

December 5, 2023

BY RESS and EMAIL

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor, P.O. Box 2319
Toronto, ON M4P 1E4
Email: registrar@oeb.ca

Dear Ms. Marconi;

**RE: APPLICATION BY ALECTRA UTILITIES CORPORATION FOR DISTRIBUTION RATES
EFFECTIVE JANUARY 1, 2024 (EB-2023-0241)**

On August 17, 2023, Alectra Utilities filed an application with the Ontario Energy Board (“OEB”) under Section 78 of the *Ontario Energy Board Act, 1998* as amended and pursuant to the OEB’s *Filing Requirements for Incentive Rate-setting Applications* seeking approval for electricity distribution rates, and other charges, effective January 1, 2024. The OEB assigned File Number EB-2023-0241 to the Application.

The OEB issued a Draft Decision and Rate Order (“the Draft Decision”) on this matter on November 30, 2023. The Board directed Alectra Utilities to advise the OEB, in writing, of any concerns (e.g., typographical or transposition errors, omissions, need for clarification, etc.) with respect to the Draft Decision, by December 7, 2023.

Alectra Utilities herein provides comments related to certain items contained in the Decision, below:

1. Tariff of Rates and Charges – Rate Accuracy, Rate Description and Formatting

Alectra Utilities has reviewed the Tariff of Rates and Charges set out in Schedule A and confirms that the rates, rate descriptions and formatting are complete and accurate.

2. Rate Generator Model Correction

Alectra Utilities has reviewed the Rate Generator Models (“RGM”) and observes the following issue in the RGM for the Enersource RZ regarding the volume used for the calculation of the RTSRs for Residential, General Service less than 50kW and Unmetered Scattered Load Classes in Tab 21. Bill Impacts. Alectra Utilities has updated the volume used for the calculation of the RTSRs to reflect metered consumption (non-loss adjusted) for the three identified rate classes. An updated RGM for the Enersource RZ is filed as Attachment 1.

3. Decision Narrative Corrections

Alectra Utilities notes that at page 1 of the Draft Decision, the OEB states *“For the Enersource RZ, there will be a monthly total bill increase of \$4.18.”* Alectra Utilities submits that the record should be updated to reflect a monthly total bill increase of \$4.13, consistent with the updated bill impacts for the Enersource RZ included in Tab 21 of Attachment 1. Alectra Utilities also submits that the file number for this proceeding should be updated from EB-2022-0185 as presented at page 1 to EB-2023-0241.

Alectra Utilities notes that at page 20, footnote 33 of the Draft Decision, the OEB refers to *“Guidance on Prospective Lost Revenue Adjustment Mechanism (LRAM) Amounts – 2023 Rates, June 16, 2022”*. Alectra Utilities submits that the reference should be updated to *“Guidance on Prospective Lost Revenue Adjustment Mechanism (LRAM) Amounts – 2024 Rates, June 16, 2023.”*

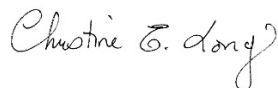
Alectra Utilities observes that at page 21 of the Draft Decision, the OEB states *“The resulting total bill impact is about ... and 7% for the Brampton RZ Unmetered Scattered Load rate class.”* Alectra Utilities submits that the record should be updated to reflect an 8% total bill impact for the Brampton RZ Unmetered Scattered Load rate class.

Alectra Utilities also observes that at page 23 of the Draft Decision, the OEB states *“The OEB approved 2021 RGCRP funding for ... Enersource RZ in in its decision on Alectra Utilities’ 2021 rate application (the 2021 Rates Decision).”* Alectra Utilities submits that the word ‘in’ is duplicated in the sentence.

Finally, Alectra Utilities also notes that at page 28 of the Draft Decision, the OEB states: *“In its 2020 rate application, Alectra Utilities filed a proposal for an ESM in which earnings in excess of 200 basis points above the OEB’s established ROE....”* Alectra Utilities submits that the record should be updated to reflect that Alectra’s ESM proposal specified earnings in excess of 300 basis points above the OEB’s established ROE, and not 200 basis points.

Should you have any questions or require additional information, please do not hesitate to contact me.

Yours truly,



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cc: Charles Keizer, Torys LLP