



PUBLIC INTEREST ADVOCACY CENTRE  
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

December 4, 2024

VIA E-MAIL

Ms. Nancy Marconi  
Registrar  
Ontario Energy Board  
Toronto, ON

Dear Ms. Marconi:

**Re: ERTH Power Corporation-ICM Request**  
**Ontario Energy Board File No.: EB-2024-0021**

Attached please find VECC's interrogatories in the above proceeding.

The Notice of a Rate Hearing for this Application includes bill increases for typical Residential and GS<50 kW customers as follows:

Rate Class	Main Rate Zone	Goderich Rate Zone
Residential (750 kWh)	\$1.20 per month	\$1.27 per month
General Service less than 50kW (2,000 kWh)	\$1.86 per month	\$2.03 per month

The Notice mentions that ERTH Power has requested incremental capital funding for the purchase of property, design, construction, and furnishing of a new administrative and operational facility, however, the bill increases in the above table above do not include the impact of this new facility. When the incremental impact of the new facility is included, the bill increase for residential customers is an additional \$6.44 for the Main Rate Zone and \$6.64 for the Goderich Rate Zone<sup>1</sup>. VECC is concerned that customers have not been publicly advised of the impact of ERTH Power's proposal to construct this new \$50,625 ft<sup>2</sup> facility with a forecast cost of \$33.438 million. In VECC's view, given the significance and magnitude of the project, and resulting bill impacts, the OEB should consider providing additional procedural steps to allow further opportunities for discovery on the project including a Technical Conference.

Yours truly,

Consultant for VECC

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<sup>1</sup> Appendix A p. 45