



**niagara peninsula energy inc.**

*Your Local Utility*

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December 2, 2024

Ms. Nancy Marconi  
Registrar  
Ontario Energy Board  
PO Box 2319  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

**RE: 2025 IRM Rate Application EB-2024-0043**

Dear Ms. Marconi:

Niagara Peninsula Energy Inc. ("NPEI") is in receipt of the Board's Draft Decision and Rate Order in respect of NPEI's 2025 IRM Rate Application (EB-2024-0043).

In accordance with the cover letter, NPEI has reviewed the Draft Decision and Rate Order and has identified one item to bring to the Board's attention, which relates to the Draft Tariff of Rates and Charges for the Embedded Distributor Rate Class.

NPEI suggests adding the specific installations of the Embedded Distributor Rate Class to the descriptions of the Deferral and Variance Account rate riders and Capacity Based Recovery ("CBR") Rate Riders as follows:

Rate Rider for Disposition of Deferral/Variance Accounts (2025) - effective until December 31, 2025 - Applicable only for Victoria and Rockway installations of the embedded distributor	\$/kW	0.9739
Rate Rider for Disposition of Capacity Based Recovery Account (2025) - effective until December 31, 2025 - Applicable only for Class B Customers - Applicable only for Victoria and Rockway installations of the embedded distributor	\$/kW	0.0778
Rate Rider for Disposition of Deferral/Variance Accounts (2025) - effective until December 31, 2025 - Applicable only for Wellandport and Port Davidson installations of the embedded distributor	\$/kWh	(0.0013)
Rate Rider for Disposition of Capacity Based Recovery Account (2025) - effective until December 31, 2025 - Applicable only for Class B Customers - Applicable only for Wellandport and Port Davidson installations of the embedded distributor	\$/kWh	0.0002

NPEI notes that the specific installations of the Embedded Distributor Rate Class were included in the descriptions of the Deferral and Variance Account rate riders and CBR rate riders in the Board-approved Tariff of Rates and Charges in NPEI's 2024 IRM Rate Application (EB-2023-0040), issued December 14, 2023. For reference, NPEI has attached the Embedded Distributor section of its 2024 Tariff of Rates and Charges as Attachment A to this letter.



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NPEI has not identified any other concerns with the Draft Decision and Rate Order or the 2025 IRM Rate Generator Model.

Yours truly,  
NIAGARA PENINSULA ENERGY INC.

A handwritten signature in black ink, appearing to read 'Paul Blythin', is written over a light blue horizontal line.

Paul Blythin  
VP Regulatory Affairs & Revenue

Cc: Suzanne Wilson, Chief Operating Officer, NPEI  
Harshleen Kaur, Case Manager, OEB

## Attachment A

Embedded Distributor section of  
NPEI's Board-Approved 2024 Tariff of Rates and Charges  
(EB-2023-0040)

**Niagara Peninsula Energy Inc.**  
**TARIFF OF RATES AND CHARGES**  
**Effective and Implementation Date January 1, 2024**  
**This schedule supersedes and replaces all previously**  
**approved schedules of Rates, Charges and Loss Factors**

EB-2023-0040

## **EMBEDDED DISTRIBUTOR SERVICE CLASSIFICATION**

This classification applies to an electricity distributor licensed by the Ontario Energy Board that is provided electricity by means of this distributor's facilities. Further servicing details are available in the distributor's Conditions of Service.

### **APPLICATION**

The application of these rates and charges shall be in accordance with the Licence of the Distributor and any Code or Order of the Ontario Energy Board, and amendments thereto as approved by the Ontario Energy Board, which may be applicable to the administration of this schedule.

No rates and charges for the distribution of electricity and charges to meet the costs of any work or service done or furnished for the purpose of the distribution of electricity shall be made except as permitted by this schedule, unless required by the Distributor's Licence or a Code or Order of the Ontario Energy Board, and amendments thereto as approved by the Ontario Energy Board, or as specified herein.

Unless specifically noted, this schedule does not contain any charges for the electricity commodity, be it under the Regulated Price Plan, a contract with a retailer or the wholesale market price, as applicable. In addition, the charges in the MONTHLY RATES AND CHARGES - Regulatory Component of this schedule do not apply to a customer that is an embedded wholesale market participant.

If included in the following listing of monthly rates and charges, the rate rider for the disposition of WMS - Sub-account CBR Class B is not applicable to wholesale market participants (WMP), customers that transitioned between Class A and Class B during the variance account accumulation period, or to customers that were in Class A for the entire period. Customers who transitioned are to be charged or refunded their share of the variance disposed through customer specific billing adjustments. This rate rider is to be consistently applied for the entire period to the sunset date of the rate rider. In addition, this rate rider is applicable to all new Class B customers.

If included in the following listing of monthly rates and charges, the rate rider for the disposition of Global Adjustment is only applicable to non-RPP Class B customers. It is not applicable to WMP, customers that transitioned between Class A and Class B during the variance account accumulation period, or to customers that were in Class A for the entire period. Customers who transitioned are to be charged or refunded their share of the variance disposed through customer specific billing adjustments. This rate rider is to be consistently applied for the entire period to the sunset date of the rate rider. In addition, this rate rider is applicable to all new non-RPP Class B customers.

It should be noted that this schedule does not list any charges, assessments or credits that are required by law to be invoiced by a distributor and that are not subject to Ontario Energy Board approval, such as the Global Adjustment and the HST.

**Niagara Peninsula Energy Inc.**  
**TARIFF OF RATES AND CHARGES**  
**Effective and Implementation Date January 1, 2024**  
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EB-2023-0040

**MONTHLY RATES AND CHARGES - Delivery Component**

Service Charge	\$	157.52
Rate Rider for Disposition of Account 1509 (2024) - effective until December 31, 2024	\$	(0.13)
Distribution Volumetric Rate - Applicable only for Victoria and Rockway installations of the embedded distributor	\$/kW	3.0860
Low Voltage Service Rate - Applicable only for Victoria and Rockway installations of the embedded distributor	\$/kW	0.5305
Rate Rider for Disposition of Global Adjustment Account (2024) - effective until December 31, 2024 Applicable only for Non-RPP Customers	\$/kWh	0.0002
Rate Rider for Disposition of Deferral/Variance Accounts (2024) - effective until December 31, 2024 - Applicable only for Victoria and Rockway installations of the embedded distributor	\$/kW	1.8370
Rate Rider for Disposition of Capacity Based Recovery Account (2024) - effective until December 31,2024 Applicable only for Class B Customer - Applicable only for Victoria and Rockway installations of the embedded distributor	\$/kW	(0.0522)
Rate Rider for Disposition of Deferral/Variance Accounts (2024) - effective until December 31, 2024 - Applicable only for Wellandport and Port Davidson installations of the embedded distributor	\$/kWh	0.0025
Rate Rider for Disposition of Capacity Based Recovery Account (2024) - effective until December 31,2024 Applicable only for Class B Customers - Applicable only for Wellandport and Port Davidson installations of the embedded distributor	\$/kWh	(0.0001)
Retail Transmission Rate - Network Service Rate - Applicable only for Victoria and Rockway installations of the embedded distributor	\$/kW	3.9859
Retail Transmission Rate - Line and Transformation Connection Service Rate - Applicable only for Victoria and Rockway installations of the embedded distributor	\$/kW	2.2926

**MONTHLY RATES AND CHARGES - Regulatory Component**

Wholesale Market Service Rate (WMS) - not including CBR	\$/kWh	0.0041
Capacity Based Recovery (CBR) - Applicable for Class B Customers	\$/kWh	0.0004
Rural or Remote Electricity Rate Protection Charge (RRRP)	\$/kWh	0.0014
Standard Supply Service - Administrative Charge (if applicable)	\$	0.25