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BY EMAIL

November 3, 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.
2026 IRM Electricity Distribution Rates
Ontario Energy Board (OEB) File Number: EB-2025-0050**

In accordance with Procedural Order No. 2, please find attached the Ontario Energy Board (OEB) staff supplementary interrogatories in the above proceeding. The applicant has been copied on this filing.

Canadian Niagara Power Inc.'s responses to interrogatories are due by November 10, 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 Supplementary 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 Supplementary-1

Global Adjustment (GA) Billing Rate

Ref 1: CNPI_IRR_20251017, Staff-2, p. 4

Ref 2: OEB-MRP-Accounting-Guidance-Update-Commodity_Accounts-04282025, the second to last paragraph, p. 14

Preamble:

In Reference 1, Canadian Niagara Power states that it bills on the 2nd Global Adjustment (GA) estimate and uses the 1st GA estimate for unbilled revenues.

In Reference 2, the Accounting Guidance for the Commodity Pass-through variance accounts states that the GA price used for unbilled revenue purposes must be at the same price for which customers will ultimately be invoiced.

Question(s):

- a) Please explain why Canadian Niagara Power's practice is different than the one stated in the Accounting Guidance.
- b) Please clarify if Canadian Niagara Power's practice impacts the year-end revenues and therefore impacts the year-end balances in Account 1589.
 - i. If confirmed, please explain whether Canadian Niagara Power's external auditor agrees with this unbilled price of using different rates as the ones used in billed revenues.
 - ii. If confirmed, please quantify the impact of Canadian Niagara Power's practice on the account balance of Account 1589 as compared to using the same GA rates in unbilled accruals.

Staff Supplementary-2

GA 2023-Difference in GA IESO rate

Ref 1: CNPI_IRR_20251017, Staff-8 (b) & (c), p. 15

Ref 2: CNPI_AttE_2026_Commodity_Accounts_Analysis_Workform_2.0_20251015,
GA 2023-Note 5, Account 1588

Preamble:

Per Reference 1, Canadian Niagara Power states the remaining 75% of \$56,000 is the RPP portion and is reflected within the 2023 CT 142 Recalculated Settlement Adjustment (Item 8) which is marked as Principal Adjustment (PA) in Note 7a per Ref 2.

Per Reference 2, OEB staff notes the 25% of \$56,000 (\$14,000), the corresponding adjustment in GA portion, is not recorded as PA.

Question(s):

- a) Please confirm the inconsistency identified above.
- b) Please explain why 25% of \$56,000 is not a PA while its corresponding 75% part is a PA.

Staff Supplementary-3

National Grid Power Purchase 2023

Ref 1: CNPI_IRR_20251017, Staff-11

Ref 2: CNPI_AttE_2026_Commodity_Accounts_Analysis_Workform_2.0_20251015,
GA 2023 Note 4

Ref 3: CNPI_IRR_AttachmentC_20251016

Ref 4: CNPI_IRR_AttachmentD_20251016

Ref 5: (EB-2025-0081) CNPI_ReplySUB_Attach B_20250515

Ref 6: (EB-2025-0081) OEB_Staff_SUB_CNPI_20250501, Item 4, p. 9

Question(s):

- a) In Reference 1, per the response provided in Table Staff-11-4, OEB staff notes the IESO Actual Billed Peak for August 2023 is more than double that of September 2023, while it was noted that load for Fort Erie was taken off the IESO system and transferred to the National Grid from August 20th, 2023 to October 1st, 2023. The month of August 2023 ended up incurring cost instead of savings for the transmission charges.
 - i. Please explain why August 2023 was billed for more than double the consumption for 10 days compared to September 2023, when the load was taken off for the entire month.

- ii. Please explain why purchasing power from the National Grid could incur additional costs for ratepayers, in light of the observed billing in August-2023 occurring additional cost instead of savings.
- b) Per Reference 3, following the process demonstrated in Reference 5, OEB staff asks Canadian Niagara Power to clarify whether it agrees with OEB staff's calculation of the RPP settlement process (i.e., GA avoided savings) and explain the **variance** identified.

In the tab "Data for Settlement & 1st TU":

CNPI (a):

\$1,869,466 (cell H58) represents the actual GA invoiced by IESO CT 148 in Aug

\$0.05712 (cell G58) represents the Class B GA Actual rate billed by IESO CT 148

OEB Staff (b):

25,507,926 kWh excluding the National Grid kWh (cell H11) X \$0.0761 Class B GA Actual IESO post rate (cell G57) = **\$1,940,133** actual GA billed by IESO CT 148 in Aug

\$1,940,133 / 32,728,893 kWh including the National Grid kWh (cell H14) = **\$0.05928** actual GA billed by IESO CT 148 in Aug

	CNPI (a)	OEB Staff (b)	Variance 1 (b-a)
Actual GA invoiced by IESO CT 148 in Aug	\$1,869,466	\$1,940,133	\$70,667
Class B GA Actual rate billed by IESO CT 148	\$0.05712	\$0.05928	\$0.00216

CNPI	Cell I62	Cell I75 + Cell I76	Variance 2 (b-a)
Actual CT 148 per IESO Invoice	\$1,940,133	\$1,869,466	(\$70,667)

- i. Please explain Variances 1 and 2 identified in the tables above.
- ii. Please explain why cell H58 is hardcoded while it was calculated per formula in the same tab of Reference 5.
- iii. Please re-submit an updated Attachment C after applying all the changes.

- c) Per Reference 4, following the process demonstrated in Reference 5, OEB staff asks Canadian Niagara Power to clarify whether it agrees with OEB staff's calculation of the RPP settlement process (i.e., GA avoided savings) and explain the variance identified.

In the tab "Data for Settlement & 1st TU":

CNPI (a):

\$426,836 (cell H58) represents the actual GA invoiced by IESO CT 148 in Aug

\$0.01525 (cell G58) represents the Class B GA Actual rate billed by IESO CT 148

OEB Staff (b):

7,034,621 kWh excluding the National Grid kWh (cell H11) X \$0.0509 Class B GA Actual IESO post rate (cell G57) = **\$358,273** actual GA billed by IESO CT 148 in Aug

$\$358,273 / 27,994,744$ kWh including the National Grid kWh (cell H14) = **\$0.01280** actual GA billed by IESO CT 148 in Aug

	CNPI (a)	OEB Staff (b)	Variance 3 (b-a)
Actual GA invoiced by IESO CT 148 in Aug	\$426,836	\$358,273	(\$68,563)
Class B GA Actual rate billed by IESO CT 148	\$0.01525	\$0.01280	(\$0.00245)

CNPI	Cell I62	Cell I75 + Cell I76	Variance 4 (b-a)
Actual CT 148 per IESO Invoice	\$358,273	\$426,836	\$68,563

- i. Please explain Variances 3 and 4 identified in the tables above.
- ii. Please explain why cell H58 is hardcoded while it was calculated per formula in the same tab of Reference 5.
- iii. Please re-submit an updated Attachment D after applying all the changes.

- d) Per Reference 2, OEB staff notes Canadian Niagara Power manually adjusted Cell I48 and Cell I49 to reflect actual GA rates billed by the IESO. OEB staff is of the view that the Commodity Accounts Analysis Workform is the standard template which should not be altered.
- i. Please reflect the IESO posted actual GA rate in Column L of Note 4.
 - ii. Please list the GA avoided savings for August 2023 and September 2023 separately in Note 5.
 - iii. Please reconcile the GA avoided savings to update Reference 3 and Reference 4.
 - iv. Please re-submit the updated Commodity Accounts Analysis Workform reflecting the changes required in the above-mentioned i, ii, and iii.