

Grimsby Power Incorporated
EB-2025-0035
October 17, 2025

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Staff Question-1

Ref: EB-2025-0035, 2026 IRM Rate Generator Model, Tab 3, Continuity Schedule

Preamble:

On September 11, 2025, the OEB published the 2025 Quarter 4 prescribed accounting interest rates applicable to the carrying charges of deferral, variance and construction work in progress (CWIP) accounts of natural gas utilities, electricity distributors and other rate-regulated entities.

Question(s):

- a) Please confirm that Tab 3 (Continuity Schedule) reflects the Q4 2025 OEB-prescribed interest rate of 2.91%. If not, please update Tab 3, as necessary.

Grimsby Power Response Question 1

- a) Grimsby Power confirms that Tab 3 reflects the Q4 prescribed interest rate of 2.91%. See page 8 line 146 of our application filed August 14, 2025.

Staff Question-2

Ref 1: EB-2025-0035, 2026 IRM Rate Generator Model, Tab 3, Continuity Schedule, Columns BC and BH

Ref 2: EB-2024-0027, 2025 IRM Application, GPI_2025_IRM_Rate Generator Model_20241212, Tab 3, Continuity Schedule, Columns BG and BL

Ref 3: Chapter 3 Filing Requirements, June 19, 2025, pages 10 and 11

Preamble:

Chapter 3 of the Filing Requirements specifies that the opening principal amounts as well as the opening interest amounts for Group 1 balances, shown in the continuity schedule, must reconcile with the last applicable, approved closing balances.

OEB staff notes discrepancies in 1589 RSVA – Global Adjustment Account and 1580 RSVA Wholesale Market Service Charge account between the opening principal amounts and the opening interest amounts as of Jan 1, 2024 in the 2026 IRM Rate Generator Model and the closing principal and interest balance as of December 31, 2023 in the 2025 IRM Rate Generator Model, as indicated in Table 1.

Table 1

Account	Closing Principal Balance as of Dec 31, 2023	Opening Principal Amounts as of Jan 1, 2024	Closing Interest Balance as of Dec 31, 2023	Opening Interest Amounts as of Jan 1, 2024
1589 RSVA- Global Adjustment	\$111,165	\$111,121	\$11,813	\$11,864
1580 RSVA Wholesale Market Service Charge	N/A	N/A	\$25,990	\$25,991

Question(s)

- Please provide an explanation for the discrepancies in the accounts mentioned above.
- If this is an error, please reconcile the opening principal and opening interest amount with the last applicable and approved closing balances and file an updated IRM Rate Generator Model.

Grimsby Power Response Question 2

Account	Closing Principal Balance as of 31-Dec-23	Opening Principal Amounts as of 01-Jan-24	Principal Difference	Closing Interest Balance as of 31-Dec-23	Opening Interest Amounts as of 01-Jan-24	Interest Difference	Total Difference
1589 - RSVA- Global Adjustment	\$ 111,165	\$ 111,121	\$ 44	\$ 11,813	\$ 11,864	-\$ 51	-\$ 7
1580 - RSVA Wholesale Market Service Charge	N/A	N/A		\$ 25,990	\$ 25,991	-\$ 1	-\$ 1

- The discrepancy of \$44 in the principal balance of 1589 Global Adjustment at December 31, 2023, is due to the inclusion of a small balance from the 1589 Global Adjustment Deferral Recovery (GADR) account. In 2023, after the \$6,520 principal disposition of GADR there was a balance of \$44. This amount was included in 1589 2023 as it was still in our trial balance as of December

31st. The GADR amount of \$44 was disposed of in 2024 through a journal entry as Grimsby Power recognized that the remaining balance would not be recuperated through rates. This journal entry cleared the amount from the 1589 GADR account bringing the 1589 Global Adjustment balance to \$111,121.

The discrepancy in the 1589 interest account is also related to 1589 GADR. A total of (\$51) was included at the end of 2023 and disposed of through a journal entry in 2024.

The discrepancy between the 2023 ending and 2024 opening balance for 1589 was (\$7) including principal and interest.

The discrepancy in account 1580 of (\$1) is due to rounding.

- b) As per the response in a) the discrepancies were disposed of in 2024 and all regulatory balances match the trial balance total at the end of 2024. The (\$8) discrepancy has no impact on rates and no adjustments to opening balances have been made.

Staff Question-3

Ref 1: EB-2025-0035, 2026 IRM Rate Generator Model, Tab 3, Continuity Schedule, Column BU, Row 33

Ref 2: EB-2025-0035, 2026 IRM Application, Management Summary, 15. Disposition of 1595 (3.2.6.3), Page 16

Ref 3: EB-2024-0027, 2025 IRM Application, GPI_2025_IRM_Rate Generator Model_20241212, Tab 3, Continuity Schedule, Column BU, Row 34

Ref 4: EB-2024-0027, 2025 IRM Application, Decision and Rate Order, Issued December 12, 2024

Ref 5: Chapter 3 Filing Requirements, June 19, 2025, page 14

Preamble:

Grimsby Power Checked 'Yes' for account disposition for Account 1595 – Disposition and Recovery/Refund of Regulatory Balances (2021).

Grimsby Power has requested to dispose Account 1595 – Disposition and Recovery/Refund of Regulatory Balances (2021) in the 2025 Rates Application (EB-2024-0027). The Decision and Rate Order in the 2025 Rates Application approved the disposition of sub-account 1595 (2021) as part of the Group 1 Deferral and Variance Account.

Chapter 3 of the Filing Requirements specifies that distributors are expected to request disposition of residual balances in Account 1595 sub-accounts for each vintage year

only once, on a final basis.

Question(s):

- a) Please confirm if Grimsby Power is requesting to dispose Account 1595 – Disposition and Recovery/Refund of Regulatory Balances (2021) in the 2026 Rates Application.
- b) If not, please update Tab 3 and Tab 4, accordingly, to reflect the correct 1595 sub-account that Grimsby Power is requesting to dispose in the 2026 Rates Application.

Grimsby Power Response Question 3

- a) Grimsby Power selected Yes in column BU of Tab 3. Continuity Schedule however the total claim amount is \$0 in column BS (Total Interest) and BT (Total Claim). As per EB-2025-0035, 2026 IRM Application, Management Summary, 15. Disposition of 1595 (3.2.6.3), Page 16 GPI is only requesting the disposition of 1595 2022 not 2021.
- b) Grimsby Power has changed the selection in column BU to “No”. As the total claim amount is \$0 there are no changes to the total claim amount in tab 3 or tab 4, no further Rate Generator Model changes are required.

Staff Question-4

Ref: EB-2025-0035, 2026 IRM Rate Generator Model, Tab 3, Continuity Schedule

Preamble:

Chapter 3 of the Filing Requirements specifies that, when the OEB approves the disposition of Deferral and Variance Account (DVA) balances, the approved principal amounts and carrying charges are to be transferred to Account 1595 for the applicable rate year. Grimsby Power was approved disposition of a credit balance of \$394,441 as of December 31, 2023, including interest projected to December 31, 2024, for Group 1 accounts on a final basis.

Question(s):

- a) Please confirm that Grimsby Power has transferred this OEB-approved amount into Account 1595 – Disposition and Recovery/Refund of Regulatory Balances for the applicable rate year.

Grimsby Power Response Question 4

- a) Grimsby Power confirms that the OEB approved amount of (\$394,441) was transferred to 1595 (2025). Tab 3. Continuity Scheduled columns BM & BN reflect the total credit disposition for \$394,441 approved by the OEB.

Staff Question-5

Ref 1: EB-2025-0035, 2026 IRM Rate Generator Model, Tab 3, Continuity Schedule, Column BV, Row 25 and Note 5

Ref 2: EB-2025-0035, 2026 IRM Application, Management Summary, 15. Capacity Based Recovery (CBR) (3.2.6.2), Page 15

Ref 3: 2025 RRR Filing Guide for Electricity Distributors' reporting and record keeping requirements (RRR), March 14, 2025, Page 114

Preamble:

Grimsby Power has recorded a balance of \$129,952 in Column BW for Account 1580 RSVA – Wholesale Market Service Charge, but has a balance of 0 for both Variance WMS – Sub-account CBR Class A and Variance WMS – Sub-account CBR Class A, Cell BV24 and Cell BV 25, respectively.

As per the 2025 RRR filing guide, the reported Account 1580 balance should include the balances in the Wholesale Market Service, sub-account CBR Class A, and sub-account CBR Class B.

Question(s):

- a) Please confirm if Grimsby Power has submitted a revision request to the RRR filing. If not, please explain why.

Grimsby Power Response Question 5

- a) Grimsby Power includes WMS, WMS sub account CBR Class A and Class CBR B in account 1580. The balance of account 1580 was (\$135,086) on December 31, 2024. The table below shows the breakdown of amounts in 1580.

1580	RSVA - Wholesale Market Service Charge	-\$ 254,269
1580	RSVA - Rural Rate Assistance	-\$ 10,770
1580	RSVA - Wholesale Market Service - CBR Class B	\$ 129,952
1580	RSVA – Wholesale Market Service – CBR Class A	\$ 0
Total		-\$ 135,086

In the trial balance, an amount of (\$135,086) is documented in account 1580, while \$265,039 is noted in the 1580 WMS regulatory account. The difference between the trial balance figure and the amount recorded in the regulatory account, as shown in column BW, represents the account balance for sub-account CBR class B, which totals \$129,952.

A corresponding CR balance (\$129,952) can be found in column BW, row 25 for 1580 sub account CBR Class B. The trial balance shows a recorded amount of 0 for the 1580 sub account CBR, while the regulatory account reflects an amount of \$129,952. The total balance in column BW for both WMS and the WMS sub account Class B is zero. Grimsby Power has not submitted a revision request for the RRR.

Staff Question-6

Ref: EB-2025-0035, 2026 IRM Rate Generator Model, Tab 12 and Tab 13

Preamble:

OEB staff notes that the 2025 Transformation Connection Service Rate under Uniform Transmission Rates is empty in the 2026 IRM Rate Generator Model filed by Grimsby Power.

Question(s):

- a) Please confirm that Grimsby Power removed the 2025 Transformation Connection Service Rate as Grimsby Power's Niagara West Transmission Station is a transmission asset, deemed a distribution asset, and thus not charged for Transmission Connection by the Independent Electricity System Operator.

Grimsby Power Response Question 6

- a) Grimsby Power confirms that it removed the 2025 Transformation Connection Service rate as GPI is not charged for Transmission Connection by the IESO.

Staff Question-7

Ref 1: EB-2025-0035, 2026 IRM Application, Management Summary, 12. Commodity Accounts 1588 and 1589 (3.2.6.1), Page 11

Ref 2: EB-2025-0035, 2026 IRM Rate Generator Model, Tab 3, Continuity Schedule, Column BT, Row 29

Preamble:

Grimsby Power states in the application that it requests to dispose of the \$245,168 balance in Account 1589. The total claim for Account 1589 is \$245,186 in Tab 3 of the Rate Generator Model.

Question(s):

- a) Please confirm the amount to be disposed in account 1589 RSVA – Global Adjustment. Please update the Rate Generator Model to reflect the appropriate claim value, if necessary.

Grimsby Power Response Question 7

- a) Grimsby Power confirms that the 1589 RSVA – Global Adjustment disposition amount is \$245,186 as per Tab 3. Continuity Schedule column BT row 29. No changes to the Rate Generator model are required.

Staff Question-8 Question(s):

- a) As applicable, please update the Rate Generator Model to reflect any updated rates/charges (e.g., 2026 Uniform Transmission Rates).

Grimsby Power Response Question 8

- a) Grimsby Power has updated the Rate Generator Model Tab 11. RTSR – UTRs & Sub-Tx to reflect the 2026 Preliminary Uniform Transmission Rates as per the OEB letter dated October 9, 2025 (EB-2025-0232).