

2025-05-02

VIA EMAIL & RESS

Ms. Nancy Marconi
Registrar
Ontario Energy Board (OEB)
2300 Yonge Street, 26th Floor
PO Box 2319
Toronto, ON M4P 1E4
registrar@oeb.ca

Dear Ms. Marconi,

Re: EB-2024-0026 – Greater Sudbury Hydro Inc. (GSHi) – Draft Rate Order – Reply Comments

Greater Sudbury Hydro Inc. appreciates OEB staff's detailed comments dated April 30, 2025, on GSHi's Draft Rate Order (DRO). This letter responds to each item raised and identifies where the requested updates have been made.

1. Updated DVA Continuity Schedule

OEB staff requested that GSHi file a revised "DVA Continuity Schedule" incorporating the 2025 distribution-revenue update and the resulting Group 2 DVA rate riders. An updated DVA Continuity Schedule is filed with this submission. All customer classes now show revised Group 2 DVA rate riders; no other elements of the DVA Continuity Schedule have changed.

2. Revised Tariff Schedule & Bill Impact Model

Both versions of the OEB Tariff Schedule and Bill Impact Model (one showing only settled issues, the other including unsettled matters) have been updated using the updated Group 2 DVA rate riders and are filed in Excel format with this submission.

3. Specific Model Discrepancies

| Issue Raised by OEB Staff | GSHi Response |
|--|--|
| <p>Total Loss Factor – Primary-Metered < 5 000 kW: Table 19 of the Partial Settlement Proposal shows 1.0355, whereas Tab 5 of the Tariff Schedule shows 1.0354.</p> | <p>The variance of 0.0001 arises solely from rounding methodology:</p> <ul style="list-style-type: none"> • Table 19 in the settlement proposal applies the 1 % Primary Metering Allowance to the full-precision Distribution Loss Factor – Secondary Metered Customer (1.03857538728731). Following the incorporation of the Supply Facilities Loss Factor (1.0071) into the calculation ($1.03857538728731 \times (100\% - 1\%) \times 1.0071$), the resulting Total Loss Factor – Primary Metered Customer is 1.03549 which is rounded to 1.0355. • The Tariff of Rates and Charges applies the same 1 % allowance to the four-decimal-rounded Total Loss Factor – Secondary Metered Customer ($1.0459 \times (100\% - 1\%)$), producing 1.0354. <p>GSHi respectfully submits that the value 1.0354 should be retained because it (i) confers a benefit to customers; (ii) aligns with GSHi's billing-system logic, thereby mitigating implementation risk; and (iii) is immaterial in financial impact.</p> |
| <p>Regulatory-Charge parameters (Tab 3)</p> <ul style="list-style-type: none"> • Ontario Electricity Rebate (OER) should be 13.1 % (model showed 19.3 %) • RPP Time-of-Use prices should reflect the November 1, 2024, RPP Report • RRRP rate should be \$0.0015/kWh | <p>Tab 3 has been updated to reflect: (i) the current OER rate of 13.1 %; (ii) the Time-of-Use Regulated Price Plan prices in effect as of November 1, 2024; and (iii) the RRRP charge of \$0.0015/kWh. These revisions are also reflected on Tab 6. GSHi acknowledges the assistance of OEB staff in completing these corrections.</p> |

4. Stand-Alone Tariff of Rates and Charges

A standalone Tariff of Rates and Charges, reflecting all foregoing revisions, is filed with these reply comments.

GSHi believes the foregoing addresses every point in OEB staff's April 30th, 2025, comments. Should the Board or any party require additional information, please contact the undersigned at your convenience.

Yours truly,

Original Signed By

Tiija Luttrell, CPA, CA
Manager of Regulatory & Management Systems

Cc: Georgette Vlahos, Case Manager, Ljuba Djurdjevic, OEB Counsel, Mike Buonaguro,
Intervenors in EB-2024-0026