

December 17, 2024

BY RESS and EMAIL

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor, P.O. Box 2319
Toronto, ON M4P 1E4
Email: registrar@oeb.ca

Dear Ms. Marconi;

RE: APPLICATION BY ALECTRA UTILITIES CORPORATION FOR DISTRIBUTION RATES EFFECTIVE JANUARY 1, 2025 (EB-2024-0006)

On August 15, 2024, Alectra Utilities filed an application with the Ontario Energy Board (“OEB”) under Section 78 of the *Ontario Energy Board Act, 1998* as amended and pursuant to the OEB’s *Filing Requirements for Incentive Rate-setting Applications* seeking approval for electricity distribution rates, and other charges, effective January 1, 2025. The OEB assigned File Number EB-2024-0006 to the Application.

The OEB issued a Decision and Rate Order on this matter on December 12, 2024. The Board directed Alectra Utilities to review the Tariff of Rates and Charges and advise the OEB of its completeness and accuracy or provide a detailed explanation of any inaccuracies or missing information, by December 19, 2024.

Alectra Utilities herein provides comments related to certain items contained in the Decision, below:

1. Tariff of Rates and Charges – Rate Accuracy, Rate Description and Formatting

Alectra Utilities has reviewed the Tariff of Rates and Charges set out in Schedule A and observes the following issues in the rates, rate descriptions and formatting:

Enersource RZ

1. Residential - *Rate Rider for Recovery of Incremental Capital (2017) - in effect until the effective date of the next cost of service based rate order*: it is currently \$0.6, but it should be \$0.60.
2. General Service Less than 50 kW - *Rate Rider for Recovery of Incremental Capital (2017) - in effect until the effective date of the next cost of service based rate order*: it is currently \$1.1, but it should be \$1.10.

3. General Service 500 to 4,999 kW - *Rate Rider for Recovery of Incremental Capital (2017)* - *in effect until the effective date of the next cost of service based rate order*: it is currently \$44, but it should be \$44.00.
4. Large Use - *Rate Rider for Recovery of Incremental Capital (2017)* - *in effect until the effective date of the next cost of service based rate order*: it is currently \$346.9, but it should be \$346.90.
5. Street Lighting - *Rate Rider for Recovery of Incremental Capital (2018)* - *in effect until the effective date of the next cost of service based rate order*: it is currently \$0.077, but it should be \$0.0770.
6. **Standby Charge - General Service 500 to 4,999: it is currently \$2.8390, but it should be \$2.8930.**
7. Total Loss Factor - Secondary Metered Customer < 5,000 kW: it is 1.036, but it should be 1.0360.

Guelph RZ

1. Transformer Allowance for Ownership by General Service 50 to 999 kW customers - per kW of billing demand/month: rate description, unit, and rate should appear on the same line.

Horizon RZ

1. Street Lighting - *Low Voltage Service Rate*: it is currently \$0.0367, but it should be \$0.03670.

PowerStream RZ

1. Large Use - *Rate Rider for Recovery of Incremental Capital (2018)* - *in effect until the effective date of the next cost of service based rate order*: it is currently \$0.009, but it should be \$0.0090.
2. Standby Charge: rate description, unit, and rate should appear on the same line.
3. Sentinel Lighting:
 - *Low Voltage Service Rate*: it is currently \$0.159, but it should be \$0.1590.

- **Retail Transmission Rate - Network Service Rate:** it is currently **\$3.5598**, but it should be **\$3.5553**.
4. **Street Lighting - Retail Transmission Rate - Network Service Rate:** it is currently **\$4.6066**, but it should be **\$4.6007**.

2. Rate Generator Model Correction

Alectra Utilities has reviewed the Rate Generator Models ("RGM") and observes the following issues in the RGM:

All Rate Zones:

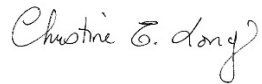
Rural and Remote Rate Protection (RRRP): The 2024 rate in Tab 21: Bill Impacts for all classes is currently **\$0.0015**, but it should be **\$0.0014**.

Enersource RZ

Standby Charge – General Service 500 to 4,999: it is currently **\$2.8390**, but it should be **\$2.8930**.

Should you have any questions or require additional information, please do not hesitate to contact me.

Yours truly,



Christine E. Long
Vice President, Regulatory Affairs and Privacy Officer
Christine.long@alectrautilities.com

cc: Charles Keizer, Torys LLP