Ontario Energy Board | Commission de l'énergie de l'Ontario

EB-2024-0030

Hydro 2000 Inc.

Application for electricity distribution rates effective May 1, 2025

Decision on Issues List
January 15, 2025

Hydro 2000 Inc. (Hydro 2000) filed a cost of service application with the Ontario Energy Board (OEB) on October 15, 2024, under section 78 of the *Ontario Energy Board Act, 1998*, seeking approval for changes to the rates that Hydro 2000 charges for electricity distribution, beginning May 1, 2025 (Application). The Application was accepted by the OEB as complete on October 29, 2024, and a Notice of Hearing was issued on November 7, 2024.

On November 29, 2024, the OEB issued Procedural Order No. 1 which approved the Vulnerable Energy Consumers Coalition (VECC) as intervenors in this proceeding. Procedural Order No. 1 made provision for parties to recommend any revisions to the standard Issues List for electricity distribution rate applications for the OEB's consideration.

Hydro 2000 requested that the OEB use this Application to pilot a new streamlined process for very small utilities. As a result, the OEB made provision for a one-day Issues Meeting on January 8, 2025, where Hydro 2000, VECC, and OEB staff discussed the Application; sought agreement on an Issues List that sets out issues that are relevant to the Application; and identified which issues, if any, require further discovery through interrogatories.

On behalf of all parties to the January 8th Issues Meeting, OEB staff filed a proposed Issues List (attached as Schedule A), a list of clarifications, updates and corrections Hydro 2000 agreed to make to its evidence (attached as Schedule B).

Findings

The OEB approves the proposed Issues List for the purposes of this proceeding and accepts the proposal to forgo interrogatories. The OEB commends the parties participating in this streamlined pilot for successfully eliminating the need for interrogatories from the process. Additionally, the OEB appreciates the inclusion of Schedule B in the OEB staff letter, outlining clarifications, updates and corrections to be made by Hydro 2000 to the evidence. These Schedules not only replace the need for written interrogatories and responses but also provide a clear framework for the updates that Hydro 2000 will make to the evidence, enhancing communication throughout this pilot process.

The OEB may update the Issues List as necessary to further define the scope of the proceeding.

THE ONTARIO ENERGY BOARD ORDERS THAT:

1. The approved Issues List is attached as Schedule A.

2. Hydro 2000 shall file those clarifications, updates and corrections to its evidence, attached as Schedule B, with the OEB and deliver them to all parties by **February 4, 2025**.

DATED at Toronto, **January 15, 2025**

ONTARIO ENERGY BOARD

Nancy Marconi

Digitally signed by Nancy Marconi
Date: 2025.01.15 13:30:56 -05'00'

Nancy Marconi
Registrar

SCHEDULE A

APPROVED ISSUES LIST

HYDRO 2000 INC.

EB-2024-0030

APPROVED ISSUES LIST

EB-2024-0030

HYDRO 2000 INC.

1. Capital Spending and Rate Base

1.1 Are the proposed capital expenditures and in-service additions appropriate?
1.2 Are the proposed rate base and depreciation amounts appropriate?

2. OM&A

2.1 Are the proposed OM&A expenditures appropriate?
2.2 Is the proposed shared services cost allocation methodology and the quantum appropriate?

3. Cost of Capital, PILs, and Revenue Requirement

3.1 Is the proposed cost of capital (interest on debt, return on equity) and capital structure appropriate?
3.2 Is the proposed PILs (or Tax) amount appropriate?
3.3 Is the proposed Other Revenue forecast appropriate?
3.4 Have all impacts of any changes in accounting standards, policies, estimates and adjustments been properly identified and recorded, and is the rate-making treatment of each of these impacts appropriate?
3.5 Is the proposed calculation of the Revenue Requirement appropriate?

4. Load Forecast

4.1 Is the proposed load forecast methodologies and the resulting load forecasts appropriate?

5. Cost Allocation, Rate Design, and Other Charges

5.1 Are the proposed cost allocation methodology, allocations, and revenue-to-cost ratios, appropriate?
5.2 Is the proposed rate design, including fixed/variable splits, appropriate?
5.3 Are the proposed Retail Transmission Service rates and Low Voltage rates appropriate?
5.4 Are the proposed loss factors appropriate?
5.5 Are the Specific Service Charges and Retail Service Charges appropriate?
5.6 Are rate mitigation proposals required and appropriate?

6. Deferral and Variance Accounts

6.1 Are the proposals for deferral and variance accounts, including the balances in the existing accounts and their disposition, requests for new accounts, requests for discontinuation of accounts, and the continuation of existing accounts, appropriate?

7. Other

7.1 Is the proposed effective date appropriate?

7.2 Has the applicant responded appropriately to all relevant OEB directions from previous proceedings?

SCHEDULE B

HYDRO 2000 INC.

EB-2024-0030

CLARIFICATIONS, UPDATES, AND CORRECTIONS

Hydro 2000 - Commitments to Provide Information

Hydro 2000 2025 Cost of Service (EB-2024-0030)

INFORMATION COMMITMENTS

General

Q 1. Hydro 2000 will provide updated Chapter 2 appendices AA, AB, BA, JA, JD, 2-H and 2-K to reflect 2024 actuals to the extent the actuals are available. The parties recognize that actuals may not be available in time to meet the February 4, 2025 deadline for filing commitment responses; accordingly if delaying the response to this and other questions seeking 2024 actual numbers beyond February 4, 2025 will allow Hydro 2000 enough time to provide those actual results prior to the Settlement Conference scheduled for February 13, 2025 then the Parties support delaying the provision of such responses to as late as February 12, 2025 in order to provide Hydro 2000 with the time to provide those actual 2024 numbers.

Capital Spending and Rate Base

Q 2. In error checking Hydro 2000 stated that the following tables were updated, but the newly filed documents did not include updates; please provide the properly updated file.

Exhibit 2, DSP, Table 3, p.18 (66 of pdf)	The line states that H2000 has 15 single phase and 1 three phase pad-mounted tx The table showing tx data only shows 11 tx	The Table at page 66 has been corrected.
Exhibit 2, DSP, Table 3, p.21 (69 of pdf)	The line states that H2000 has 709 poles across its service area. The table shows that there are 419 poles.	The Table at page 69 has been corrected.

Q 3. Please describe how Hydro 2000 records and tracks pole inspection & testing results. Please provide a copy of any such records. Please provide similar information for transformers and pad mounted switch gear.

Q 4. Please explain the pattern of meter costs from 2020 to 2025 and then during the IRM period from 2026 to 2029.

Q 5. Please explain the atypical, capitalized computer software costs in 2024 and 2025 of $5,060 and $5,500 respectively, relative to other years. (Appendix 2A, line 51).

OM&A

Q 6. Please explain the basis for the 6.9% increase to administrative salaries in 2024 (exhibit 4, page 16).

Q 7. In 2025, there is an $8400 salary annual increment, reflecting both routine and annual increase and adjustments to the salary scale. Please explain the basis for this. Hydro 2000 states that typically the utility uses the Bank of Canada Consumer price index October Total CPI for salary increases. Please provide the latest forecast applied to 2025 salary increase.

Q 8. At the chapter 2 appendices, tab 2-K, the total compensation breakdown by OM&A and capital seems to be incorrect. Please update if necessary.

Q 9. Hydro 2000 has used a 4.8% inflation to prepare its OM&A costs for 2025. Please provide revised forecasts with an updated inflation factor for 2025 of 3.6% and 2.5% respectively, identifying those aspects of the forecast that relied on the inflation factor.

Q 10. Please update the cost of service costs for this proceeding to reflect a single intervenor with costs for that intervention capped at $20,000.

Q 11. Please provide Hydro 2000's actual cost of service costs to date.

Q 12. Please update Hydro 2000's OEB assessment costs to reflect actuals to 2024 and an updated forecast for 2025.

Q 13. Please summarize how Hydro 2000's cost of service costs for its previous cost of service and its 2025 cost of service have been included in Hydro 2000's OM&A spending evidence.

Q 14. Between 2020-2025, year over year OM&A increases have been between 5-6% except for 2022 where OM&A increased by 11% (or 57k) higher than 2021. From the evidence, it seems that almost half (22k) of this increase in 2022 was due to Ministry of the Environment's order to demolish the transformer storage shed and perform testing on transformers for PCB contamination in preparation for compliance with R.R.O. 1990, Reg. 362: Waste Management – PCBs. The remaining was related to 9.5k in annual fees for the Honeywell meter software fees and 9k in bad expenses attributed to covid. Please explain why costs did not normalize in 2023 after these increases.

Q 15. At Exhibit 4, page 11, table 3, customer focus costs are described as including, customer service costs, mailing costs, billing and collection costs and bad debt costs; please break out the customer focus costs into those four categories over the 2020 to 2025 period, updating the actuals and forecast as necessary. Please explain the basis for the 2025 forecast bad debt expense.

Q 16. Please provide the Activity and Program Benchmarking results in the form of unit costs instead of total costs in Exhibit 1.5.2 Activity & Performance-Based Benchmarking, as specified in the filing requirements.

Q 17. Lines O&M costs reported in Table 11 Exhibit 1 do not align with the RRR submission to the OEB. Please provide revisions or explanations.

Q 18. In 2024, there is an increase in Billing and Collecting costs due to the software amendments required to accommodate the Customers Choice options, OESP System Enhancement, Green Button and SilverBlaze platforms. In 2025, Hydro 2000 states that Billing and Collecting costs are projected to increase by $15,834, due to the additional expenses associated with maintaining various software systems necessary to comply with new regulatory requirements. A significant factor is the annual maintenance cost for Silverblaze, which stands at $18,138. Please provide further explanation for the driver behind the increase in Billing and Collecting costs of $15,834 from 2024 to 2025, including specifically any additional regulatory requirements in 2025.

Q 19. At Exhibit 4, page 38**,** table 19, Hydro 2000 summarizes actual benefit expenses. Please provide the actual benefit expenses for 2024 and forecast benefit expense for 2025. Please also use this updated information to update Appendix 2-K Employee Compensation Costs as necessary.

Cost of Capital, PILs, and Revenue Requirement

Q 20. Hydro 2000 has provided explanations of the variations in the ROE for 2022 and 2023.

a) Please explain variation in the ROE from the deemed rate for 2021 (-8.42%);

b) Please provide the forecasted ROE for 2024 and the rationale for any deviations from the OEB's deemed rate if applicable; and

Please explain how Hydro 2000 can operate with very little or no debt financing, particularly given the underearning relative to its deemed ROE in recent years.

Q 21. Hydro 2000 has indicated that it has obtained new long-term debt not described in its evidence in the amount of $250,000 at a rate of 5.88% for a 5-year term, amortized over 5 years. Please provide an update to the cost of capital evidence, as necessary, to reflect the new debt instrument and explain any due diligence that Hydro 2000 undertook in obtaining that debt.

Q 22. Hydro 2000 doesn't use the latest PILs model in this application. Please file an updated PILs model using [the latest PILs model dated May 2, 2024] and update the following schedules in particular:

a) In the PILs model, the CCA amount shows on B1 Sch 1 ($0) is different from the amount shows on B8 Sch 8 ($71,339). This error is due to the incorrect PILs model used in the application.

b) The beginning UCC balance in 2025 test year "T8 Sch 8" does not match the ending UCC balance in 2024 bridge year "B8 Sch 8". The beginning UCC of 2025 is $63,308 while the ending UCC of 2024 is $911,877. This error is due to the incorrect PILs model used in the application.

Q 23. Re: Accelerated CCA:

a) Please confirm that the AIIP has been claimed in Hydro 2000's tax filings for the period 2020 to 2023.

b) Please confirm Hydro 2000 has applied the legacy half-year rule and normal CCA rates on the capital additions in the 2024 bridge Year and 2025 test Year instead of applying the CCA rates using the AIIP. Please also confirm in written that Hydro 2000 would not apply the AIIP in its 2024 and 2025 tax filings.

c) If a) and b) above are confirmed, please explain why Hydro 2000 elects not to claim the CCAs using the AIIP for the bridge year and test year. Please also confirm that Hydro 2000 will not claim the CCAs under the AIIP going forward in future tax filings (2024 to 2027 tax filings).

d) In DVA Continuity (Tab 2b and Appendix A), Account 1592 – PILs and Tax Variance for 2006 and Subsequent Years shows there is $28,288 variance between the RRR reporting balance and the DVA continuity schedule. Hydro 2000 states this variance is due to calculation of the effects of the Accelerated CCA impact. However, there is no balance recorded in Account 1592 sub-account CCA changes.

   i) Please confirm whether this variance is related to Account 1592 sub-account CCA changes.

ii) If confirmed, please provide Account 1592_Accelerated _CCA schedule and reconcile to the variance above.

Q 24. Please confirm that the balances recorded in Account 4405 - Interest and Dividend Income for 2025 do not include interest associated with DVAs.

Q 25. Please confirm that Hydro 2000 will update and record MicroFit-related revenues under Account 4235 instead of 4080. Please also update the MicroFit rate to $5.00 according to the OEB's letter "Review of Fixed Monthly Charge of microFIT Generator Service Classification" on November 19, 2024.

Q 26. Please provide account breakdown details for "Other Operating Revenue" and "Other Income and Deductions". This is required in the footnote to Chapter 2 Appendix-H, under Account Breakdown Details.

Q 27. With respect to Account 4210, please confirm that the account only includes pole rental income, and please provide a calculation of the pole rental income for each of the years 2023, 2024 and 2025 showing the number of poles in each year, the rate used in each year, and the resulting revenue in each year, reconciled to the total revenue reported in Account 4210.

Q 28. At Exhibit 6, page 17 Hydro 2000 notes that it used an inflation factor of 3.6% when forecasting other revenue for 2024 and 2025. Please provide details showing how the 3.6% inflation factor was used to forecast other revenues for 2024 and 2025, including identifying the specific categories of other revenue where the inflation factor of 3.6% was used.

Load Forecast

Q 29. Please provide, if available:

a) 2024 actual customer counts, and
b) 2024 actual wholesale purchases and retail consumption data.
Assuming the requested information is available, please provide an updated load forecast using the requested 2024 actual data.

Q 30. Hydro 2000 confirmed that it did not test a COVID variable as part of its load forecast. Please provide a load forecast that uses a COVID variable.

Q 31. Please provide a load forecast that removes the customer count variable.

Q 32. In Load forecast excel file, Tab forecast: HDD and CDD are based on a 9-year average. 2014 has not been included. Please update to include a 10-year average.

Cost Allocation, Rate Design, and Other Charges

Q 33. Hydro 2000 describes at Exhibit 7, table 8, page 7 its billing and collecting weighting factors. In that evidence there are several line items within account 5315 that appear to be allocated only to residential and GS<50 customers. Please describe the activities that those line items that are only allocated to residential and GS<50 customers represent. Please explain whether there are similar activities undertaken in relation to the other rate classes and, if so, identify where the costs of those activities are tracked and allocated to those other rate classes.

Q 34. Please confirm whether any revisions to the cost allocation model are necessary and, if so, update the cost allocation model accordingly, in relation the following identified issues:

a) At tab 6.2 it appears that it is assumed that all GS>50 customers use Hydro 2000's line transformers and secondary assets, while at tab I8 it appears that at least some GS>50 customers own their own line transformers and secondary assets;

b) At tab 6.2, E2 and E3 it appears that streetlighting customers use no primary assets or line transformers; and

c) At tab 6.2 the number of street light devices appears to be zero.

Q 35. It appears that the proposed fixed/variable splits shown at Exhibit 8, page 5, table 4 conflict with the narrative explanation as to how Hydro 2000 arrived at its proposed fixed/variable splits. Please provide an updated proposal for fixed and variable splits based on all the relevant evidence updates to date and explain the rationale for the proposed fixed/variable split in each case.

Q 36. Please update the proposed 2025 low voltage expense, accounting for the new expense amount per the OEB's decision in EB-2024-0032 in relation to Hydro One's low voltage costs and 2024 billing determinants if available.

Q 37. Please confirm that the loss factor calculation at Exhibit 8 accounts for embedded generation in columns A1 and A2.

Q 38. Please confirm that in the RTSR Workform the RRR data used in Tab 3 and the billing data used in Tab 5 are both based on the same year.

Q 39. Please update RTSRs with the 2025 final HONI rates issued on December 19, 2024, in EB-2024-0032.

Q 40. Please describe any options that have been considered to address the large bill impact in the street lighting rate class. Please confirm whether street lighting customers have been engaged to determine their reaction to the proposed larger than 10% rate increase.

Q 41. In the RTSR model, LV Rate tab, it appears the volumes for USL and Street Lighting have been reversed. (Cell D42 and D43). Please correct.

Q 42. As part of its 2020 cost of service Settlement proposal, Hydro 2000 committed to continue exploring possible solutions to lowering its line losses. Please elaborate with respect to any steps that have been taken to address line losses.

Deferral and Variance Accounts

Q 43. OEB staff has complied the following table which shows there are $39,098 difference of Other regulatory assets between the amount showing on 2023 F/S Notes 7 and 2.1.7 on the DVA Continuity. Please explain this variance and update the evidence as applicable.

	LV Variance	**Other regulatory assets***	**PILs**	**Amounts recoverable from clients****	**RSVA**	**Total**
2023 Financial Statements *(Notes 7)*	82,691	76,747	28,288	92,225	53,664	333,615
2.1.7 RRR *(DVA Cont, Tab 2a, 2b)*	82,691	37,649	28,288	92,225	53,664	294,516
Difference	0	39,099	0	0	0	39,099

*Other regulatory assets: Smart Metering Entity Charge Variance Account (Group 1), All of Group 2 accounts (except Account 1592 PILs and Tax Variance for 2006 and Subsequent Years).

**Amount recoverable from clients: all the Account 1595 Sub accounts in Tab 2a

Q 44. Re: Pole Attachment Revenue Variance Account:

a) The following table shows Table 4 in Ex 9 does not match the DVA Continuity. Specifically, as of December 2023, there is $11,393 principal difference and $573 interest difference between Exhibit 9 and DVA continuity.

	EX9-Table 4		DVA Continuity Tab 2b		Difference	
	Principal	**Interest**	**Principal**	**Interest**	**Principal**	**Interest**
	a	**b**	**c**	**d**	**a-c**	**b-d**
2022 Activity	3402.45	(54.00)	(3402.45)	(54.00)		
2022 End Bal	**(1581.46)**	**(112.95)**	**(8415.88)**	**(112.92)**	**6834.42**	**(0.03)**
2023 Activity	2279.30	(25.99)	(2279.30)	(563.04)		
2023 End Bal	**697.84**	**(138.94)**	**(10695.18)**	**(675.96)**	**11393.02**	**537.02**

b) Please update Table 4, using the following format per Chapter 2 filing requirements.

Year	H2000 2020 COS $	Actual Charge	Incremental Charge	# of Poles	Incremental Revenue	Carrying Charges	Total
2019							
2020							
2021							
2022							
2023							
2024 Forecast							
Jan to Apr 2025 Forecast							
Total as of Apr 30, 2025							

c) Please reconcile Table 4 above with the DVA continuity.

d) In DVA continuity Appendix A, Hydro 2000 states that the variance of ($6,205) is due to pole revenues are calculated up to end of 2025 as required. Please forecast the revenue and interest up to April 30, 2025 as indicated in the table above given that the effective date of the new rate will start from May 1, 2025.

e) The total claim incl interest of pole attachment in Table 3 of Exhibit 9 shows a debit amount of $2,256 while the DVA continuity shows a credit amount of $12,100. Please confirm the correct amount of pole attachment Hydro 2000 is seeking for disposition in this proceeding and update the evidence accordingly.

f) Please provide the working excel worksheet entitled B-2024-0030-1508 Pole Attachement.xls as mentioned in Exhibit 9.

Q 45. Re: DVA Continuity
Ref 1: 2020 DVA_Continuity_Schedule_Settlement 20200804, Tab 2a & 2b
Ref 2: Dec_order_Hydro 2000_20200924, section 4.2, Table 21, p.50
Ref 3: DVA Continuity_20241126, Tab 2b

Preamble:
Per Ref 1 and Ref 2, OEB staff has compiled the following table showing the DVA balances for disposition:

Account Name	Account Number	Principal	Carrying Charge	Total Claim	Reference
LV Variance Account	1550	55,269	765	56,034	Ref 2
Smart Meter Entity Variance Charge	1551	508	15	523	Ref 2
RSVA - Wholesale Market Service Charge	1580	554	(56)	498	Ref 2
RSVA - Retail Transmission Network Charge	1584	9,749	173	9,922	Ref 2
RSVA - Retail Transmission Connection Charge	1586	8,717	122	8,839	Ref 2
Total Group 1		**74,797**	**1,019**	**75,815**	Ref 3
Other Regulatory Assets - Sub-Account - Deferred IFRS Transition Costs	1508	45,015	3,854	48,869	Ref 2
Pole Attachment Revenue Variance	1508	(631)	(21)	(652)	Ref 2
Total for Group 2 accounts		**44,384**	**3,833**	**48,217**	Ref 3
LRAMVA	1568	1,674	20,841	22,515	Ref 2
Accounting Changes Under CGAAP Balance + Return Component	1576	(28,538)	0	(28,538)	Ref 2
Total approved disposition during 2020		**92,317**	**25,693**	**118,010**	

a) In DVA continuity, Hydro 2000 transferred $111,486 principal amount (OEB approved $92,317) and $6,526 interest amount (OEB approved $25,693) to Account 1595-sub account 2020. Please explain the variance between the amount transferred to Account 1595-sub account 2020 in DVA continuity and the OEB approved amount per the table above.

b) Please explain why Hydro 2000 does not indicate the OEB approved disposition in the DVA continuity (Tab 2b) based on the table above for both principal and interest amount of Account 1568-LRAM and Account 1576-Accounting Changes Under CGAAP Balance + Return Component.

c) Per Ref 1 and Ref 3, OEB staff has compiled the following table. Please explain why the beginning balances of both Account 1568-LRAM and Account 1576-Accounting Changes Under CGAAP Balance + Return Component do not match the ending balance of the last COS proceeding.

	2018 Ending (Ref 1)		**2018 Ending (DVA Continuity)**	
	principal	**interest**	**principal**	**interest**
Account 1568-LRAM	1,674	20,841	0	0
Account 1576-Accounting Changes Under CGAAP Balance + Return Component	(28,538)	0	(19,504)	0

d) Please update and resubmit the DVA continuity based on the findings above.

Q 46. Hydro 2000 uses OEB prescribed interest rates up to Q3 2024 in DVA Continuity Schedule (column BQ in both Tab 2a and 2b). Please update the applicable schedules using the OEB prescribed Q4 2024 rates.

Q 47. In DVA Continuity (Tab 7), Hydro 2000 indicates the rate rider recovery period is 24 months. In Exhibit 9 (section 9.2.5), Hydro 2000 states that it is seeking a one-year disposition period. Please confirm the correct rate rider recovery period and updated the evidence as applicable. If 24 months, please provide an explanation as to why Hydro 2000 is seeking a 24-month disposition period.

Q 48. OEB staff notes there is no activity recorded in Account 1508 sub -account Retail Service Charge Incremental Revenue. Please confirm Hydro 2000 proposes to discontinue using this account on a going forward basis.

Q 49. Re: Cloud DVA:

Ref 1: EB-003-2023, Accounting Order, November 2, 2023[1]
Ref 2: Cloud Computing Implementation Q&A Document, PDF, February 2024[2]
Ref 3: EB-2024-0063, Notice, March 6, 2024

On November 2, 2023, the OEB issued the Accounting Order (003-2023) for the Establishment of a Deferral Account to Record Incremental Cloud Computing Arrangement Implementation Costs (Cloud Computing Implementation Report). The Cloud Computing Implementation Report noted that the Cloud Computing Implementation Account is generally intended to record cloud computing implementation costs when utilities first transition from on-premise solutions to cloud computing. In February 2024, the OEB hosted a webinar and Q&A session related to the Accounting Order for the establishment of a deferral account to record cloud computing arrangement implementation costs and issued a Q&A document.

On March 6, 2024, the OEB commenced a generic hearing (EB-2024-0063) on its own motion to consider cost of capital and other matters, including those related to the OEB's Cloud Computing Deferral Account (e.g., what type of interest rate, if any, should apply to this deferral account).

Please confirm whether Hydro 2000 has considered cloud computing solutions in its rebasing term and whether any amounts have been included in its forecast.

Q 50. Re: GOCA:

Ref 1: The OEB's Decision and Order for Getting Ontario Connected Act Variance Account, October 31, 2023.
On October 31, 2023, the OEB issued a decision and order EB-2023-0143 for Getting Ontario Connected Act Variance Account (GOCA variance account). The decision states that:

The OEB notes that the GOCA variance account will only be available to a utility until the end of its current IRM period. The account is not available for utilities that have reflected Bill 93 in their most recent rebasing applications.
The disposition of any balance in this account will be subject to a prudence review and a requirement to establish that any cost incurred over and above what is provided for in initial and IRM adjusted base rates is an incremental cost resulting from Bill 93.

[1] EB-003-2023, Accounting Order, November 2, 2023
[2] Cloud Computing Implementation Q&A Document, PDF, February 2024

a) Please confirm that the OM&A cost in the test year reflect any anticipated Bill 93 impacts for the Hydro 2000's locate costs.

b) Please confirm that the Account 1508 sub-account GOCA variance account is to be discontinued after this rebasing application and update the evidence accordingly.

Other

Q 51. Hydro 2000 provided a draft notice to engage with its customers once the OEB has officially accepted the application. Please provide information as to if and how that notice was published.

Q 52. It is noted that Hydro 2000 declined to undertake formal customer engagement activities as part of its application preparation given the high cost of customer engagement for a company as small as Hydro 2000 and the relatively modest benefit of any such engagement. Please identify, if possible, any other activities that Hydro 2000 has decided not to pursue given the cost of such activities and the modest benefits of those activities in relation to Hydro 2000's limited size.

Q 53. Please update RPP Pricing, OER and regulatory charges in all applicable models.

Q 54. Please confirm the date by which Hydro 2000 would need rate approval in order to implement rates effective May 1, 2025.