



October 18, 2023

Nancy Marconi
Registrar
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
Toronto ON
M4P 1E4

Dear Ms. Marconi,

**RE: EB-2023-0004 Alectra Utilities Corporation Incremental Capital Module
Application for 2024 Distribution Rates and Charges - CCMBC Argument**

Attached is the argument submission of the Coalition of Concerned Manufacturers and Businesses of Canada (CCMBC) in the EB-2023-0004 Alectra Utilities Corporation Incremental Capital Module proceeding for 2024 Distribution Rates and Charges.

CCMBC believes that it has participated efficiently and responsibly in this proceeding and requests that it be allowed to recover all of its reasonably incurred costs.

Respectfully submitted on behalf of CCMBC,

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Oluwole (Wolly) Bibiresanmi (OEB Staff)
Lawren Murray (OEB Staff)
Catherine Swift (CCMBC)
Natalie Yeates (Alectra Utilities)

EB-2023-0004
Alectra Utilities Corporation
Application for Incremental Capital Module funding effective January 1, 2024

Coalition of Concerned Manufacturers and Businesses of Canada

Argument Submission

October 18, 2023

Executive Summary

Alectra Utilities filed an application with the Ontario Energy Board on May 21, 2023, seeking approval for a rate rider for Incremental Capital Module (ICM) funding from ratepayers for underground cable renewal capital expenditures in the Enersource and PowerStream Rate Zones for 2024. The expenditures are for a program consisting of sixteen projects with a total cost of \$25.1 million. Eleven of the projects costing \$17.3 million are in the PowerStream Rate Zone (RZ) and five, costing \$7.9 million, are in the Enersource RZ.

CCMBC is not opposed to Alectra renewing its underground cables. It is only opposed to its members being charged higher rates to pay for the renewal when Alectra does not need the money.

CCMBC submits that the OEB should not approve ICM funding from ratepayers for these capital expenditures because Alectra has not proven need. The evidence shows that Alectra does not need the additional money from ratepayers because its 2024 total capital expenditure programs for the Enersource and PowerStream RZs are below the materiality thresholds for each rate zone according to the OEB rules for ICM applications. Alectra claims to need the funding based on its change to the OEB policy for the calculation of materiality thresholds. CCMBC submits that the policy change proposed by Alectra is wrong because it is based on a misunderstanding of the OEB's Price Cap Incentive Regulation rate setting methodology. Moreover, there should be no change of the OEB's ICM policy just to accommodate Alectra. If there is to be any change to the ICM policy, it should be through a comprehensive review of capital models that would apply to all distributors that was discussed at the recent 2023 OEB Policy Day.

Alectra has also not demonstrated that all of the 2024 projects that it is funding on its own are of greater priority and must proceed while the projects for which it is seeking ICM funding are conditional on OEB funding approval.

Regulatory Background

In its previous application for ICM funding¹, Alectra applied for approval of riders for ICM funding from ratepayers for underground cable renewal capital expenditures in the Enersource RZ and the PowerStream RZ for 2023 and 2024. The expenditures were for a program consisting of 28 projects over two years with a total cost of \$52.3 million with \$25.4 million in 2023 and \$26.9 million in 2024. In its decision, the OEB approved funding for 2023 only. The current application is for the 2024 projects that were not approved in the last application. The difference between the \$25.1 cost estimate in this application and the \$26.9 million cost estimate for 2024 projects in the last application is due to re-estimates of project costs and transfer of some projects from 2023 to 2024.²

In its decision, the OEB found that the 2023 ICM request and the 2024 ACM request each have a significant influence on operations and on the reliability of distribution service in the PowerStream and Enersource RZs³. The OEB established a normal level of expenditures for cable renewal by reference to the pattern of annual expenditures in each of the PowerStream and Enersource RZs for cable replacement and cable injection work in a six-year period (2017-2022) prior to the ICM request.⁴

In the Enersource RZ, Alectra Utilities funded an average of \$14.6 million for its cable program through existing distribution base rates from 2017 to 2022 and is expected to do so in 2023. The OEB determined that with \$14.6 million funded through base rates and \$1.9 million in ICM funding, a total of \$16.5 million should be available to fund the total cable program in the Enersource RZ as forecast in 2023.

In the PowerStream RZ, Alectra Utilities funded an average of \$16.3 million for the cable program through base rates from 2017 to 2022 and the base rate funding of \$17.6 million in 2023 is commensurate with the average actual spend. The OEB was satisfied with the level of 2023 base rate funding budgeted for the cable program in the PowerStream RZ.⁵

In its decision the OEB found that there was insufficient evidence that would explain why cable renewal projects were of lower priority than projects funded by base rates.

“The OEB considers reliable electricity service a fundamental, core function and responsibility of an electricity distributor. Preventing power failures from underground cables in poor condition, in urgent need of replacement, should be of a greater priority than its customer experience project. Further, the OEB is not convinced that Alectra

¹ EB-2022-0013

² Exhibit 1, Tab 1, Schedule 4, Page 9

³ EB-2022-0013 Decision, Page 11

⁴ *Ibid.*, Page 14

⁵ *Ibid.*, Page 15

*Utilities provided sufficient evidence to justify its prioritizing of some general plant projects in base rates over its cable replacement program”.*⁶

Request for ICM Funding

Alectra Utilities is requesting approval of ICM funding of a program consisting of sixteen projects with a total cost of \$25.1 million. Eleven of the projects costing \$17.3 million are in the PowerStream RZ and five costing \$7.9 million are in the Enersource RZ.⁷

Project #	Project Name	2024
151329	Cable Replacement – Raymerville Drive Area in Markham (M21)	\$1.6
151361	Cable Injection – Cairns Drive of Markham (M21)	\$1.7
151367	Cable Injection – McNaughton Road Area of Vaughan (V26)	\$1.7
151403	Cable Replacement - Montevideo & Battleford Area in Mississauga (Area 46)	\$1.6
151407	Cable Replacement – Glen Erin & Burnhamthorpe of Mississauga (Area 25)	\$2.4
151431	Cable Injection – Glen Erin Dr & Bell Harbour Dr in Mississauga (Area 39)	\$1.3
151435	Cable Injection – Derry Road & Ninth Line (Area 56)	\$1.5
151456	Cable Injection – Sovereign Court Area in Vaughan (V50)	\$1.3
151459	Cable Injection – Creditstone Road Area in Vaughan (V24)	\$2.2
151517	Cable Injection - 8th Line & Highway 11 Area in Bradford (BR5)	\$1.0
151903	Cable Replacement – South Millway Area in Mississauga (Area 25)	\$1.1
151913	Cable Replacement – Cochrane Drive & Scolberg in Markham (M44)	\$2.1
151935	Cable Replacement - Larkin Ave Area of Markham (M15)	\$1.9
152373	Cable Replacement - St. Joan of Arc Area of Vaughan (V26)	\$1.9
152375	Cable Replacement – Hammond Drive Area in Aurora (A09)	\$1.4
152387	Cable Injection – Bainbridge Ave (V51)	\$0.6
	Total Proposed ICM Investment	\$25.1

CCMBC Submission

Despite OEB comments in its decision on its previous application for ICM funding, Alectra did not provide a priority listing of the projects to support its request for incremental funding from ratepayers that would explain why ICM projects are of lower priority than the projects it decided to fund with money with revenues from base rates.

*“Alectra Utilities would like to clarify that there is no priority score, the term ‘high priority projects’ is in reference to the number of failures, clustering/density, and impact on customer reliability warranting the need for an investment.”*⁸

Even though Alectra provided no priority score it decided to re-prioritize some of the projects that it was funding with base rates.

⁶ *Ibid.*, Page 20

⁷ Exhibit 3, Tab 1, Schedule 4, Page 8

⁸ 1-Staff-3

“Alectra Utilities has re-prioritized investments for 2023 based on the OEB’s decision and reduced the investment in General Plant by \$6.2MM primarily by re-prioritizing and deferring Information Technology investments. The funds were redirected to distribution automation in an effort to reduce the number of customers impacted by an outage and restoration time for those customers impacted by both overhead and underground reliability issues. Alectra Utilities elected to invest in distribution automation instead of in cable renewal as automation has a wider beneficial impact for a higher number of customers and provides grid flexibility to expedite restoration for both overhead and underground systems.”⁹

CCMBC also asked for a priority listing of Enersource RZ and PowerStreamRZ projects and received tables in responses that were not in the order of priority,¹⁰ but instead have an “Alectra Value” assigned to them. This “Alectra Value” is described in an answer to an interrogatory.¹¹

“Alectra Utilities utilizes CopperLeaf to optimize the capital investment portfolio on an annual basis. Through this optimization process, a project value is assigned to each capital project. Therefore, Alectra Utilities has included the project value in the attached excel file.

The Value Framework analyzes and scores each potential investment’s benefits, costs and risk mitigation measures. Project benefits include financial (Capital, OM&A), reliability (customer outages), customer satisfaction, environmental, regulatory and innovation. Project risk mitigation measures include financial risk, reliability (capacity risk), compliance risk, reputation risk as well as environmental risk. Alectra Utilities compares all investments when developing a capital work plan portfolio based on the value the project provides to meet customer and organization needs, risk tolerances and timing requirements.”

CCMBC submits Alectra has not provided evidence to satisfy OEB’s request for sufficient evidence that it has prioritized its 2024 capital projects. It ignored the comments of the OEB Commissioners in the last decision. It is not clear if Alectra’s actions can be attributed to ignorance or insolence, but it is one of the reasons that this application for ICM funding should not be approved.

Eligibility for ICM Funding

In its EB-2018-0016 decision of January 2019, the OEB explained overall eligibility for ICM Funding.¹²

⁹ 1-Staff-9h

¹⁰ CCMBC-4b; CCMBC-7b

¹¹ 1-Staff-3a and b

¹² EB-2018-0016, Decision and Order, Alectra Utilities Corporation, January 31, 2019, Pages 4 and 5

“As set out in the OEB’s ICM policy, the ICM is a funding mechanism available to electricity distributors whose rates are established under the Price Cap IR regime, as described in Section 3.3.2 of the Filing Requirements. The OEB’s ICM policy does not make ICM funding available for typical annual capital programs. It is also not available for projects that do not have a significant influence on the operations of the distributor. The ICM is intended to address the treatment of a distributor’s capital investment needs that arise during the Price Cap IR rate-setting plan which are incremental to a materiality threshold.”

Materiality Threshold

The formula for the calculation of the Materiality Threshold is specified in the 2023 Filing Requirements¹³ and which Alectra refers to in its evidence.¹⁴

$$\text{Threshold Value (\%)} = \left(1 + \left[\left(\frac{RB}{d} \right) \times (g + PCI \times (1 + g)) \right] \right) \times ((1 + g) \times (1 + PCI))^{n-1} + X\%$$

RB = rate base from the distributor’s last cost of service

d = depreciation from the distributor’s last cost of service

g = growth calculated based on the percentage difference in distribution revenues between the most recent complete year and the distribution revenues from the most recent approved test year in a cost-of-service application

PCI = Price Cap Index (IPI-stretch factor) from the distributor’s most recent Price Cap IR application as a placeholder for the initial application filing to be updated when new information becomes available

n = number of years since the last rebasing

X = dead band which has been reduced to 10% in the 2023 Filing Requirements

One of the inputs in the formula is inflation as determined by the Input Price Index or IPI. The current Board approved IPI is 4.8%.¹⁵

In the EB-2020-0002 decision¹⁶ the OEB allowed Alectra Utilities to treat its Rate Zones as separate utilities for the purpose of calculating ICM Materiality Thresholds.

Enersource RZ

The materiality threshold for the Enersource RZ based on the OEB approved IPI of 4.8% is \$67.7 million¹⁷. That is the 2024 capital expenditure level that Alectra should be able to fund with revenues from its 2024 Enersource RZ base rates because these rates were set using the 4.8% IPI. Enersource RZ 2024 Capital Budget is \$56.2 million which is \$11.4 million below the \$67.7 million that can be funded by base rates. Therefore, Alectra does not need any incremental funding from ratepayers for its 2024 capital program for the Enersource RZ.

¹³ OEB Filing Requirements for Electricity Distribution Rate Applications – 2023 Edition for 2024 Rate Applications- Chapter 3, Chapter 3 Incentive Rate-setting Applications, June 15, 2023, Page 29

¹⁴ Exhibit 2, Tab 1, Schedule 1, Page 4

¹⁵ *Ibid.*

¹⁶ EB-2020-0002 Decision, Page 62

¹⁷ 1-Staff-1d

However, Alectra claims in its evidence that instead of OEB approved IPI of 4.8% a geometric mean inflation index of 2.17% should be used to calculate the materiality threshold for Enersource RZ. This would lower the materiality threshold from \$67.7 million to \$40.7 million. Alectra uses this reduced materiality threshold to justify its request for \$7.9 million of additional ICM funding from ratepayers for cable renewal projects in the Enersource RZ.

PowerStream RZ

The materiality threshold for the PowerStream RZ based on the OEB approved IPI of 4.8% is \$130.5 million¹⁸. That is the capital expenditure level that Alectra should be able to fund with revenues from its PowerStream RZ base rates because these rates were set using the 4.8% IPI. PowerStream RZ 2024 Capital Budget is \$117.6 million which is \$12.9 million below the \$130.5 million that can be funded by base rates. Therefore, Alectra does not need any incremental funding from ratepayers for its 2024 capital program for the PowerStream RZ.

Alectra claims in its evidence that instead of OEB approved IPI of 4.8% a geometric mean inflation index of 2.40% should be used to calculate the materiality threshold for the PowerStream RZ. This would lower the materiality threshold from \$130.5 million to \$90.5 million. Alectra uses this reduced materiality threshold to justify its request for \$7.9 million of additional ICM funding from ratepayers for cable renewal projects in the PowerStream RZ.

CCMBC Submission

The EB-2014-0219 Report of the Board explains how to use the materiality threshold.

*“A capital budget will be deemed to be material, and as such reflect eligible projects, if it exceeds the Board-defined materiality threshold.”*¹⁹

Therefore, the key to obtaining approval for ICM funding is for a utility to have a capital in-service forecast for the year for which it is seeking approval that exceeds the materiality threshold. Alectra does not meet that requirement because materiality thresholds for both rate zones are above the capital expenditure forecasts based on the OEB approved IPI of 4.8%. Alectra claims that instead of using the OEB approved IPI, a geometric mean of inflation parameters should instead be used to determine the materiality threshold. This change to the calculation of the materiality threshold was discussed by Board staff in the last proceeding as summarized by the OEB in its decision.

OEB staff took no issue with Alectra Utilities’ materiality threshold calculation. As an aside, OEB staff outlined an alternative approach to the materiality threshold

¹⁸ 1-Staff-1d

¹⁹ EB-2014-0219 Report of the Board, *New Policy Options for the Funding of Capital Investments: The Advanced Capital Module, September 18, 2014, Section 4.1.5, Page 17*

calculation. Currently, the materiality threshold formula uses the most up-to-date inflation value. Given the sharp increase to inflation during the past few years, the current year's inflation does not represent the historical inflation since the last rebasing year for each RZ. According to OEB staff, a materiality threshold calculation that uses a geometric mean of all inflation values from the RZ's last rebasing until the year of the application is a more realistic representation of inflation. Although OEB staff believes the alternative approach to be a more realistic representation of inflation, OEB staff ultimately submitted that given policy, Alectra Utilities correctly applied the materiality threshold calculation. In reply, Alectra Utilities submitted that amendments to ICM policy should be considered through a policy review process rather than as part of this proceeding.²⁰

The OEB will not change the inflationary input to the ICM calculations as outlined by OEB staff. OEB staff's suggestion could be considered as part of a review of the OEB's ICM policy but should not be considered in this proceeding given that it was only raised by OEB staff in its submission and calculations were not provided to the other parties to allow for a thorough consideration of this issue.²¹

CCMBC submits that the proposed change to the inflation input method would be a fundamental change to one of the basic principles underlying the concept of ICM.

“As set out in the OEB's ICM policy, the ICM is a funding mechanism available to electricity distributors whose rates are established under the Price Cap IR regime, as described in Section 3.3.2 of the Filing Requirements.”

The Filing Requirements allow distributors to use one of three rate setting methods. Alectra has selected the Price Cap IR method. The parameters of the Price Cap IR method are shown in Table 1 of the Filing Requirements²² which is reproduced on page 9 of this argument submission. The distributors using the Price Cap IR method must use the Composite Index for inflation as explained in the Filing Requirements

Inflation Factor

In its Report of the Board: Rate Setting Parameters and Benchmarking under the Renewed Regulatory Framework for Ontario's Electricity Distributors the OEB adopted a two-factor industry-specific price index methodology. The inflation factor is based on two weighted price indicators (labour and non-labour) which provide an input price that reflects Ontario's electricity industry.²³

²⁰ EB-2022-0013 Decision, Page 8

²¹ *Ibid.*, Page 9

²² Report of the Board, *Renewed Regulatory Framework for Electricity Distributors: A Performance-Based Approach*. October 18, 2012, Page 13, Table 1

²³ *Ibid.*, Page 6

The OEB explained how the inflation factor is to be calculated and implemented in an earlier Report of the Board²⁴.

The inflation factor will be calculated and reported annually along with the cost of capital parameters to be used in setting distribution rates. The inflation factor will be used to adjust rates for both January 1st and May 1st implementation.

The Distributors using the Price Cap IR method are required to use the OEB's inflation factor that is reported annually as shown in Table 1 on Page 9 of this submission. They are not free to calculate their own inflation factor for rate setting. In the current case the OEB's most recent inflation factor is 4.8% which will be updated by the OEB prior to implementation of new rates on January 1, 2024. It is likely that the final inflation factor will be close to 4.8%. The new rates that customers will have to pay in 2024 will be substantially higher than 2023 rates and the distributors using Price Cap IR like Alectra will collect substantially higher revenues.

As mentioned earlier the EB-2014-0219 Report of the Board explained the concept of the Materiality Threshold.

The materiality threshold is in effect a capital expenditure threshold which serves to demonstrate the level of capital expenditures that a distributor should be able to manage with its current rates.²⁵

The Materiality Threshold is based on the revenues from rates. If rate revenue increases, the Materiality Threshold is designed to also increase. The price cap index and the materiality threshold are intended to move in tandem. If a distributor has greater revenues it can afford to spend more on capital expenditures. It is a fundamental concept underlying the ICM that the same inflation factor must be used for rate setting and for the Materiality Threshold calculation. If inflation increases the Price Cap formula increases rates by $I - X$, that is, by inflation minus productivity. The base rate increase includes a component for depreciation expense, which means that depreciation expense recovered in rates increases by $I - X$ as well. Any increase in the Materiality Threshold is due to the increase in rates to be paid by customers.

²⁴ EB-2010-0379 Report of the Board, *Rate Setting Parameters and Benchmarking under the Renewed Regulatory Framework for Ontario's Electricity Distributors*, issued on November 21, 2013, and as corrected on December 4, 2013, Page 6

²⁵ EB-2014-0219 Report of the OEB, *New Policy Options for the Funding of Capital Investments: The Advanced Capital Module*, September 18, 2014, section 4.1.5, page 17

Table 1: Rate-setting Overview – Elements of the Three Methods

		Price Cap IR	Custom IR	Annual IR Index
Setting of Rates				
“Going in” Rates		Determined in single forward test-year cost of service review	Determined in multi-year application review	No cost of service review, existing rates adjusted by the Annual Adjustment Mechanism
Form		Price Cap Index	Custom Index	Price Cap Index
Coverage		Comprehensive (i.e., Capital and OM&A)		
Annual Adjustment Mechanism	Inflation	Composite Index	Distributor-specific rate trend for the plan term to be determined by the Board, informed by: (1) the distributor’s forecasts (revenue and costs, inflation, productivity); (2) the Board’s inflation and productivity analyses; and (3) benchmarking to assess the reasonableness of the distributor’s forecasts	Composite Index
	Productivity	Peer Group X-factors comprised of: (1) Industry TFP growth potential; and (2) a stretch factor		Based on 4 th Generation IR X-factors
Role of Benchmarking		To assess reasonableness of distributor cost forecasts and to assign stretch factor		n/a
Sharing of Benefits		Productivity factor		
		Stretch factor	Case-by-case	Highest 4 th Generation IR stretch factor
Term		5 years (rebasings plus 4 years).	Minimum term of 5 years.	No fixed term.
Incremental Capital Module		On application	N/A	N/A
Treatment of Unforeseen Events		The Board’s policies in relation to the treatment of unforeseen events, as set out in its July 14, 2008 EB-2007-0673 Report of the Board on 3rd Generation Incentive Regulation for Ontario’s Electricity Distributors , will continue under all three menu options.		
Deferral and Variance		Status quo	Status quo, plus as needed to track capital spending against plan	Disposition limited to Group 1 Separate application for Group 2
Performance Reporting and Monitoring		A regulatory review may be initiated if a distributor’s annual reports show performance outside of the ±300 basis points earnings dead band or if performance erodes to unacceptable levels.		

Alectra's rate revenues will increase in 2024 because of the increase in the inflation input in the rate setting Price Cap IR formula. It will clearly have more than enough money to spend on capital expenditures.²⁶ Yet it falsely claims that it will not because it has calculated its inflation factor differently²⁷.

Alectra is happy to use the OEB's inflation factor for setting its 2024 rates but wants to use its own much lower inflation factors for the calculation of Materiality Thresholds for the Enersource and PowerStream Rate Zones. CCMBC submits that Alectra's proposal to use different inflation factors for rate setting and ICM determination is based on a misunderstanding of the OEB's rate setting policies by Alectra (and by the OEB Staff in its argument in a previous case²⁸). The proposal is wrong and the OEB must reject it.

The Means Test

The OEB requires that a distributor seeking funding prove that it needs it.

*"If the regulated return exceeds 300 basis points above the deemed return on equity embedded in the distributor's rates, the funding for any incremental capital project will not be allowed."*²⁹

According to the evidence the 2022 regulated return of Alectra did not exceed 300 basis points above the Board-approved ROE. Alectra Utilities 2022 ROE was calculated to be 6.70%, 225 basis points below a calculated ROE for Alectra Utilities of 8.95%.³⁰

CCMBC Submission

The purpose of the Means Test is to show that applicant does not have the means to fund its entire capital program from its earnings and needs additional funds from ratepayers. The ROE calculation is designed to prove that. CCMBC accepts that Alectra's 2022 earnings were lower than the OEB approved return. Alectra's equity returns in 2020, 2021, and 2022 were respectively 4.8%, 6.8%, and 6.7% far below the OEB approved rate of 8.95%³¹. However, CCMBC notes that when Enersource and PowerStream merged in 2016, ratepayers were promised efficiencies and savings in both Capital and OM&A.

²⁶ 1-Staff-1d

²⁷ CCMBC-3

²⁸ EB-2022-0013 Decision, Page 8

²⁹ EB-2014-0219 Report of the OEB, *New Policy Options for the Funding of Capital Investments: The Advanced Capital Module*, September 18, 2014, section 4.1.4, Page 15

³⁰ Exhibit 2, Tab 1, Schedule 1, page 12.

³¹ EB-2022-0013, CCC-1(3)

Low earnings are evidence that Alectra has not managed to find these promised efficiencies and savings in six years. Such evidence of poor management would not be tolerated in other businesses. Alectra should not be rewarded for poor management.

In its evidence Alectra mentions one of the OEB conditions in its ICM policy for utilities in years six to ten of the deferred rebasing period, which applies to Alectra.

*History of good utility practice in capital planning, capital program management and asset maintenance.*³²

CCMBC believes that if Alectra had good utility practice in capital planning, capital program management and assets maintenance it would not suddenly have an urgent need for cable renewal work and it could have deferred some of its other capital projects or found more efficient ways of managing them.

Conclusion

The OEB regulates 58 electricity distributors in Ontario. No other regulator in Canada regulates as many distributors. To be able to regulate so many distributors, the OEB has put in place codes, regulations, policies, filing requirements and guidelines which distributors must follow. However, Alectra believes that it is special and that it does not need to follow the policy for ICM applications. Instead of following the policy for the determination of the Materiality Threshold for ICM applications, Alectra developed its own policy that results in a lower materiality threshold so that it can justify its demand for incremental funding from ratepayers. The OEB's policy shows that Alectra clearly does not need incremental funding for its capital program. At its recent Policy Day, the OEB indicated that it plans to review its ICM policy within the next two years. CCMBC submits that there should be no change to the ICM policy just to accommodate Alectra prior to that review.

Despite OEB's indication in its decision on Alectra's previous ICM application, Alectra did not prioritize the projects in its 2024 capital program. It did not provide sufficient evidence to the OEB to justify its decision to apply for approval for ICM funding of specific cable renewal projects.

For these reasons, CCMBC submits that the OEB should not approve Alectra's request for ICM funding from ratepayers for its 2024 cable renewal projects.

Respectfully submitted on behalf of CCMBC by its consultant,
Tom Ladanyi, TL Energy Regulatory Consultants Inc.

³² Exhibit 2, Tab 1, Schedule 1, Page 2