OEB Staff Interrogatories Niagara-on-the-Lake Hydro Inc. EB-2024-0044

Please note, Niagara-on-the-Lake Hydro Inc. (NOTL Hydro) is responsible for ensuring that all documents it files with the OEB, including responses to OEB staff interrogatories and any other supporting documentation, do not include personal information (as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*), unless filed in accordance with rule 9A of the OEB's *Rules of Practice and Procedure*.

Staff Question-1

Ref 1: 2025 Application, Exhibit 9, Page 15 Ref 2: 2025 Application, Exhibit 9, Page 22

OEB staff notes that NOTL Hydro uses OEB prescribed interest rates up to Q3 2024 according to Reference 1. OEB has published the prescribed interest rates for Q4 2024.

Question(s):

- a) Please update the applicable schedules, using the Q4 2024 rates.
- b) Please update Table 19 (1508 Large Use Deferral Account Continuity) in Reference 2, using the Q4 2024 rates.

NOTL Hydro Response

- a) Updated Revised NOTLH Appendix 2 2025 IRM Rate Generator Model 20241007 attached
- b) Updated Revised tables 19 and 20 below

Table 19: 1508 Large Use Deferral Account Continuity

		2023									2024				2023 Balances
Account Number	Opening Principal Amounts as of Jan 1, 2023	(Credit)	Approved Disposition during	Balance as		Dec 31	OEB- Approved Disposition during 2023	Amounts	Principal Disposition during 2024 - instructed by OEB		Adjusted for Disposition	of Dec 31, 2023 Adjusted for	Dec 31, 2024 on Dec 31, 2023 balance adjusted for		Total Claim
1508	110,021	(59,840)	13,692	63,873	867	6,065	337	7,268	(123,713)	(7,287)	(59,840)	(19)	(3,079)	(3,098)	(62,938)

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Table 20: Allocation of Large Use Variance Account

Rate Class	kWh	kW	Customers	Distribution Revenue	% of Distribution Revenue	Allocation	Rate Ri	ider
Residential	75,197,151	-	8,433	3,178,366	52.5%	(33,051)	(0.33)	per customer
GS<50	44,452,363	-	1,485	1,328,655	22.0%	(13,817)	(0.0003)	per kWh
GS>50	87,200,974	231,213	130	1,072,551	17.7%	(11,153)	(0.0482)	per KW
Large User	55,314,603	93,106	1	231,541	3.8%	(2,408)	(0.0259)	per KW
USL	341,850	1	67	20,023	0.3%	(208)	(0.0006)	per kWh
Street Lights	572,726	1,598	2,305	221,251	3.7%	(2,301)	(1.4399)	per KW
Total	263,079,667	325,917	12,421	6,052,387	100.0%	(62,938)		

Staff Question-2

Ref 1: 2025 Application, Exhibit 9, Page 23

In Reference 1, NOTL Hydro states that it is electing to dispose of the Group 1 account balances even though they are below the disposition threshold of +/- \$0.001 per kWh.

Question(s):

a) Please explain why NOTL elects to dispose of its Group 1 account balances even they are below the disposition threshold.

NOTL Hydro Response

a) NOTL Hydro assessed the practicality of disposing of these balances and found there are no issues in doing so. Disposition in the earliest available year, in this case 2025, most closely aligns the refund of these amounts with the customers that contributed to the balances. The more time that passes between the accumulation in the variance account and the disposition, the more likely that customers will have left or arrived in our service territory.

Staff Question-3

Ref 1: Chapter 3 - Filing Requirements for Electricity Distribution Rate
Applications Filed in 2024 for Rates Taking Effect in 2025, June 18, 2024,
Page 16

Ref 2: 2025 IRM Rate Generator Model

Chapter 3 of the Filing Requirements in Reference 1 specifies that, when the OEB approves the disposition of Deferral and Variance Account (DVA) balances, the approved principal amounts and carrying charges are to be transferred to Account 1595 for the applicable rate year.

OEB staff observes that the principal and interest amounts in Sub-account 1595 (2023) and Sub-account 1595 (2024) in Reference 2 do not match the total amounts approved by the OEB for disposition.

Question(s):

- a) Please confirm OEB staff's observation.
 - i. Please provide an explanation for the discrepancy and revise the schedule as applicable.
 - ii. If not confirmed, please provide explanation.

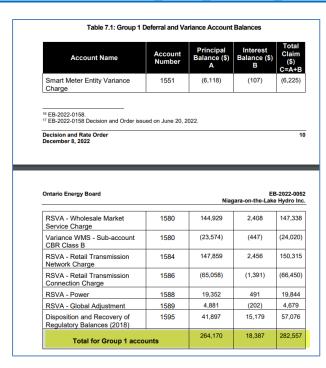
NOTL Hydro Response

a) Not confirmed, the principal and interest amounts in Sub-account 1595 (2023) and Sub-account 1595 (2024) in Reference 2 do match the total amounts approved by the OEB for disposition.

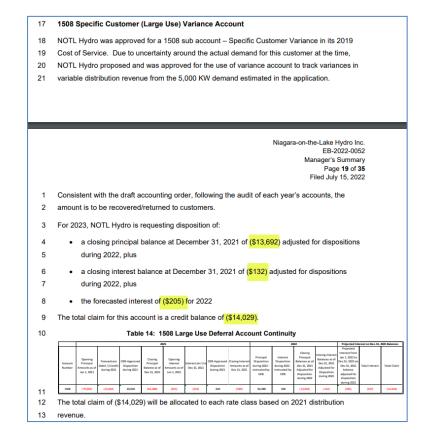
2023-1595

1595-2023	F	rincipal	Interest	Total	Source
Group 1 Deferral and Variance Account Balance	\$	264,170	\$ 18,387	\$ 282,557	EB-2022-0052 - Decision_rate order_NOTL_2023 IRM_20221208 - Table 7.1
Group 2 Deferral and Variance Account Balance	\$	(13,692)	\$ (337)	\$ (14,029)	EB-2022-0052 - NOTL_2023 IRM Appl_Managers Summary_20220715
LRAMVA	\$	8,454	\$ 180	\$ 8,634	EB-2022-0052 - Decision_rate order_NOTL_2023 IRM_20221208 - Table 8.2
Shared Tax Adjustment	\$	(6,919)	\$	\$ (6,919)	EB-2022-0052 - Decision_rate order_NOTL_2023 IRM_20221208 - page 6
Total 1595 2023 Approved Balance	\$	252,013	\$ 18,231	\$ 270,243	
DVA Continuity	\$	(252,013)	\$ (18,231)	\$ (270,243)	EB-2024-0044 - Appendix 2 Tab 3
Variance	\$		\$ -	\$ -	

EB-2022-0052 - Decision rate order_NOTL_2023 IRM_20221208 - Table 7.1



EB-2022-0052 - NOTL 2023 IRM Appl Managers Summary 20220715



Please note that amount of \$50,845 in the EB2022-0052 Decision and Rate Order is incorrect. It appears this amount was not updated from the prior year. \$50,845 was the amount requested and approved for disposition in NOTL Hydro's 2022 IRM EB-2021-0045. The requested amount for the 2023 IRM was a credit balance \$14,029 as presented in the Managers summary in that case.

EB-2022-0052 - Decision rate order NOTL 2023 IRM 20221208 - Table 8.2

Findings

The OEB finds that Niagara-on-the-Lake Hydro's LRAMVA balance has been calculated in accordance with the OEB's CDM-related guidelines and updated LRAMVA policy. The OEB approves the disposition of Niagara-on-the-Lake Hydro's LRAMVA debit balance of \$8,634, as set out in Table 8.2 below.

Table 8.2 LRAMVA Balance for Disposition

Account Name	Account Number	Actual CDM Savings (\$) A	Forecasted CDM Savings (\$) B	Carrying Charges (\$) C	Total Claim (\$) D=(A-B)+C
LRAMVA	1568	109,788	101,334	180	8,634

The balance in the LRAMVA is now zero, and no further entries to the LRAMVA are permitted at this time. The LRAMVA will not be discontinued, in the event that Niagara-on-the-Lake Hydro requests the use of the LRAMVA for a CDM activity in a future application, which the OEB will consider on a case-by-case basis.²⁷

EB-2022-0052 - Decision rate order NOTL 2023 IRM 20221208 - page 6

Ontario Energy Board

EB-2022-0052 Niagara-on-the-Lake Hydro Inc.

5. SHARED TAX ADJUSTMENTS

In any adjustment year of an IRM term, a change in legislation may result in a change to the amount of taxes payable by a distributor. The impacts of such legislated tax changes are shared equally between shareholders and customers. The shared tax change amount, whether in the form of a credit or a debit, will be assigned to customer rate classes in the same proportions as the OEB-approved distribution revenue by rate class from the distributor's last cost of service proceeding.

The application identifies a total tax decrease of \$13,838, resulting in a shared amount of \$6,919 to be refunded to ratepayers.

This allocated tax sharing amount does not produce a rate rider to the fourth decimal place, in one or more rate classes. In such situations where the Rate Generator Model does not compute rate riders, distributors are required to transfer the entire OEB-approved tax sharing amount into the Disposition and Recovery of Regulatory Balances Control Account (Account 1595) for disposition at a later date.

Findings

The OEB approves the tax sharing refund of \$6,919.

As the allocated tax sharing amount does not produce a rate rider in one or more rate classes, the OEB directs Niagara-on-the-Lake Hydro to record the credit amount of \$6,919 into Account 1595 - Sub-account Principal Balances Approved for Disposition in 2023.

2024-1595

1595-2024	Principal	Interest	Total	Source		
Group 1 Deferral and Variance Account Balance	\$ 774,499	\$ 49,300	\$ 823,799	EB-2023-0052 - NOTL_2024_DVA Continuity Schedule CoS 20231107 - Tab 2a		
Group 2 Deferral and Variance Account Balance	\$ 147,549	\$ (408)	\$ 147,141	EB-2023-0052 - NOTL_2024_DVA Continuity Schedule CoS 20231107 - Tab 2b		
Accounting Changes Under CGAAP Balance + Return Component	\$ 145,840		\$ 145,840	EB-2023-0052 - NOTL_2024_DVA Continuity Schedule CoS 20231107 - Tab 2b		
Total 1595 2023 Approved Balance	\$ 1,067,888	\$ 48,893	\$ 1,116,781			
DVA Continuity	\$ (1,067,888	\$ (48,893)	\$ (1,116,781)	EB-2024-0044 - Appendix 2 Tab 3		
Variance	\$ -	\$ -	\$ -			

EB-2023-0052 - NOTL 2024 DVA Continuity Schedule CoS 20231107 - Tab 2a

			2	023		Project	ed Interest on l		2.1.7 RRR	ĺ		
Account Descriptions			during 2023 -	Closing Principal Balances as of Dec 31-22 Adjusted for Dispositions during 2023	Closing Interest Balances as of Dec 31-22 Adjusted for Dispositions during 2023	Projected Interest from Jan 1, 2023 to December 31, 2023 on Dec 31 -22 balance adjusted for disposition during 2023 (2)	Projected Interest from January 1, 2024 to April 30, 2024 on Dec 31 -22 balance adjusted for disposition during 2023 (2)	Total Interest	Total Claim	Accounts To Dispose Yes/No	As of Dec 31-22	Variance RRR vs. 202: Balance (Principal + Interest)
Group 1 Accounts												
LV Variance Account	1550	\$0	\$0	\$0	\$0	\$0	,	\$0	\$0.00		\$0	
Smart Metering Entity Charge Variance Account	1551	-\$6,118	-\$107	-\$27,321	-\$302	-\$1,344		-\$1,646	-\$28,966.63		-\$33,848	
RSVA - Wholesale Market Service Charge ⁵	1580	\$144,929	\$2,408	\$427,715	\$6,801	\$21,033		\$27,834	\$455,549.27		\$537,234	-\$44,
Variance WMS - Sub-account CBR Class A ⁶	1580	\$0	\$0	\$0	\$0	\$0		\$0	\$0.00		\$0	
Variance WMS - Sub-account CBR Class B ⁵	1580	-\$23,574	-\$446	-\$20,096	-\$504	-\$988	,	-\$1,493	-\$21,588.29		-\$44,620	
RSVA - Retail Transmission Network Charge	1584	\$147,859	\$2,456	\$307,628	\$4,354	\$15,128		\$19,482	\$327,109.80		\$462,298	
RSVA - Retail Transmission Connection Charge	1586	-\$65,058	-\$1,391	\$35,576	\$141	\$1,749		\$1,891	\$37,467.18		-\$30,732	
RSVA - Power (excluding Global Adjustment) ⁴	1588	\$19,352	\$491	\$21,314	\$253	\$1,048		\$1,301	\$22,614.42		\$41,410	
RSVA - Global Adjustment ⁴	1589	\$4,881	-\$202	\$29,683	\$471	\$1,460		\$1,930	\$31,613.53		\$34,833	
Disposition and Recovery/Refund of Regulatory Balances (2017 and pre-2017) ³	1595			\$0	\$0			\$0	\$0.00	No	\$0	
Disposition and Recovery/Refund of Regulatory Balances (2018) ²	1595	\$41,897	\$15,179	\$0	\$175			\$175	\$0.00	No	\$57,251	
Disposition and Recovery/Refund of Regulatory Balances (2019) ³	1595	\$0	\$0	\$0	\$12,720	\$0	,	\$12,720	\$0.00	No	\$12,720	
Disposition and Recovery/Refund of Regulatory Balances (2020) ²	1595	\$0	\$0	\$36,044	\$16,567	\$1,772	,	\$18,339	\$0.00	No	\$52,610	
Disposition and Recovery/Refund of Regulatory Balances (2021) ²	1595	\$0	\$0	\$8,840	\$0	\$435		\$435	\$0.00	No	\$8.840	
Disposition and Recovery/Refund of Regulatory Balances (2022) ³	1595	\$0	\$0	-\$25,559	-\$10,392	-41257	,	-\$11,649	\$0.00	No	-\$35,952	
Disposition and Recovery/Refund of Regulatory Balances (2023) ²	1595	-\$269,408	-\$18 231	\$269,408	\$18,231	\$13.588	,	\$31,819	\$0.00	No	400,000	
Refer to the Filing Requirements for Account 1535 disposition eligibility.		.200,100	310,201	.200,100	*10,201	*10,000		***************************************	****			
Group 1 total (including Account 1589)		-\$5,238	\$157	\$1,063,231	\$48,514	\$52,625	40	\$101,139	\$823,799.28			
Group 1 total (excluding Account 1589)		-\$10,120	\$359	\$1,033,548	\$48,044	\$51,165	\$0	\$99,209	\$792,185.74			
RSVA - Global Adjustment	1589	\$4,881	-\$202	\$29,683	\$471	\$1,460	\$0	\$1,930	\$31,613.53			

EB-2023-0052 - NOTL 2024 DVA Continuity Schedule CoS 20231107 - Tab 2b

		:023		F	Projected Intere	st on Dec-31-22 E	Balances	
Account Descriptions	Account Number	Closing Principal Balances as of Dec 31-22 Adjusted for	Closing Interest Balances as of Dec 31-22 Adjusted for	from Jan 1, 2023 to	Projected Interest from January 1, 2024 to April 30, 2024 on Dec 31 -22 balance adjusted for	Total laterest	Total Claim	Accounts t Dispose Yes/No
Group 2 Accounts								
Deferred IFRS Transition Costs	1508	\$0	\$0		,	\$0	\$0.00	
Pole Attachment Revenue Variance ^s	1508	\$5,650	-\$1,208	\$278	,	-\$930	\$4,720.03	
Retail Service Charge Incremental Revenue ^s	1508	\$0	\$0		,	\$0	\$0.00	
Dustomer Choice Initiative Costs*	1508	\$17,422	\$380	\$857	,	\$1,236	\$0.00	No
Local Initiatives Program Costs*	1508	\$0	\$0		,	\$0	\$0.00	
Green Button Initiative Costs**	1508	\$328	\$6	\$16	•	\$22	\$0.00	No
Other Regulatory Assets, Sub-account Designated Broadband Project Impacts ⁴¹	1508	\$0	\$0	•	,	\$0	\$0.00	
DEB Cost Assessment	1508	\$14,771	\$825	\$726		\$1,551	\$0.00	No
arge Use Variance Account	1508	\$123,713		\$6,084	,	\$7,287	\$131,000.02	Yes
Retail Cost Variance Account - Retail ^s	1518	\$8,590	\$608		,	\$1,030	\$3,620.32	
Pension & OPEB Forecast Accrual versus Actual Cash Payment Differential Carrying Charges*		\$0	-\$8,950	\$0		-\$8.950	-\$8.949.73	
Misc. Deferred Debits	1525	\$0	\$0	**	,	\$0	\$0.00	
Retail Cost Variance Account - STR ⁴	1548	\$9,596	\$683	\$472	,	\$1,155	\$10,750.46	
Extra-Ordinary Event Costs	1572	\$0,550	\$0	φ+1 L	,	\$0	\$0.00	
Deferred Rate Impact Amounts	1574	\$0	\$0		,	\$0	\$0.00	
RSVA - One-time	1582	\$0	\$0		,	\$0	\$0.00	
Other Deferred Credits	2425	\$0	\$0		,	\$0	\$0.00	
PILs and Tax Variance for 2006 and Subsequent Years excludes sub-account and contra account below)	1592	\$0	\$0		,	\$0	\$0.00	
PILs and Tax Variance for 2006 and Subsequent Years- Sub-account CCA Changes ¹⁸	1592	\$0	\$0		,	\$0	\$0.00	
	1002					**		
Total of Group 2 Accounts Above		\$180,069	-\$6,453	\$8,855	\$0	\$2,402	\$147,141.10	
.RAM Variance Account®	1568	\$0	\$0	\$0	•	\$0	\$0.00	
Total including Account 1568		\$180,069	-\$6,453	\$8,855	\$0	\$2,402	\$147,141.10	
Pension & OPEB Forecast Accrual versus Actual Cash Payment Differential*	1522	-\$146,600	\$0		,	\$0	-\$146.600.42	
Pension & OPEB Forecast Accrual versus Actual Cash Payment Differential Contra Account	1522	\$146,600	\$0		,	\$0	\$146,600.42	
Renewable Generation Connection Capital Deferral Account	1531	\$0	\$0		,	\$0	\$0.00	
Renewable Generation Connection OM&A Deferral Account	1532	\$0	\$0		,	\$0	\$0.00	
Renewable Generation Connection Funding Adder Deferral Account	1533	\$0	\$0		,	\$0	\$0.00	
Smart Grid Capital Deferral Account	1534	\$0	\$0			\$0	\$0.00	
Smart Grid OM&A Deferral Account	1535	\$0	\$0			\$0	\$0.00	
Smart Grid Funding Adder Deferral Account	1536	\$0	\$0			\$0	\$0.00	
Smart Meter Capital and Recovery Offset Variance - Sub-Account - Stranded Meter Costs	1555	\$0	\$0			\$0	\$0.00	No
Meter Cost Deferral Account (MIST Meters) ^a	1557	\$0	\$0			\$0	\$0.00	
	1575	\$0					\$0.00	No
FRS-CGAAP Transition PP&E Amounts Balance + Return Component								
FRS-CGAAP Transition PP&E Amounts Balance + Return Component Accounting Changes Under CGAAP Balance + Return Component	1576	\$145,840					\$145,840.36	Yes

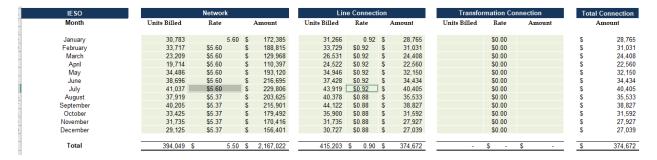
Staff Question-4

Ref 1: 2025 IRM Rate Generator Model, Tab 11 and Tab 12

On Tab 11, the 2023 July to December Network Service Rate is reported as \$5.37. On Tab 12, the July Network Rate is reported as \$5.60.

Similarly, on Tab 11, the 2023 July to December Line Connection Service Rate is reported as \$0.88. On Tab 12, the July Connection Service Rate is reported as \$0.92.

The image below identifies the two items of note:



Question(s):

a) Please explain the discrepancy. As needed, please correct the values reported on Tab 12 of the Rate Generator Model.

NOTL Hydro Response

a) The discrepancy was the result of how we were invoiced by the IESO. July 2023 was invoiced at the old rates of \$5.60 for Network and \$0.92 for Connection. This was corrected through an adjustment on the August 2023 invoice. For consistency, NOTL Hydro adjusted the amounts in Tab 12 of the revised IRM model submitted with these responses. The July 2023 Network rate was changed from \$5.60 to \$5.37, and the Connection rate was changed from \$0.92 to \$0.88.