

March 19, 2024

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario M4P 1E4
Registrar@oeb.ca

**Re: ERTH Power Corporation (“ERTH Power”)
Reply Submission
2024 Electricity Distribution Rate Application
File Number: EB-2023-0019**

Dear Ms. Marconi

In accordance with Procedural Order No. 3 in the above-referenced proceeding, ERTH Power is submitting its reply submission. ERTH Power has submitted these documents through the Regulatory Electronic Submissions system and posted these material on its website at www.ertpower.ca.

If you have any questions or concerns with respect to this submission please do not hesitate to contact Diane Taylor at 519-485-1820 ext. 265.

Sincerely,



Graig Pettit
Vice President & General Manager
ERTH Power Corporation

C: All parties in EB-2023-0019

EB-2023-0019

Your Hometown Utility

Application for Rates Effective May 1, 2024

Submissions of
ERTH Power Corporation
March 19, 2024



On March 5, 2024, OEB Staff provided its submission on the above-reference proceeding.

OEB Staff took no issue with ERTH Power’s proposed price cap adjustment, adjustments to its RTSRs and UTRs, nor the disposition of its Group 1 Deferral and Variance Accounts (excluding Accounts 1588 and 1589).

OEB Staff made detailed submissions on ERTH Power’s proposal to dispose of Accounts 1588 and 1589 as well as, its retroactive adjustments to an error in the 2023 GA Rate Riders for ERTH Power’s Main rate zone.

Disposition of Accounts 1588 and 1589 – Main and Goderich Rate Zones

ERTH Power has examined the position of OEB Staff and agrees that the existing evidentiary record would benefit from further details. In response, ERTH Power will include evidence consistent with the suggestions from OEB Staff as part of its subsequent rates proceeding, as well as any other relevant information available at that time. Accordingly, ERTH Power is requesting to withdraw its request for disposition of Accounts 1588 and 1589 at this time.

Retroactive Adjustments to an Error in the 2023 GA Rate Riders (Main) & Removal of Class A Consumption for the Main & Goderich Rate Zone

In its reply submission, OEB staff endorsed ERTH Power’s request for a retroactive adjustment totalling \$745,923. Additionally, OEB staff proposed that ERTH Power should compute an additional set of 2023 GA rate riders that would draw down the approved 2023 GA balance that should have already been transferred to Account 1595 (2023).

ERTH Main Revised GA Rate Rider		Total Metered Non-RPP 2021 Consumption excluding WMP	Total Metered 2021 Consumption for Class A Customers that were Class A for the entire period GA balance accumulated	Non-RPP Metered 2021 Consumption for Current Class B Customers (Non- RPP Consumption excluding WMP, Class A and Transition Customers' Consumption)	% of total kWh	Total GA \$ allocated to Current Class B Customers	Supplementary GA Rate Rider		Supplementary Rate Rider \$'s
		kWh	kWh	kWh					
RESIDENTIAL SERVICE CLASSIFICATION	kWh	5,653,612	0	5,653,612	4.6%	\$34,044	\$0.0060	kWh	\$34,043.78
GENERAL SERVICE LESS THAN 50 KW SERVICE CLASSIFICATION	kWh	11,835,687	0	11,835,687	9.6%	\$71,270	\$0.0060	kWh	\$71,269.76
GENERAL SERVICE 50 TO 999 KW SERVICE CLASSIFICATION	kWh	94,930,055	16,214,116	78,715,939	63.5%	\$473,996	\$0.0060	kWh	\$473,995.83
GENERAL SERVICE 1,000 TO 4,999 KW SERVICE CLASSIFICATION	kWh	82,399,623	73,035,905	9,363,718	7.6%	\$56,385	\$0.0060	kWh	\$56,384.56
LARGE USE SERVICE CLASSIFICATION	kWh	97,230,798	97,230,798	0	0.0%	\$0			\$0.00
UNMETERED SCATTERED LOAD SERVICE CLASSIFICATION	kWh	51,696	0	51,696	0.0%	\$311	\$0.0060	kWh	\$311.29
SENTINEL LIGHTING SERVICE CLASSIFICATION	kWh	0	0	0	0.0%	\$0			\$0.00
STREET LIGHTING SERVICE CLASSIFICATION	kWh	1,467,182	0	1,467,182	1.2%	\$8,835	\$0.0060	kWh	\$8,834.78
EMBEDDED DISTRIBUTOR SERVICE CLASSIFICATION	kWh	16,786,736	0	16,786,736	13.6%	\$101,083	\$0.0060	kWh	\$101,082.99
Total		310,355,389	186,480,819	123,874,570	100.0%	\$745,923			\$745,923.00

Moreover, OEB staff observed that the consumption data for Class A in 2021 ought to be excluded from the determination of the GA rate riders within the Goderich rate zone and the CBR Class B rate riders across both the Main and Goderich Rate Zones.

ERTH Power concurs with OEB staff and has provided updated IRM rate models with supplemental rate riders for the Main rate zone as well as separate rate rider calculations for the remainder of its 2023 GA and CBDR B amounts.



ERTH Power has provided calculations for the Goderich rate zone GA and CBDR B with the removal of the Class A consumption data. ERTH Power notes that the difference for the under recovered GA rate rider and CBDR B Rates from the 2023 IRM approval are not material enough to warrant a supplemental rate rider and thus has not included supplemental rate riders for the Goderich rate zone. ERTH Power will dispose of any difference in its application to dispose of the remaining 1595 balances in its normal course. The following table details the difference resulting from the omission of the class A kWh's:

Recovery of Global Adjustment -Rates beginning May 1, 2023	IRM Decision	Revised Rate Rider	Difference
RESIDENTIAL SERVICE CLASSIFICATION	\$0	\$1,467	\$1,467
GENERAL SERVICE LESS THAN 50 KW SERVICE CLASSIFICATION	\$0	\$8,063	\$8,063
GENERAL SERVICE 50 TO 999 KW SERVICE CLASSIFICATION	\$22,576	\$35,259	\$12,683
GENERAL SERVICE 500 TO 4,999 KW SERVICE CLASSIFICATION	\$3,087	\$4,821	\$1,734
TOTAL	\$25,663	\$49,610	\$23,947
Recovery of CBDR B -Rates beginning May 1, 2023			
	IRM Decision	Revised Rate Rider	Difference
RESIDENTIAL SERVICE CLASSIFICATION	(\$5,163)	(\$5,163)	\$0
GENERAL SERVICE LESS THAN 50 KW SERVICE CLASSIFICATION	(\$2,087)	(\$2,087)	\$0
GENERAL SERVICE 50 TO 999 KW SERVICE CLASSIFICATION	(\$2,451)	(\$3,008)	(\$557)
GENERAL SERVICE 1,000 TO 4,999 KW SERVICE CLASSIFICATION	(\$1,912)	(\$316)	\$1,596
UNMETERED SCATTERED LOAD SERVICE CLASSIFICATION	(\$17)	(\$17)	\$0
STREET LIGHTING SERVICE CLASSIFICATION	(\$16)	(\$16)	\$0
TOTAL	(\$11,645)	(\$10,606)	\$1,039

All of which is respectfully submitted.

