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October 20, 2023

Sent by EMAIL, RESS e-filing

Nancy Marconi
Registrar
Ontario Energy Board
27-2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Marconi:

**Re: EB-2023-0161: EPCOR Natural Gas Limited Partnership's ("EPCOR") 2024
Incentive Rate Adjustment Application – Southern Bruce – Reply Submission**

The comments below are EPCOR's reply to the OEB Staff submission of October 19, 2023.

Reference: Page 8:

OEB staff submits that if the OEB determines that the ORDA allocation methodology should be revised, the OEB should provide a draft rate order process to allow EPCOR to update the draft rate order.

If the OEB determines the allocation methodology for ORDA as proposed by EPCOR is appropriate, OEB staff is of the view that no draft rate order process is required as the latest inflation factor has already been applied in the IR Adjustment and any update to the Q4 interest rates would result in an immaterial change to the deferral account balances. However, OEB staff requests that EPCOR provide its views on the need for a draft rate order process in its reply submission.

EPCOR is in agreement with the comments from OEB Staff. Should the OEB agree that a revision to the ODRA rate rider methodology is appropriate, EPCOR would propose to update the Q4 2023 interest rate at the same time.

Should no further rate rider adjustments be necessary, EPCOR would not object to foregoing the draft rate order process (consistent with the Aylmer IRM filing (EB-2023-0161)).

EPCOR has no additional commentary to add to the record in response to OEB Staff's submission.

Please feel free to contact me if you have any questions regarding this matter.

Sincerely,

Tim Hesselink, CPA
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