

**GrandBridge Energy Inc.  
Interrogatory Responses  
EB-2024-0025  
October 3, 2024**

**Staff Question-1**

**Ref 1:** 2025 Rate Generator Model (BPI), Tab 3, Continuity Schedule

**Ref 2:** 2025 Rate Generator Model (EPLUS), Tab 3, Continuity Schedule

**Preamble:**

On September 13, 2024, the OEB published the 2024 Quarter 4 prescribed accounting interest rates applicable to the carrying charges of deferral, variance and construction work in progress (CWIP) accounts of natural gas utilities, electricity distributors and other rate-regulated entities.

**Question(s):**

- a) Please update Tab 3 (Continuity Schedule) as necessary to reflect the Q4 2024 OEB-prescribed interest rate of 4.4%.

**Response:**

- a) GrandBridge Energy has updated Tab 3 (Continuity Schedule) of the 2025 IRM Model to reflect the Q4-2024 OEB-prescribed interest rate of 4.4%.

**Staff Question-2**

**Ref 1:** 2025 IRM Rate Generator Model (BPI), Continuity Schedule, Tab 3

**Ref 2:** 2025 IRM Rate Generator Model (EPLUS), Continuity Schedule, Tab 3

**Ref 3:** Chapter 3 - Filing Requirement for Electricity Distribution Rate Applications Filed in 2024 for Rates Taking Effect in 2025, June 18, 2024, Page. 14

**Preamble:**

Chapter 3 of the Filing Requirements in Ref. 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 that rate year. OEB staff notes that the transfer of OEB approved disposition amounts are not reflected in Account 1595 (2024) in Ref. 1 and Ref. 2.

**Question(s):**

- a) Please explain why the transfer of OEB-approved disposition amounts is not reflected in Sub-account 1595 (2024) in Ref. 1 and Ref 2.

**Response:**

- a) GrandBridge Energy has updated Tab 3 (Continuity Schedule) of the 2025 IRM Model to reflect the transfer of OEB-approved disposition amounts in Sub-account 1595 (2024) in Ref. 1 and Ref. 2.

**Staff Question-3**

**Ref 1:** 2024 IRM Rate Generator Model, Continuity Schedule, Tab 3

**Ref 2:** IRM Rate Generator – DVA Tabs Instructions - 2024 Rates

**Ref 3:** OEB Guidance for Electricity Distributors with Forgone Revenues Due to Postponed Rate Implementation from COVID-19, August 6, 2020, Page 5

**Preamble:**

On July 18, 2023, the OEB issued the DVA Tabs Instructions for the 2024 IRM Rate Generator Model. Pages 1 and 3 noted that Account 1509 - Impacts Arising from the COVID-19 Emergency, Subaccount Forgone Revenues from Postponing Rate Implementation was added to the model. A separate rider is calculated for this account in Tab 7, if the disposition is approved.

Regarding Account 1509, Impacts Arising from the COVID-19 Emergency Account, Sub-account Forgone Revenues from Postponing Rate Implementation, the following steps are noted in the August 6, 2020 guidance:

1. Upon implementation of the forgone revenue rate rider that is calculated from the Forgone Revenue Model, the rate rider transactions will be recorded in the same Forgone Revenues Sub-account. This will draw down the accumulated balance of actual forgone revenues/amounts.
2. Any residual balance after the expiry of the rate riders should be requested for final disposition in a future rate application (cost of service or IRM), once the balance has been audited in accordance with normal deferral and variance account disposition practices.
3. If disposition is approved, the residual balance in the Forgone Revenues Sub-account should be disposed proportionately by customer class and the residual balance will be transferred to Account 1595.

**Question(s):**

- a) Please update Tab 3 (Continuity Schedule) and Tab 4 as necessary to reflect a balance in Account 1509 – Impacts Arising from the COVID-19 Emergency, Subaccount Forgone Revenues from Postponing Rate Implementation. Please complete the above-noted steps #1, #2, #3.
- b) If this balance is not applicable, please explain.

**Responses**

- a) GrandBridge Energy has updated Tab 3 (Continuity Schedule) of the 2025 IRM Model for the GBE(BPI) Rate Zone with the balances in Account 1509. GrandBridge Energy is not seeking the disposition of Account 1509, and as a result, Tab 4 has not been updated.
- b) GrandBridge Energy has not previously disposed of the balances in Account 1509. As documented in the “BPI 2022 Cost of Service Settlement”<sup>1</sup>, GrandBridge Energy reserves the right to bring a stand-alone application for the disposition of Account 1509.

**References:**

<sup>1</sup> EB-2021-0009: Decision and Order, Schedule A, Brantford, Settlement Proposal, 20210929, Page 41

**Staff Question-4**

**Ref 1:** 2025 IRM Rate Generator Model (BPI), Bill Impacts, Tab 21

**Ref 2:** 2025 IRM Rate Generator Model (EPLUS), Bill Impacts, Tab 21

**Preamble:**

The percentage change/impact percentage between current OEB approved and proposed charges of CBR Class B Rate Riders is -200% for consumption at 750 kWhs and 2,000 kWhs. Similar number of impacts on other consumption level.

**Question(s):**

- a) Please provide an explanation for the change.

**Response:**

The increase in the CBR Class B Rate Riders is attributable to increases in Capacity Based Recovery charges (Charge Type 1351) to GrandBridge Energy by the IESO.

Charge Type 1351 relates to the IESO’s Total Auction Capacity & Capacity Auction Clearing Price. In 2023, the IESO’s total Auction Capacity and Capacity Auction Clearing Price for the Winter Obligation Period (Nov 1, 2022 – Apr 30, 2023) and Summer Obligation Period (May 1, 2023 – Oct 31, 2023) increased, which contributed to increases in GrandBridge Energy’s IESO costs impacting DVA Account 1580-Class B (as described in the table 1 below).

**Table 1**

<b>DVA Account 1580- Class B</b>		
<b>GBE(E+)</b>	<b>2022</b>	<b>2023</b>
Revenue	\$ (488,395)	\$ (590,992)
Expense	\$ 396,908	\$ 763,062
<b>Total 1580-Class B</b>	<b>\$ (91,487)</b>	<b>\$ 172,070</b>
<b>GBE(BPI)</b>	<b>2022</b>	<b>2023</b>
Revenue	\$ (394,055)	\$ (304,933)
Expense	\$ 231,693	\$ 448,172
<b>Total 1580-Class B</b>	<b>\$ (162,362)</b>	<b>\$ 143,239</b>

## OEB Staff Questions - Brantford Power Rate Zone (GBE BPI)

### Staff Question-1

Ref 1: 2025 IRM Rate Generator Model (BPI), UTRs and Sub-TX, Tab 11.

Ref 2: 2025 IRM Rate Generator Model (BPI), RTSR Historical Wholesale, Tab 12.

### Preamble:

OEB staff notes an inconsistency in the values reported in Tab 12, with respect to the values that are provided on Tab 11 “UTRs and Sub-TX”.

ILSO Month	Network			Line Connection			Transformation Connection			Total Connection
	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Amount
January	141,269	\$5.60	\$ 791,106	147,295	\$0.92	\$ 135,512	111,189	\$3.10	\$ 344,686	\$ 480,198
February	138,634	\$5.60	\$ 775,790	146,635	\$0.92	\$ 134,904	107,820	\$3.10	\$ 334,242	\$ 469,146
March	132,396	\$5.60	\$ 741,418	146,964	\$0.92	\$ 135,198	99,364	\$3.10	\$ 307,997	\$ 443,195
April	126,325	\$5.60	\$ 707,420	185,564	\$0.92	\$ 170,719	144,545	\$3.10	\$ 448,070	\$ 618,809
May	171,627	\$5.60	\$ 961,111	178,197	\$0.92	\$ 163,941	124,287	\$3.10	\$ 385,290	\$ 549,231
June	185,445	\$5.60	\$ 1,038,492	210,542	\$0.92	\$ 193,699	143,019	\$3.10	\$ 443,601	\$ 614,299
July	189,155	\$5.60	\$ 1,059,238	222,573	\$0.92	\$ 206,364	154,695	\$3.10	\$ 479,657	\$ 665,931
August	167,050	\$5.37	\$ 897,275	189,532	\$0.88	\$ 169,180	127,931	\$2.98	\$ 381,233	\$ 530,421
September	154,304	\$5.37	\$ 824,412	200,669	\$0.88	\$ 176,589	151,275	\$2.98	\$ 450,000	\$ 627,368
October	171,418	\$5.37	\$ 916,796	180,651	\$0.88	\$ 168,976	138,481	\$2.98	\$ 412,673	\$ 571,619
November	152,474	\$5.37	\$ 818,785	155,737	\$0.88	\$ 137,049	119,364	\$2.98	\$ 355,675	\$ 492,723
December	149,971	\$5.37	\$ 805,344	156,999	\$0.88	\$ 138,159	120,964	\$2.98	\$ 360,473	\$ 496,632
<b>Total</b>	<b>1,923,038</b>	<b>\$ 5.50</b>	<b>\$ 10,576,209</b>	<b>2,081,349</b>	<b>\$ 0.90</b>	<b>\$ 1,880,297</b>	<b>1,542,996</b>	<b>\$ 3.05</b>	<b>\$ 4,704,327</b>	<b>\$ 6,584,624</b>

Hydro One Month	Network			Line Connection			Transformation Connection		
	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Units Billed	Rate	Amount
January		\$0.0000			\$0.0000			\$0.0000	
February		\$0.0000			\$0.0000			\$0.0000	
March		\$0.0000			\$0.0000			\$0.0000	
April		\$0.0000			\$0.0000			\$0.0000	
May		\$0.0000			\$0.0000			\$0.0000	
June		\$0.0000			\$0.0000			\$0.0000	
July		\$0.0000			\$0.0000			\$0.0000	
August		\$0.0000			\$0.0000			\$0.0000	
September		\$0.0000			\$0.0000			\$0.0000	
October		\$0.0000			\$0.0000			\$0.0000	
November		\$0.0000			\$0.0000			\$0.0000	
December		\$0.0000			\$0.0000			\$0.0000	
<b>Total</b>	<b>-</b>	<b>\$ -</b>	<b>\$ -</b>	<b>-</b>	<b>\$ -</b>	<b>\$ -</b>	<b>-</b>	<b>\$ -</b>	<b>\$ -</b>

Add Extra Host Here (I) (if needed) Month	Network			Line Connection			Transformation Connection		
	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Units Billed	Rate	Amount
January	18	\$ 3.9850	\$ 73	18	\$ 1.8192	\$ 33		\$ -	
February	19	\$ 3.9850	\$ 75	19	\$ 1.8192	\$ 34		\$ -	
March	17	\$ 3.9850	\$ 69	17	\$ 1.8192	\$ 31		\$ -	
April	17	\$ 3.9850	\$ 69	17	\$ 1.8186	\$ 31		\$ -	
May	85	\$ 3.9850	\$ 338	128	\$ 1.8193	\$ 234		\$ -	
June	198	\$ 3.9850	\$ 787	198	\$ 1.8192	\$ 359		\$ -	
July	192	\$ 3.9850	\$ 764	235	\$ 1.8192	\$ 427		\$ -	
August	177	\$ 3.9850	\$ 707	182	\$ 1.8192	\$ 331		\$ -	
September	146	\$ 3.9850	\$ 581	215	\$ 1.8192	\$ 390		\$ -	
October	85	\$ 3.9850	\$ 258	117	\$ 1.8192	\$ 212		\$ -	
November	23	\$ 3.9850	\$ 90	24	\$ 1.8192	\$ 43		\$ -	
December	17	\$ 3.9850	\$ 66	17	\$ 1.8192	\$ 30		\$ -	
<b>Total</b>	<b>973</b>	<b>\$ 3.99</b>	<b>\$ 3,877</b>	<b>1,185</b>	<b>\$ 1.82</b>	<b>\$ 2,156</b>	<b>-</b>	<b>\$ -</b>	<b>\$ -</b>

**Question(s):**

- a) Please explain the inconsistency in IESO, Hydro One Networks Inc. and the Extra host rates between Tab 11 and Tab 12.

**Response:**

- a) GrandBridge Energy has revised Tab 12 of the 2025 IRM Model and has adjusted the July figures in the IESO section for Network, Line Connection and Transformation Connection. The initial submission was based on rates from the Preliminary July IESO statement, which were subsequently adjusted on the Final invoice. The rates on Tab 12 in the 2025 IRM model are now consistent with Tab 11.

GrandBridge Energy has also updated the rates under the “Extra Host (I)” section in Tab 11 to four decimal places to align with the rates in Tab 12.

**Staff Question-2**

Ref 1: 2025 IRM Rate Generator Model (BPI), Bill Impacts, Tab 21

**Preamble:**

For the residential rate class the applicant must provide a scenario for consumption at 750 kWhs and at its 10th percentile.

RATE CLASSES / CATEGORIES <i>(eg: Residential TOU, Residential Retailer)</i>	Units	RPP? Non-RPP Retailer? Non-RPP Other?	Current Loss Factor <i>(eg: 1.035)</i>	Proposed Loss Factor	Consumption (kWh)
RESIDENTIAL SERVICE CLASSIFICATION		RPP	1.029	1.029	750
GENERAL SERVICE LESS THAN 50 KW SERVICE CLASSIFICATION		RPP	1.029	1.029	2,000
GENERAL SERVICE GREATER THAN 50 KW SERVICE CLASSIFICATION		Non-RPP (Other)	1.029	1.029	100,000
EMBEDDED DISTRIBUTOR SERVICE CLASSIFICATION		Non-RPP (Other)	1.029	1.029	2,000,000
SENTINEL LIGHTING SERVICE CLASSIFICATION		Non-RPP (Retailer)	1.029	1.029	55
STREET LIGHTING SERVICE CLASSIFICATION		Non-RPP (Retailer)	1.029	1.029	622,000
UNMETERED SCATTERED LOAD SERVICE CLASSIFICATION		Non-RPP (Other)	1.029	1.029	280
STANDBY POWER SERVICE CLASSIFICATION		Non-RPP (Other)	1.029	1.029	-
RESIDENTIAL SERVICE CLASSIFICATION		RPP	1.029	1.029	700
GENERAL SERVICE LESS THAN 50 KW SERVICE CLASSIFICATION		RPP	1.029	1.029	2,500
RESIDENTIAL SERVICE CLASSIFICATION		-	1.029	1.029	261
Add additional scenarios if required		700	1.029	1.029	
Add additional scenarios if required		2,500	1.029	1.029	
Add additional scenarios if required		261	1.029	1.029	

**Question(s):**

- a) Please confirm the numbers on Tab 21, Bill Impacts., Table 1 H40-H43. Please label and explain the numbers.

**Response:**

GrandBridge Energy has updated Table 21, Table 1, specifically cells H40 to H43 on Tab 21. The incorrect numbers have been removed, and “RPP” has been added to cell H40. GrandBridge Energy has confirmed that no additional scenarios are needed for cells H41 to H43. These updates have not impacted any data on the Bill Impacts tab.

Table 1

RATE CLASSES / CATEGORIES <i>(eg: Residential TOU, Residential Retailer)</i>	Units	RPP? Non-RPP Retailer? Non-RPP Other?	Current Loss Factor <i>(eg: 1.035)</i>	Proposed Loss Factor	Consumption (kWh)	Demand kW <i>(if applicable)</i>	RTSR Demand or Demand- Interval?	Applied to Fixed Charge for Unmetered Classes <i>(e.g. # of devices/connections )</i>
RESIDENTIAL SERVICE CLASSIFICATION	kWh	RPP	1.029	1.029	750		CONSUMPTION	
GENERAL SERVICE LESS THAN 50 KW SERVICE CLASSIFICATION	kWh	RPP	1.029	1.029	2,000		CONSUMPTION	
GENERAL SERVICE GREATER THAN 50 KW SERVICE CLASSIFICATION	kWh	Non-RPP (Other)	1.029	1.029	100,000	250	DEMAND	
EMBEDDED DISTRIBUTOR SERVICE CLASSIFICATION	kWh	Non-RPP (Other)	1.029	1.029	2,000,000	12,000	DEMAND	
SENTINEL LIGHTING SERVICE CLASSIFICATION	kWh	Non-RPP (Retailer)	1.029	1.029	55	1	DEMAND	1
STREET LIGHTING SERVICE CLASSIFICATION	kWh	Non-RPP (Retailer)	1.029	1.029	622,000	1,900	CONSUMPTION	5,849
UNMETERED SCATTERED LOAD SERVICE CLASSIFICATION	kWh	Non-RPP (Other)	1.029	1.029	280		CONSUMPTION	1
STANDBY POWER SERVICE CLASSIFICATION	kVA	Non-RPP (Other)	1.029	1.029	-			
RESIDENTIAL SERVICE CLASSIFICATION	kWh	RPP	1.029	1.029	700		CONSUMPTION	
GENERAL SERVICE LESS THAN 50 KW SERVICE CLASSIFICATION	kWh	RPP	1.029	1.029	2,500		CONSUMPTION	
RESIDENTIAL SERVICE CLASSIFICATION	kWh	RPP	1.029	1.029	261		CONSUMPTION	
Add additional scenarios if required			1.029	1.029				
Add additional scenarios if required			1.029	1.029				
Add additional scenarios if required			1.029	1.029				
Add additional scenarios if required			1.029	1.029				
Add additional scenarios if required			1.029	1.029				
Add additional scenarios if required			1.029	1.029				
Add additional scenarios if required			1.029	1.029				
Add additional scenarios if required			1.029	1.029				
Add additional scenarios if required			1.029	1.029				



## **OEB Staff Questions - Energy+ Rate Zone (GBE+)**

### **Staff Question-1**

**Ref 1:** 2025 Rate Generator Model (EPLUS), Tab 3, Continuity Schedule

**Ref 2:** EB-2024-0025, 2025 IRM application, Page 22

#### **Preamble:**

The last disposition of Group 1 account balances occurred in the 2024 IRM Application for the GBE(E+) Rate Zone where 2022 balances were approved on interim basis. GrandBridge is requesting final disposition of 2022 and 2023 balances for the GBE(E+) Rate Zone.

#### **Question(s):**

- a) Please confirm the disposition request for Account 1595, Sub-account 1595 (2020-2023).

#### **Response:**

- a) GrandBridge Energy confirms that it is requesting approval for the disposition of Account 1595 balances of \$(247,305) from 2020 and a balance of \$6,944 from 2021 for the GBE(E+) Rate Zone as two years have passed since the expiry date of the rate riders.

GrandBridge Energy confirms that disposition of residual balances for Account 1595 from 2020 and 2021 have not previously occurred as outlined in section 4.3.6.9. "Disposition of Account 1595" of the 2025 IRM application EB-2024-0025, Page 36-37.

**Staff Question-2**

**Ref 1:** 2025 IRM Rate Generator Model (EPLUS), UTRs and Sub-TX, Tab 11.

**Ref 2:** 2025 IRM Rate Generator Model (EPLUS), RTSR Historical Wholesale, Tab 12.

**Preamble:**

OEB staff notes an inconsistency in the values reported in Tab 12, with respect to the values that are provided on Tab 11 “UTRs and Sub-TX”.

IESO Month	Network			Line Connection			Transformation Connection		
	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Units Billed	Rate	Amount
January	235,980	\$5.60	\$ 1,327,088	252,077	\$0.92	\$ 231,911	169,437	\$3.10	\$ 525,255
February	241,934	\$5.60	\$ 1,354,830	270,429	\$0.92	\$ 248,795	179,232	\$3.10	\$ 555,619
March	221,081	\$5.60	\$ 1,238,054	260,194	\$0.92	\$ 230,178	160,949	\$3.10	\$ 498,942
April	220,555	\$5.60	\$ 1,235,108	334,607	\$0.92	\$ 307,838	242,443	\$3.10	\$ 751,572
May	284,728	\$5.60	\$ 1,594,477	301,501	\$0.92	\$ 277,381	205,437	\$3.10	\$ 635,855
June	274,746	\$5.60	\$ 1,538,578	309,061	\$0.92	\$ 284,336	210,340	\$3.10	\$ 652,054
July	312,705	\$5.60	\$ 1,751,148	343,826	\$0.92	\$ 316,320	222,405	\$3.10	\$ 689,456
August	275,775	\$5.37	\$ 1,480,910	286,883	\$0.88	\$ 252,457	197,283	\$2.98	\$ 587,904
September	314,590	\$5.37	\$ 1,689,348	335,554	\$0.88	\$ 295,288	226,365	\$2.98	\$ 674,571
October	285,025	\$5.37	\$ 1,530,584	298,388	\$0.88	\$ 262,581	204,240	\$2.98	\$ 598,635
November	247,459	\$5.37	\$ 1,328,855	257,562	\$0.88	\$ 226,555	161,012	\$2.98	\$ 479,816
December	245,497	\$5.37	\$ 1,318,319	254,620	\$0.88	\$ 232,856	169,473	\$2.98	\$ 505,030
<b>Total</b>	<b>3,151,075</b>	<b>\$ 5.50</b>	<b>\$ 17,387,299</b>	<b>3,504,701</b>	<b>\$ 0.90</b>	<b>\$ 3,166,605</b>	<b>2,348,617</b>	<b>\$ 3.06</b>	<b>\$ 7,165,707</b>

Uniform Transmission Rates	Unit	2023		2024		2025
		Jan to Jun	Jul to Dec	Jan to Jun	Jul to Dec	
Rate Description		Rate		Rate		Rate
Network Service Rate	kW	\$ 5.60	\$ 5.37	\$ 5.79	\$ 6.12	\$ 6.12
Line Connection Service Rate	kW	\$ 0.92	\$ 0.88	\$ 0.95	\$ 0.95	\$ 0.95
Transformation Connection Service Rate	kW	\$ 3.10	\$ 2.88	\$ 3.21	\$ 3.21	\$ 3.21

**Question(s):**

- a) Please explain the inconsistency in the IESO rates between Tab 11 and Tab 12.

**Response:**

- a) GrandBridge Energy has revised Tab 12 of the 2025 IRM Model and has adjusted the July figures in the IESO section for Network, Line Connection and Transformation Connection. The initial submission was based on rates from the preliminary July IESO statement, which were subsequently adjusted on the Final invoice. The rates on Tab 12 in the 2025 IRM model are now consistent with Tab 11.

**Staff Question-3**

**Ref 1:** GBE(EPLUS)2025 Generic LRAMVA Workform, Tab 1

**Preamble:**

Cell H22 contains a balance of \$75,959. It appears that Cells H19-H20 only includes 2023 actual and forecast lost revenues and not 2024 actuals and forecast.

**Question(s):**

- a) Please confirm that 2024 actuals and forecast have not been included.
- b) If confirmed, please input the correct balance and refile the GBE(EPLUS)2025 Generic LRAMVA Workform.

**Responses:**

- a) GrandBridge Energy confirms that 2024 actuals and forecast were not included in the balance on Cells H19-H20 in the application as filed.
- b) The GBE(EPLUS) 2025 Generic LRAMVA Workform -Tab 1 has been updated, and the Workform will be submitted with the responses.

**Staff Question-4**

Ref 1: GBE(EPLUS)2025 Generic LRAMVA Workform, Tab 6

**Preamble:**

The OEB has recently published its prescribed interest rate for deferral and variance account balances for Q4.

**Question:**

- a) Please update Tab 6, Carrying Charges, Cell C70 to 4.55%. Please include this update when GrandBridge is refiling the GBE(EPLUS)2025 Generic LRAMVA Workform as requested in question 3.

**Response:**

- a) GrandBridge Energy has updated Tab 6 (Carrying Charges) Cells 65 to 70 of the 2025 Generic LRAMVA Workform to reflect the 2023-Q3 to Q4- 2024 OEB-Approved Deferral and Variance Accounts Prescribed Interest Rate as posted on the OEB website: Prescribed interest rates | Ontario Energy Board (oeb.ca).

**Staff Question-5**

**Ref 1:** Section 4.3.7 (Lost Revenue Adjustment Mechanism Variance Account), page 39; 2024 LRAMVA Workform; IRM Rate Generator Model, Tab 19;

[Guidance on Prospective LRAM Amounts – 2024 Rates](#)

**Preamble:**

As per the Guidance on Prospective LRAM Amounts, distributors should propose rate riders to recover each annual LRAM-eligible amount in the corresponding rate year, beginning with the application for 2024 rates, and continuing each rate year until all amounts shown in Table 1- C of the LRAMVA Workform have been recovered.

**Question(s):**

- a) For the prospective disposition, please explain why GrandBridge has not proposed rate riders to recover the 2025 LRAM-eligible amount.
- b) If prospective disposition is being sought, please provide the calculation of the resulting rate riders for the EPLUS Rate Zone, including the inflation minus X-factor adjustment.
- c) Please input those riders into Tab 19 of the IRM Rate Generator Models for the EPLUS Rate Zone.

**Responses:**

- a) GrandBridge Energy has reviewed and updated the proposed rate riders to recover the 2025 LRAM-eligible amount on Tab 19 of the IRM Rate Generator Model.
- b) The following table provides the calculation of the rate riders for prospective disposition being sought.

Rate Class	2025 Total LRAM Eligible	2025 Inflation - X factor Adjustment	2025 LRAM Claim	Billing Determinant (kWh/KW)	Rate Rider
	A	B = A x (3.6% - 0.15%)	C = A + B	D	E = C / D
GS < 50 kW	\$198,440	\$6,846	\$205,286	212,588,411	\$0.0010
GS 50 - 999 kW	\$4,479	\$155	\$4,634	1,479,157	\$0.0031
GS 1000 - 4,999 kW	\$39,711	\$1,370	\$41,081	588,534	\$0.0698
Large Use	(\$888)	(\$31)	(\$919)	374,476	(\$0.0025)
Street Lighting	(\$167,334)	(\$5,773)	(\$173,107)	16,713	(\$10.3579)
	<b>\$74,408</b>	<b>\$2,567</b>	<b>\$76,976</b>		

- c) GrandBridge Energy has updated Tab 19 (Additional Rates) of the IRM Rate Generator Model.

**Staff Question-6**

**Ref 1:** Section 4.3.7.2 (Lost Revenue Adjustment Mechanism Variance Account), Page 38-39

**Preamble:**

GrandBridge notes that it is seeking recovery of lost revenues for persistence savings from CDM programs implemented in 2017 to 2022 and incremental savings and persistence savings from CDM programs implemented in 2023. GrandBridge notes that it has utilized the IESO's Process and Systems Upgrades Initiative (PSUI) Measurement and Verification Report to determine the incremental 2023 savings. For all claimed CDM savings, GrandBridge seeks approval of LRAM-eligible amounts through 2031.

**Questions:**

- a) Please confirm the source(s) of the persistence assumptions for programs implemented in 2017 to 2022. Did this source(s) provide complete information for GrandBridge to calculate persistence of savings from these programs through 2031, or did GrandBridge need to make any assumptions regarding persistence of these CDM savings? If the latter, please describe.
- b) Please file the noted PSUI Measurement and Verification Report.
- c) Does the PSUI Measurement and Verification Report provide any information regarding the expected persistence of savings from this project through 2031? If so, please describe.

**Response:**

- a) Please refer to column AR ("Notes & Assumptions") of file "GBE(EPLUS)\_2025 IRM\_LRAMVA\_Supplementary\_Data.XLSX" and the text below from GBE's 2024 IRM application (pages 38 and 39) for the sources and the assumptions for programs implemented in 2017 to 2022. The sources did not provide information through 2031; therefore, GrandBridge Energy extrapolated the program savings using a year-over-year change. The extrapolated values are highlighted in yellow in the above-referenced Excel file.

"GBE is seeking recovery of lost revenues in the GBE(BPI) Rate Zone resulting from the following:

- i. persistence savings from CDM programs implemented in 2016 to 2019;

- ii. incremental savings from CDM programs implemented in 2020 and their persistence in 2021; and
- iii. incremental savings from CDM programs implemented in 2021.

CDM program savings from 2016 to 2019 were previously approved by the OEB in the 2022 Cost of Service Application for the GBE(BPI) Rate Zone. The CDM program results for 2016 to 2017 were supported by the “2017 Final Verified Annual LDC CDM Program Results Report”<sup>8</sup> published by the IESO.

The CDM program results for 2018 to 2019 were supported by the “2019 Participation and Cost Report” published by the IESO and supplementary LRAMVA data for projects completed after April 15, 2019.<sup>9</sup>

CDM program savings from 2020 and 2021 are based on the most recent input assumptions through the use of post-project submissions to the IESO’s CDM portal for projects undertaken as part of the Conservation First Framework. GBE has determined the rate class allocations for actual CDM savings from 2020 to 2021 based on project specific information and the rate classes of the customers undertaking the project. The CDM program savings used in the calculation of LRAMVA balances are on a net basis. To determine the net project savings, GBE has applied the overall net-to-gross ratio from the provincial program results published in the IESO’s Evaluation, Measurement and Verification (“EM&V”) reports<sup>10</sup>.”

- b) Please refer to the file “PSUI M&V Report.pdf”.
- c) The PSUI M&V Report referenced in response b) above does not provide information regarding expected persistence savings. The persistence is based on the 2018 results for the process and systems upgrade program.

References:

8: EB-2021-0009: Brantford\_Att 4H 2017 CDM Program Results\_20210518

9: EB-2021-0009: Brantford\_Att 4I\_Apr 2019 Participation and Cost Report\_20210518 and Brantford\_Att\_4Gb\_Addl\_LRAMVA Data\_20210518

10: <https://www.ieso.ca/en/Sector-Participants/Energy-Efficiency/Evaluation-Measurement-and-Verification>

**Staff Question-7**

**Ref 1:** Section 4.3.7.2 (Lost Revenue Adjustment Mechanism Variance Account), Page 38, Table 27; 2024 LRAMVA Workform, Tab 1, Cell G31

**Preamble:**

The two sources indicate different values for the LRAMVA balance for the GS<50 rate class (\$377,004 and \$396,129, respectively).

**Questions:**

- a) Please reconcile the difference.
- b) If necessary, please update the resulting LRAMVA rate rider calculation.

**Response:**

- a) The different values resulted from figures from an earlier version of the LRAMVA model being input in the 2025 IRM Model. The value of \$396,129 in the LRAMVA model is correct.
- b) GrandBridge Energy has updated the rate rider calculation by revising Tab 3 (Continuity Schedule) and Tab 4 (Billing Det. for Def-Var) of the 2025 IRM Model to reflect the LRAMVA balance for the GS<50 rate class of \$396,129.



**Staff Question-8**

**Ref 1: Manager Summary, p 25-26; p 34, 43-44**

**Ref 2: GA Analysis Workform, EPLUS RZ**

GrandBridge Energy last received approval for disposition of Account 1588 and Account 1589's 2022 balances on an interim basis in the Energy Plus (GBE(E+)) Rate Zone and Accounts 1588 and 1589's 2022 balances on a final basis in the GBE(BPI) Rate Zone. GrandBridge Energy is proposing a principal adjustment to the E+ Rate Zone 2022 Account 1588 balance therefore the GA Workform has been prepared for 2022 and 2023 in the E+ Rate Zone.

In Section 5.1 of the Manager Summary, GrandBridge Energy discusses their investigation of the accuracy of the 2022 balances in Account 1588 and Account 1589, focusing on the impact of GrandBridge Energy's actual losses compared to its approved loss factor. The primary emphasis was on these accounts given that uplifted consumption is the primary billing determinant for both cost and revenue. Through this investigation, GrandBridge Energy completed an in depth review of its account balances, commodity analysis and impact of loss factors. The review identified an adjustment of \$260,913 required to complete a true-up of the Account 1588 balances that was not recorded at 2022 year-end. GrandBridge Energy has included the principal adjustment in the DVA Continuity Schedule and GA Workform for the GBE(E+) Rate Zone and has recorded the correcting entry in 2024.

OEB staff notes the corresponding entry in the GA Workform for the GBE(E+) Rate Zone in the amount of \$260,913 for Account 1588.

**Table 30 - Impact of Losses on Account 1588 RSVA - Power in 2022**

		2022		
		Total	less RPP	Non-RPP
<b>Power Cost</b>				
Wholesale consumption	(A)	1,719,683,755	(784,612,885)	935,070,870
Weighted Average Rate	(B)	0.0721	0.1013	0.0476
Total Power Cost	(C) = (A) x (B)	\$ 124,027,469	\$ (79,511,384)	\$ 44,516,085
<b>Power Revenue</b>				
<i>Metered Consumption</i>				
RPP		761,204,620	(761,204,620)	—
Non-RPP Class B		539,724,023	—	539,724,023
Non-RPP Class A		368,401,729	—	368,401,729
Total Metered Consumption	(D)	1,669,330,372	(761,204,620)	908,125,752
<i>Loss Uplift</i>				
RPP		23,408,265	(23,408,265)	—
Non-RPP Class B		15,297,858	—	15,297,858
Non-RPP Class A		7,754,465	—	7,754,465
Total Loss Uplift	(E)	46,460,588	(23,408,265)	23,052,323
Total Retail Consumption	(F) = (D) + (E)	1,715,790,960	(784,612,885)	931,178,075
Weighted Average Rate	(G)	0.0722	0.1013	0.0476
Total Power Revenue	(H) = (F) x (G)	\$ 123,820,508	\$ (79,511,384)	\$ 44,309,124
Account 1588 Balance	(I) = (C) - (H)	\$ 206,961	\$ —	\$ 206,961
<b>Billing Loss Uplift (Approved Loss Factor)</b>	(J) = (E) / (D)			<b>2.54%</b>
<b>Actual Loss Factor</b>	(H) = (D) / (A) - 1			<b>2.88%</b>
<b>Difference</b>	(I) = (J) - (H)			<b>(0.34)%</b>

**Table 31 - Impact of Losses on Account 1589 RSVA - Global Adjustment in 2022**

		<b>2022</b>
		<b>Non-RPP Class B</b>
<b>Global Adjustment Cost</b>		
Wholesale consumption	(A)	559,176,189
Weighted Average Rate	(B)	0.0523
Total Global Adjustment Cost	(C) = (A) x (B)	\$ 29,232,932
<b>Global Adjustment Revenue</b>		
Metered Consumption Non-RPP Class B	(D)	539,724,023
Loss Uplift	(E)	15,297,858
Total Retail Consumption	(F) = (D) + (E)	555,021,881
Weighted Average Rate	(G)	0.0534
Total Global Adjustment Revenue	(H) = (F) x (G)	\$ 29,634,322
Account 1589 Balance	(I) = (C) - (H)	\$ (401,391)
<b>Billing Loss Uplift (Approved Loss Factor)</b>	(J) = (E) / (D)	<b>2.83%</b>
<b>Actual Loss Factor</b>	(H) = 1 - (D) / (A)	<b>3.48%</b>
<b>Difference</b>	(I) = (J) - (H)	<b>(0.64)%</b>

On the GA 2023 Tab, the 2023 expected GA volume variance is calculated as:

<b>Weighted Average GA Actual Rate Paid (\$/kWh)**</b>	<b>Expected GA Volume Variance (\$)</b>
<b>R</b>	<b>P= Q*R</b>
0.01923	\$ 43,002

**Question(s):**

- a) Please describe how the weighted average rates (b) and (g) in Table 30 and 31 above were calculated and the basis of this information.
- b) Please confirm that Table 31 is to calculate the actual volume variance from the line losses. If so, please explain why the rate used in Table 31 and the resulting variance is significantly different than what was calculated on the GA 2023 Tab for expected GA volume variance.
- c) Please explain the relationship between the Account 1588 and 1589 balances noted in the tables and what is being requested for disposition.

**Responses:**

a) Table 30

The weighted average rate for Cost of Power (b) was calculated based on the total cost of power charged to GBE in 2022 divided by GBE's total wholesale consumption (kWh) in 2022.

The weighted average rate for Power Revenue (g) was calculated based on the total cost of power charged to customers in 2022 divided by the total retail consumption (kWh) across all customer classes, including loss uplift.

Table 31

The weighted average rate for Global Adjust Cost (b) was calculated based on the total Non-RPP Class B Global Adjustment charged to GBE in 2022 divided by GBE's Non-RPP Class B consumption used for RPP Settlement purposes in 2022.

The weighted average rate for Global Adjust Revenue (g) was calculated based on the total global adjustment charged to Non-RPP Class B customers in 2022 divided by the total retail Non-RPP Class B consumption (kWh), including loss uplift.

b) The Account 1589 balance of \$(401,391) in Table 31 represents the total variance in the analysis prepared, which includes the impacts from both rate and consumption.

The basis for the weighted average rates in Table 31 is outlined in the response to part a). These rates represent all consumption.

In the GA Workform, the rate used in the calculation of the expected GA volume variance is the weighted average pricing on the losses, which has different monthly consumption distribution compared to all consumption.

c) GrandBridge Energy is requesting the final disposition of 2022 balances in Account 1588 (principle of \$89,786). This amount includes the additional principal adjustment of \$260,931, as noted in Section 4.3.6.7.1 and Section 5.1 of the Application. The adjustment does not impact the balances in Account 1589.

GrandBridge Energy is also requesting final disposition of 2023 balances in Account 1589 of \$1.343 million. There are no additional principal adjustments related to Account 1589.

**Staff Question – 9**

**Ref 1: Manager Summary, p 34**

**Ref 2: GA Analysis Workform, GBE(E+) RZ**

**Ref 3: OEB Updated Accounting Guidance Illustrative Commodity Accounting Example June 12, 2024, tab Final RSVA balance**

In reference 1, OEB staff notes that Table 24 includes all the principal adjustments for the GBE(E+) Rate Zone. In the tab GA 2023 of the GA Analysis Workform for GBE(E+), OEB staff notes that a principal adjustment relating to the reversal of unbilled to actual revenue differences of (\$50,582) is missing on Tab GA 2023. OEB staff also notes other missing information, for example, the column for the principal adjustment on the DVA continuity schedule for all reconciling items listed in Note 5 are not filled by “Yes, or “No”.

In reference 2 of the GA Analysis Workform for GBE(E+), OEB staff notes that the correction related to line losses for 2022 is recorded in the principal adjustments tab in the amount of \$260,913 to Account 1588.

As shown in the OEB Accounting Guidance for Commodity Accounts Illustrative Example from the OEB Website, the impacts of line losses are already included in the general ledger when the distributor makes its journal entries for revenue and cost of power to Account 1588 and Account 1589. The variances resulting from the line losses are captured in the volume variances, which is illustrated in Table 40 and 41 of the Final RSVA balance tab, denoted as “UFE differences.”

**Question(s):**

- a) Please review the GA 2022 and GA 2023 tabs and ensure that the principal adjustments noted in the principal adjustments tab, including the missing adjustment noted in the preamble, are included in the table for Note 5.
- b) Please use the dropdown list in Note 5 to indicate whether the item is a principal adjustment or not and include explanations of items where needed.
- c) Please explain why the incremental line loss of \$260,913, which Grandbridge calculated as part of its investigation into line losses, is debited to Account 1588 when the line loss has already been accounted for in the volume variance entry.
  - i) Please confirm Grandbridge’s understanding of whether the line losses as newly investigated by Grandbridge for GBE(E+) impact Account 1588 and Account 1589, or only Account 1588.
- d) Please update and refile the GA Analysis workform and DVA continuity schedules.

**Responses:**

- a) GrandBridge Energy has reviewed the GA 2022 and GA 2023 tabs and ensured that the principal adjustments noted in the principal adjustments tab, including the missing adjustment noted in the preamble, are included in the table for Note 5.
- b) GrandBridge Energy has used the dropdown list in Note 5 to indicate whether the item is a principal adjustment or not and include explanations of items where needed.
- c) The principal adjustment of \$260,913 in Account 1588 is not attributable to line losses, despite the adjustment being identified during the detailed review of account balances as part of the line loss analysis. The adjustment is a correction to the 2022 year-end true-up of unbilled to actual differences related only to Account 1588.
- d) The GA Analysis Workform and DVA continuity schedules have been updated and refiled.