



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

BY EMAIL

October 6, 2025

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4

Dear Ritchie Murray:

**Re: Canadian Niagara Power Inc.
Application for 2026 Electricity Distribution Rates
Ontario Energy Board (OEB) File Number: EB-2025-0050**

In accordance with Procedural Order No. 1, please find attached the Ontario Energy Board (OEB) staff interrogatories in the above proceeding. The applicant has been copied on this filing.

Canadian Niagara Power Inc.'s responses to interrogatories are due by October 20, 2025.

Any questions relating to this letter should be directed to Arlene Bernardo at Arlene.Bernardo@oeb.ca or at 437-880-8931. The OEB's toll-free number is 1-888-632-6273.

Yours truly,

Arlene Bernardo
Analyst, Electricity Distribution Rates

**OEB Staff Interrogatories
Canadian Niagara Power Inc.
EB-2025-0050**

Please note, Canadian Niagara Power Inc. (Canadian Niagara Power) is responsible for ensuring that all documents it files with the OEB, including responses to OEB staff interrogatories and any other supporting documentation, do not include personal information (as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*), unless filed in accordance with rule 9A of the OEB's *Rules of Practice and Procedure*.

Staff-1

Ref 1: Rate Generator Model, Tab 2, Current Tariff Schedule

Preamble:

Canadian Niagara Power selected "No" in the dropdown cell related to the accuracy of the Current Tariff Schedule Tab 2 of the Rate Generator Model.

Question(s):

- a. Please confirm whether this is an oversight and file an updated model reflecting the correct information. If this was an oversight, please confirm the accuracy of the Current Tariff Schedule.

Staff-2

Ref 1: Commodity Accounts Analysis Workform, GA 2023, Note 3

Ref 2: Commodity Accounts Analysis Workform, GA 2024, Note 3

Preamble:

Canadian Niagara Power selected "No" when asked whether the GA Rate used for unbilled revenue is the same as the rate used for billed revenue.

Question(s):

- a. Please explain why Canadian Niagara Power uses a different GA Rate for unbilled revenue and billed revenue.

Staff-3

Ref 1: Rate Generator Model, Tab 21, Bill Impacts

Ref 2: Manager's Summary, p.24

Preamble:

Canadian Niagara Power noted in Reference 2 that the bill impact for the Street Lighting class exceeded 10% and is unable to determine an appropriate mitigation proposal.

Canadian Niagara Power has also stated that the main reason for this is the expiry of a large credit rider from 2025 rates and expects a return to normal levels in 2026 following the expiry of this rider.

Question(s):

- a. Please confirm if Canadian Niagara Power has considered options to smooth or phase the resulting increase over a period longer than 12 months? If so, please provide the details. If not, please explain why it was not considered.
- b. Canadian Niagara Power has indicated that it plans to reach out to affected customers – primarily municipalities, regional governments, and the Ministry of Transportation. Please describe how Canadian Niagara Power plans to communicate to customers affected by this increase.

Staff-4

Ref 1: Rate Generator Model, Tab 10, RTSR Current Rates, cells E23 & E24

Ref 2: Manager's Summary, p.11

Preamble:

Canadian Niagara Power identified the billing units of potential customers that may be eligible for the Electric Vehicle Charging rate (EVC) and included the adjustments for these accounts in References 1 and 2.

Question(s):

- a. OEB staff observes in Reference 1 that no energy consumption is populated under the General Service 50 to 4,999kW service classification for EV-charging. Please explain as to why there is no energy forecasted for this rate class.

Staff-5

Unbilled Consumption

Ref 1: CNPI_Application 2026_IRM_2025 09 03, section 1.5.3, p.17

Ref 2: CNPI 2026_Commodity_Accounts_Analysis_Workform_2.0_2025 09 03, GA 2023 & GA 2024 & Account 1588, Note 4 & 5 & 7a

Preamble:

In Ref 1, Canadian Niagara Power bills its customers based on calendar month and states this method provides more direct and accurate information than using billed and unbilled estimate amounts.

In Ref 2, both Columns G & H are left blank in Note 4. In Note 5, for Account 1589, there are adjustments 2a & 2b related to unbilled to actual revenue differences for both 2023 and 2024. In Note 7a, for Account 1588, there are adjustments 3a & 3b related to unbilled to actual revenue differences for both 2023 and 2024.

OEB staff notes Canadian Niagara Power is using actual consumption billing for customers.

Question(s):

- a) Please explain why if Canadian Niagara Power is billing customers on actual consumption, there is an adjustment reflecting unbilled to actual revenue difference in Ref 2.
- b) Please update the evidence as applicable.

Staff-6

Class A Global Adjustment

Ref 1: CNPI 2026_Commodity_Accounts_Analysis_Workform_2.0_2025 09 03, (GA 2023 & GA 2024)-Note 5

Ref 2: (EB-2024-0011) CNPI_2025_GA_Analysis_Workform_20240815, GA 2023-Note 5

Preamble:

Canadian Niagara Power recorded the principal adjustments for Class A GA in Tab "GA 2023" and Tab "GA 2024" in Note 5 of the Commodity Accounts Analysis Workform (Ref 1).

Question(s):

- a) Please explain the nature of the principal adjustments for Class A GA that are recorded in Note 5 of the Commodity Accounts Analysis Workform for Account 1589, given that this account is related to Non-RPP Class B customers.

- b) Please confirm whether this adjustment is related to Class A GA unbilled revenue per Ref 2
- i. If yes, please explain why there is an unbilled revenue adjustment provided that Canadian Niagara Power is billing customers on actual consumption.
 - ii. If not, please explain why Canadian Niagara Power states in Ref 2 that it is a difference in Class A Global Adjustment (GA) accrued for unbilled revenue vs. IESO Class A GA CT 147 accrued expense.

Staff-7

CT 148 & CT 142 Recalculated Settlement Adjustment

Ref 1: CNPI 2026_Commodity_Accounts_Analysis_Workform_2.0_2025 09 03, (GA 2023 & GA 2024)-Note 5, Account 1588, Principal Adjustment-Note 9

Preamble:

OEB staff notes that Canadian Niagara Power does not indicate “yes/no” to 2023 CT 148 Recalculated Settlement Adjustment (\$12,362) in Note 5 of Ref 1 while it was included in the 2023 principal adjustment. In addition, this amount was recorded in GL in 2025 per Ref 1 while it got reversed in 2024. It is also noted that Account 1588 is missing this adjustment for 2024 while Account 1589 has the adjustment.

In Note 9, for 2023 CT 148 (\$56,204) and CT 142 (\$416,234) in Account 1588, Canadian Niagara Power indicates the amounts were recorded in GL in 2025 for 2023 principal adjustment while it shows 2024 as the year recorded in GL for the 2024 principal adjustment and also got reversed in 2024.

Question(s):

- a) For the (\$12,362), please indicate “yes/no” in Column I of Note 5 in GA 2023.
- b) Per Note 9, in Account 1589, please explain why Canadian Niagara Power reversed 2023 CT 148 Recalculated Settlement Adjustment (\$12,362) in 2024 while it was recorded in GL in 2025.
- c) Per Note 9, for 2023 CT 148 (\$56,204) and CT 142 (\$416,234) in Account 1588:
 - i. Please confirm which year these two adjustments were recorded in GL.
 - ii. If they were recorded in GL in 2025, why did Canadian Niagara Power reverse them in 2024?

Staff-8

GA 2023-Difference in GA IESO rate

Ref 1: CNPI 2026_Commodity_Accounts_Analysis_Workform_2.0_2025 09 03, GA 2023-Note 5, Account 1588

Preamble:

Canadian Niagara Power records a reconciling item #6 in Note 5 of Tab GA 2023 in the Commodity Accounts Analysis Workform. OEB staff has reproduced the reconciling item as below:

#	Item	Amount	Explanation	Principal Adjustment (Yes/No)	Explanation if No
6	Differences in GA IESO posted rate and rate charged on IESO invoice	\$ 11,200	Cumulatively estimated based on looking at 2023 IESO invoicing, some of which timing related from embedded generation and/or Class A submissions/re-submissions. \$56,000 of which an estimated 25% (non-RPP Class B as % of total Class B) of the variance remained in 1589.	No	Keep variance within current year presented for disposition purpose

Question(s):

- a) Please explain why this adjustment is a reconciling item and not a principal adjustment.
- b) OEB staff notes 25% of \$56,000 is \$14,000 while Canadian Niagara Power recorded \$11,200. Please correct this inconsistency.
- c) Please confirm whether the remaining 75% of \$56,000 was the RPP portion.
 - i. If yes, please explain why there is no corresponding adjustment in Account 1588 in Ref 1.
 - ii. If not, please explain where the rest of the 75% portion was recorded.

Staff-9

GA 2023-Prior period billing adjustments

Ref 1: CNPI 2026_Commodity_Accounts_Analysis_Workform_2.0_2025 09 03, GA 2023-Note 5-item 5a, Note 7a

Preamble:

Canadian Niagara Power states the (\$128,000) adjustment is related to 2022 consumption values and it includes the reclassification of (\$54,000) to Account 1588 based on CT 148 true-up impact.

Question(s):

- a) Please explain why this adjustment is reconciling item but not principal adjustment if it is for disposition purposes.
- b) Please explain why there is no correspond adjustment of (\$54,000) in Account 1588 per Note 7a for 2023 if this reclassification is related to 1588 per Ref 1.
- c) Please provide Note 7a of Account 1588 for 2024.

Staff-10

IESO CT 101

Ref 1: CNPI 2026_Commodity_Accounts_Analysis_Workform_2.0_2025 09 03, Account 1588

Ref 2: CNPI_Application 2026_IRM_2025 09 03, section 1.5.3, p.15

Ref 3: [Letter-Retro-Ratemaking-Guidance-20191031](#), p. 2

Preamble:

In Ref 1, Canadian Niagara Power provides a principal adjustment of \$1,298,000 in Tab "Account 1588" of the Commodity Accounts Analysis Workform with the explanation of "IESO CT 101 accrual and billed differences + Correction to a 2022 IESO CT142 submission in 2023".

In Ref 2, Canadian Niagara Power states Accounts 1588 and 1589 were last disposed on a final basis in its 2024 IRM application and included the balance as of December 31, 2022.

Question(s):

- a) Please provide the breakdown and detailed explanation for the principal adjustment of \$1,298,000, relating to each of the three drivers identified by Canadian Niagara Power below:
 - IESO CT 101 accrual
 - Billed differences

- Correction to a 2022 IESO CT 142 submission in 2023

- b) Please explain if the correction made to 2022 IESO CT 142 was accrued in the final disposed balances of Accounts 1588 and 1589 as of December 31, 2022.
- i. If yes, please provide the relevant evidence in Canadian Niagara Power's 2024 IRM application.
 - ii. If not, please address the rates retroactivity issue and address the four factors per Ref 3 in the OEB's letter issued on October 31, 2019.

Staff-11

National Grid Power Purchase 2023

Ref 1: CNPI_Application 2026_IRM_2025 09 03, section 1.5.3, p.15

Ref 2: CNPI 2026_Commodity_Accounts_Analysis_Workform_2.0_2025 09 03, GA 2023-Note 4, column L

Ref 3: (EB-2025-0081) dec_order_CNPI_20250617_esigned, Schedule B, p.19

Ref 4: (EB-2025-0081) CNPI_ReplySUB_Attach B_20250515

Ref 5: (EB-2025-0081) CNPI_ReplySUB_20250515, p.6 & 8

Ref 6: [IESO Data Directory Global Adjustment Report](#)

Ref 7: (EB-2025-0081) CNPI_Application_Licence_20250206, p.4

Preamble:

In Ref 1, Canadian Niagara Power states it purchased power from National Grid from August to September 2023 and has followed both the approved Accounting Order (Ref 3) and the Excel illustrative commodity model approved by the OEB (Ref 4).

In Ref 4, Canadian Niagara Power states that load for Fort Erie was taken off the IESO system and transferred to National Grid from August 20, 2023 to October 1, 2023 (the Period).

In Ref 2, the 'GA 2023' tab Cells I48 and I49 were modified from the GA Actual Rate that was being pulled in automatically from the 'GA Rates' hidden tab, to Canadian Niagara Power's calculated value of the actual GA rate paid \$/kWh.

In Ref 5, Canadian Niagara Power clarifies that the illustrative model (Ref 4) roughly represents the impact for the August 2023 period (additional purchases from National Grid occurred throughout the full month of September 2023 and it is expected that that impact will be more material than the purchases shown in the illustrative model for August 2023).

Per Refs 2 and 6, OEB staff has compiled the table below showing the differences of actual GA rates between the rates used by Canadian Niagara Power and the IESO posted actual rates for both August and September 2023.

	CNPI (Ref 2)	IESO (Ref 6)	Variance
Aug 2023	0.05712	0.0761	0.0190
Sept 2023	0.01525	0.0509	0.0357

Question(s):

- a) Please explain the total savings Canadian Niagara Power generated by using National Grid in 2023 compared to the same volume purchased from the Ontario Grid.
- b) Please confirm Canadian Niagara Power will pass on the total savings to customers based on harmonized rates across the entire service area.
- c) Please provide a high-level comparison of the power purchase price between National Grid and the IESO/Hydro One for August and September 2023, respectively.
- d) Please provide the breakdown of the total savings per the IESO charge types for the Period when Canadian Niagara Power used National Grid in 2023 (per Ref 4 and reconcile to a) above).
 - i. Please provide the breakdown of the amounts related to savings in the levels of transmission, wholesale market service, and other charges on Canadian Niagara Power's IESO invoice for the Period in 2023.
- e) Please provide live Excel worksheets to demonstrate the GA actual rate variance (avoided GA) identified in the table above compiled by OEB staff for August 2023 and September 2023, respectively.
 - i. Please include all the steps of the RPP Settlement Process per Ref 4.
 - ii. In each month's (August and September) worksheet, please show the calculation of the following items:
 - 1) Prorate the cost of power purchased between RPP and non-RPP Class B customers (split using the same percentages of RPP and non-RPP used to separate CT 148 for RPP settlement calculations) for all power purchased from the Ontario Grid.
 - 2) RPP sales volumes related to electricity purchased from National Grid that were excluded in the IESO CT 142 settlement calculations with the IESO.
 - 3) The GA savings impacts that were recorded in both Accounts 1588 and 1589, rather than recorded in Account 1588 only.
 - 4) Please provide associated journal entries of the Period per Ref 4 according to the updated Schedule 1 in Ref 5.

- 5) Please reconcile the GA savings to a) above
- f) At a high level, for the Period in Ref 4, please quantify and explain the impact on Accounts 1588 and 1589 if Canadian Niagara Power reports to the IESO the volumes supplied by National Grid and includes these volumes in the CT 142 RPP settlement calculations.

Staff-12

National Grid Power Purchase 2025

Ref 1: CNPI_Application 2026_IRM_2025 09 03, section 1.2, p.9

Preamble:

Canadian Niagara Power is currently using the IPL to supply its customers in Fort Erie (from National Grid) as of July 26, 2025 and expects this arrangement to be in place for approximately 7 weeks, concluding on September 15, 2025.

Question(s):

- a) Please provide a high-level estimate comparison of the power purchase price and GA avoided amount between National Grid and the IESO/Hydro One for the period mentioned in Ref 1.
- b) Please confirm whether Canadian Niagara Power is aware of any further planned work on the transmission system which will result in National Grid power being purchased in the upcoming period.
 - i. If yes, please provide the estimated schedule.

Staff-13

Question(s):

- a) In the instance the OEB releases any updated rates/charges (e.g., 2026 Uniform Transmission Rates) before Canadian Niagara Power provides its responses to OEB staff's interrogatories, please update the Rate Generator Model, as applicable. If any updates are made, please identify the rate and/or charge that has been updated.