to the Board.

Respectfully,

Michael McLeod
Quinte Manufacturers Association

Cc: Ms. C. Davis, Chair, QMA Steering Committee
All Parties to EB-2023-0143