

**Colm Boyle**  
T: 416-367-7273  
cboyle@blg.com

**John Vellone**  
T: 416-367-6730  
jvellone@blg.com

Borden Ladner Gervais LLP  
Bay Adelaide Centre, East Tower  
22 Adelaide Street West  
Toronto ON M5H 4E3  
Canada  
T 416-367-6000  
F 416-367-6749  
blg.com



**File No. 17001.13**

September 22, 2025

**DELIVERED BY EMAIL**  
**registrar@oeb.ca**

Mr. Ritchie Murray  
Ontario Energy Board  
2300 Yonge Street, 27th floor  
P.O. Box 2319  
Toronto, ON M4P 1E4

Dear Mr. Murray,

**Re: E.L.K. Energy Inc. (“E.L.K. Energy”) Application for 2025 Distribution Rates (EB-2024-0015)  
Global Adjustment Analysis (“GA Analysis”) Workform**

On September 15, 2025, the Ontario Energy Board (“OEB”) issued Procedural Order No. 6 directed E.L.K. Energy to file an updated GA Analysis Workform that includes an updated Account 1588 tab for the years 2017 to 2020. If the Account 1588 balance exceeds the 1% reasonability threshold, the OEB directed E.L.K. Energy to provide detailed itemized explanations for each year where the Account 1588 balance exceeds the 1% reasonability threshold.

As noted in Procedural Order 6, the most current GA Analysis Workform filed May 2, 2025 indicated that over the period of 2016 to 2022 Account 1588 failed to meet the 1% reasonability test, and included a note in Tab Account 1588 indicating the primary driver “is believed to be the difference between the approved loss factor (8%) and the actual loss rate (Average 4.5%).”<sup>1</sup> Subsequently, E.L.K. Energy filed correspondence with the OEB on July 31, 2025, that on conclusion of its additional investigation of Accounts 1588 and 1589 with Hydro One Networks Inc. (“**HONI**”), the Independent Electricity System Operator (“**IESO**”) and its Metering Service Provider, “The investigations also did not uncover any error in the balances requested for disposition in Accounts 1588 and 1589.”

Cumulatively for the 2016 to 2023 years sought for disposition, the combined Transactions and Principal Adjustments in Account 1588 represent a significant credit position, and as such the vast majority of discrepancies exceeding the 1% reasonability test are to the benefit of ratepayers. As noted by E.L.K. Energy in previous submissions, “the extent of errors in historical entries was too extensive to allow for discrete identification of individual errors and adjustment of existing account

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<sup>1</sup> ELK\_Sup-IRR\_GA Workform\_20250502, Tab Account 1588, merged cells B58 to G63

balances...leading to E.L.K. Energy completing a full construction of the DVA Accounts sought for disposition.”<sup>2</sup> Although investigations with HONI and the IESO confirmed that unbilled power is not the cause of the Account 1588 discrepancies, the discrepancies persist.

The manner in which E.L.K. Energy was required to reconstruct historical balances has rendered the utility unable to ascertain discrete explanations for each year in question. As such, E.L.K. Energy is unable to provide detailed itemized explanations for each year where the Account 1588 balance exceeds the 1% reasonability threshold.

E.L.K. Energy has attached to this submission a revised GA Analysis Workform<sup>3</sup> as Ordered by the OEB, wherein the comment attributing 1588 variances in excess of 1% has been removed. E.L.K. Energy maintains its requests as articulated in its July 31, 2025 letter, including the request to dispose of material Account 1588 balances to the credit of ratepayers.

Yours truly,

**BORDEN LADNER GERVAIS LLP**

A handwritten signature in black ink, appearing to read "Colm Boyle". The signature is written in a cursive, flowing style.

Colm Boyle

CB/JV

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<sup>2</sup> Staff-10, page 5

<sup>3</sup> Consistent with prior practice in this proceeding, E.L.K. Energy has provided a GA Analysis Workform pertaining to 2016 to 2018, filename ELK\_Update\_GA\_Workform\_2016-2018\_20250922, and a GA Analysis Workform pertaining to 2019 to 2023, filename ELK\_Update\_GA\_Workform\_20250922