

**VIA RESS and EMAIL**

September 23, 2025

Ritchie Murray  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, Ontario M4P 1E4

Dear Ritchie Murray:

**Re: Milton Hydro Distribution Inc.  
2025 Accounting Order Application  
Consumers Council of Canada (CCC) Interrogatories  
OEB File No. EB-2025-0241**

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In accordance with the Notice of Hearing and Procedural Order No. 1, dated September 9, 2025, please find attached CCC's interrogatories with respect to Milton Hydro's application for approval to establish a variance account to record the revenue requirement impacts resulting from changes in shared services and corporate cost allocation.

Yours truly,



Lawrie Gluck  
Consultant for the Consumers Council of Canada

cc: All parties in EB-2025-0241

**Milton Hydro Distribution Inc.**  
**2025 Accounting Order**  
**Consumers Council of Canada**  
**Interrogatories**  
**September 23, 2025**

**CCC-1**

**Ref: Application, p. 4**

**Question(s):**

Please provide Milton Hydro's achieved and deemed ROEs for 2023 and 2024.

**CCC-2**

**Ref: Application, pp. 6-7**  
**EB-2022-0049, Settlement Proposal, p. 22**

**Question(s):**

- a) Please confirm that Milton Hydro's 2023 rates were established based on the OEB's approval of a full settlement between the company and CCC, SEC, VECC and an independent intervenor.
- b) Please confirm that the Parties to the settlement proposal agreed that the independent third-party review of the methodology to allocate common cost among its affiliates was to be filed at Milton Hydro's next rebasing.
- c) Please confirm that Milton Hydro's rates for the 2024-2027 period are expected to be established on the basis of the OEB's price-cap IR framework.
- d) Please advise and discuss what regulatory mechanism (e.g., ICM, Z-factor, etc.) would allow Milton Hydro to recover incremental amounts (in a variance account) associated with a change to shared service and corporate cost allocation in an incentive ratemaking term.

- e) Please provide Milton Hydro's position on the applicability of the OEB's eligibility requirements regarding the establishment of new deferral or variance accounts (as set out in the Chapter 2 – Cost of Service filing requirements) to applications made in an incentive ratemaking term.

**CCC-3**

**Ref: Application, pp. 4-5**

**EB-2017-0045, Decision and Order, pp. 17-18**

**EB-2017-0202, Decision and Order**

**Question(s):**

- a) With respect to the referenced decision regarding Halton Hills Hydro Inc.'s 2018 IRM application (EB-2017-0045), please confirm that the account conditionally approved by the OEB was related to an error in its depreciation expense that underpinned base rates. Please explain how this case is a relevant comparison to the request made by Milton Hydro in the current application.
- b) With respect to the referenced proceeding regarding Oakville Hydro Electricity Distribution Inc.'s request for an accounting order (EB-2017-0202), please confirm the following:
- i. The application was considered without holding a hearing.
  - ii. The decision was rendered by OEB staff and not a panel of commissioners.
  - iii. In Oakville Hydro's 2014 rebasing proceeding (prior to the filing of the relevant study), the parties agreed, as part of a settlement proposal, that Oakville Hydro would file the relevant cost allocation study in its 2016 IRM application (i.e., during the IR term and not at the next rebasing) with the intent that the OEB would determine how to proceed once the study was filed.
  - iv. The amount that was eventually recorded in the approved account was a credit to ratepayers.
- c) With respect to the referenced decision regarding Oakville Hydro Electricity Distribution Inc.'s request for an accounting order (EB-2017-0202), please explain

how this case is a relevant comparison to the request made by Milton Hydro in the current application.