CANADIAN NIAGARA POWER INC.
A FORTIS ONTARIO Company

November 7, 2025

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

Dear Mr. Murray:

Re: Canadian Niagara Power Inc. ("CNPI") – 2026 IRM Application Supplemental Interrogatory Responses
(EB-2025-0050)

As set out in the OEB's October 31, 2025 Procedural Order No. 2, please find attached CNPI's responses to supplemental interrogatories from OEB staff.

CNPI confirms that the responses do not include personal information as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*.

Please direct any questions or correspondence in this matter to the undersigned.

Sincerely,

Oana Stefan

Digitally signed by Oana Stefan
Date: 2025.11.07 13:23:37 -05'00'

Oana Stefan
Manager, Regulatory Affairs
RegulatoryAffairs@FortisOntario.com

Contents

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.

Response:

a) CNPI has very tight financial close and financial reporting deadlines. Using the second estimate would result in a significant time delay in meeting these tight reporting deadlines. As such (as mentioned in Reference 1 above), CNPI utilizes the Global Adjustment first estimate (the most currently available pricing) as unbilled

reports are run immediately after billing is closed off for the month, which is typically scheduled for the second to last business day of the month. At that point in which the unbilled reports are run, only the Global Adjustment first estimate is published and available. In footnote 30 of Reference 2 (at the bottom of page 14) above, CNPI has used the following the statement as a guiding factor "the distributor should use the most current pricing information available for unbilled revenue purposes. The difference between unbilled and actual GA would need to be reflected in the balance of the account for the year to which it relates."

b) CNPI confirms that there is an impact on the year-end revenues due to using the first estimate instead of the second Global Adjustment estimate. However, that impact is both reconciled on the Commodity Accounts Analysis Workform (Note 5 – Reconciling Items in 2a and 2b) and is also reflected as part of the principal adjustments in the 1589 balances being requested for disposition in the DVA Continuity Schedule. Therefore, effectively the ending balance requested for disposition in 1589 is reflective of effectively using the second GA estimate both for billing and accruals.
    i. CNPI has received unqualified audit opinions on balances reported in its financial statements.
    ii. The balances are quantified in the Commodity Accounts Analysis Workform (Note 5 Reconciling Items). The reconciling/adjusting amount related to 2023 was $20,653, and the amount related to 2024 was $67,180. Both amounts are included in the principal adjustments column of the DVA Continuity Schedule. The $67,180 (for 2024), for example, is also shown in Note C of Table 5 (page 14 of 14) of the Application.

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.

Response:

a) CNPI confirms that one item (the non-RPP value of $14,000) is shown as a reconciling line in the Commodity Accounts Analysis Workform because the GA would have been paid to the IESO in 2023 and therefore reflected in the actual GL transactional activity for the year. Therefore, CNPI needed to show the $14,000 as a reconciling (but not principal adjusting) line item between the expected GA variance calculated and what was actually recorded in the transactions for 1589 for the 2023 year. Conversely, the 2023 CT 142 recalculated settlement adjustment was not submitted to the IESO in 2023 (to be submitted in 2025), which is why in 1588 in the Commodity Accounts Analysis Workform the amount shows as both a reconciling and a principal adjustment.

b) See a) above. To further clarify, there also is a ($12,362) CT 148 recalculated settlement amount in 2023 in the Commodity Accounts Analysis Workform which shows as both a reconciling and principal adjustment amount. This adjustment

amount is directly related to the outcome of the 2023 CT 142 recalculated settlement adjustment amounts as the CT 142 recalculated settlement adjustments drive a reclass between 1588 and 1589 in accordance with the OEB guidance. Therefore, CNPI believes that the remaining $42,000 in GA differences (75% of the $56,000) is factored into both 1588 and 1589 correctly, both as principal adjustments and as reconciling items.

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.

Response:

a)

i. CNPI receives one monthly IESO invoice for power that has been supplied to both Fort Erie and Port Colborne regions. The invoice includes multiple wholesale meter points of which there are both commodify and demand (i.e. transmission) based amounts invoiced to CNPI for power that has passed through each of those wholesale points. For August 2023, given that there was power that passed through all of these wholesale meter points for at least a portion of the month, this in turn attracted the associated demand (i.e. transmission network and connection) based charges for each of the respective meter points. CNPI notes that the billed connection and network demand totals are slightly over the estimated total peak noted for August 2023 in part due to how the load switching configuration happened when load was switched around the sub-stations in Fort Erie so as to facilitate transitioning power purchased from the IESO to National Grid during that month, however this load switching did not have a **material** increase on the estimated demand charges

In comparison, power did not pass through all of the same wholesale meter points in September as the town of Fort Erie was supplied by National Grid for the full month of September; this is why peak demand is significantly

lower in September 2023 as compared to August 2023 (and compared to other typical months).

CNPI notes the level of transmission load in August 2023 was within normal range (despite the immaterial increase caused by the load switching). The August 2023 billed units for Network, Line Connection and Transformation Connection were lower than those billed in July 2023 (one month earlier), and August 2024 (one year later).

In summary, an immaterial increase in transmission billing units was experienced in August 2023, however August 2023 transmission billing units remained within typical levels. The immaterial increase in August 2023 was more than offset by the decrease and savings from September 2023, where transmission billing units were less than half the typical level.

ii. CNPI notes that the estimated additional costs incurred in August 2023 (due to load switching temporary increases as described in i. above) were more than offset by the transmission savings in the subsequent month, and significantly lower than thetotal net savings realized for power purchased from National Grid during the month of September 2023 (as outlined in Ref 1), such that overall there was a net savings for the 2023 power purchased from National Grid. In Staff-12, for 2025, CNPI has roughly estimated that approximately $700,000 to $800,000 CAD is expected to be the net savings when comparing the cost of National Grid purchases to what the IESO would have otherwise billed through CT 1115 and 148. Also, in its response to Staff-12 , CNPI confirms that at this time it does not have any confirmed further planned transmission work to be done that will results in National Grid power being purchased.

Given the above, CNPI does recognize that past experiences are not always indicative of what may happen in the future (i.e. variables needed to be considered such as significant changes in exchange rates, changes in pricing structure, and the overall quantity and timing of power purchased). However, with the appropriate timing and load switching considerations, CNPI believes that purchasing power from National Grid may generally not result in additional costs to CNPI; rather there generally should be net savings. CNPI recognizes that savings cannot be guaranteed, but will make best efforts to give consideration to at least some of these variables noted above when

planning out power purchases from National Grid, should they occur in the future. Ultimately, CNPI purchases power from National Grid from time to time in order to enhance reliability and provide continuity of service to Fort Erie customers during some transmission outages, and this is the primary objective of the National Grid purchases through the International Power Line (IPL).

b)

i. CNPI understands the calculations and variances that are being shown for both Variance 1 and 2 (and Variances 3 and 4). CNPI believes that the calculations proposed by CNPI to date within this proceeding have followed the intended (and approved) approach as laid out in EB-2025-0081.

Variance 1

For August 2023, the CNPI (a) calculation of $0.05712 represents, in CNPI's view, the effective GA rate paid to the IESO. CNPI believes that this approach gives consideration to how the effective GA rate is to be calculated/used when calculating CT 142 settlement amounts per OEB's 1588/1589 settlement calculation guidance. The calculation of $0.05712 was derived by inputting the actual CT 148 GA billed to CNPI for the month of August 2023 (Note: There is a $15,719 adjustment due to a Class A correction re-submission that was subsequently done which in turn impacted the CT 148 for August 2023), and then dividing by the wholesale kWh volumes (excluding Class A kWhs).

In comparison, the OEB Staff (b) has derived its calculation of $0.05928 by assuming that the IESO charged CNPI exactly the final Class B posted rate of $0.0761 for August 2023.

CNPI has observed that the actual posted Global Adjustment rate and the effective invoiced rate may differ. In this case, as the OEB has pointed out, differs in August 2023 by an estimated $70,667.

Variance 2

See comments in Variance 1 above as well as ii. below.

CNPI recommends, based considering OEB 1588/1589 settlement guidance, to continue to use the CNPI calculated effective rate of $0.05712 for August 2023 rather than using the OEB "expected" calculated rate of $0.05928.

ii. Cell H58 was hardcoded in Reference 3 as that model assumed that the GA billed per CT 148 would be exactly equal to the GA actual rate posted by the IESO ($0.0761) multiplied by IESO AQEW plus embedded generation less Class A. At the time that Reference 3 was prepared, this formula was intentionally not changed because CNPI did not want to deviate formulae and format of Reference 3 significantly from the model that was previously provided within the initial Application (App B of EB-2025-0081). In retrospect, recognizing that CT 148 is not always exactly billed that way (i.e. as is the case for both August and September 2023), H58 should have been hardcoded and given a value slightly different than the $1,940,550 (i.e. CNPI should have used the value of $1,869,466) to better reflect the reality of what CNPI was actually billed for that month.

iii. Based on responses to i. and ii. above, CNPI believes that no further updates should be made to any of the modeling or submission amounts at this time.

c)

i. Please refer to response provided in b) i) above which provided explanations for August 2023 variances. The same response and explanation can be applied to the September 2023 Variance 3 and 4 calculations.

CNPI believes that it is possible that the actual and expected effective rates may differ and in this case, as the OEB has pointed out in Variance 3 and 4, differs in this month by an estimated ($68,563).

ii. Please refer to response provided in b) i) above which provided explanations for the August 2023 variances. The same response and explanation can be applied to the September 2023 calculations.

iii. Based on responses to i. and ii. above, CNPI believes that no further updates should be made to any of the modeling or submission amounts at this time.

d)

i. CNPI updated Column L of Note 4 to reflect IESO posted actual GA rate.

ii. CNPI updated Note 5 to reflect the calculated differences between the IESO posted actual GA rate and the GA rate billed. August and September 2023 have been presented together for a reconciling total of $549,434 due to limited line items rows available on the WorkForm. See the table below for a further breakdown by month.

	August	September	Total	
Expected GA Price Variance ($) per IRR GA Workform	59,962	(574,762)	(514,800)	**A**
Expected GA Price Variance ($) per IRR Supplemental GA Workform	263,500	(228,866)	34,634	**B**
	203,538	345,896	549,434	**C = B - A**

iii. Due to the slight differences in the underlying calculations, there are some differences between the differences quantified in d) ii) above and the differences calculated in Reference 3 and Reference 4 above.

	August	September	Total	
Estimated Non-RPP Avoided GA per Reference 3 and 4.	151,404	307,055	458,459	**A**
Estimated Non-RPP Avoided GA per d) ii. above	203,538	345,896	549,434	**B**
	52,134	38,841	90,975	**C = B - A**

iv. CNPI has resubmitted an updated Commodity Accounts Analysis Workform reflecting the above changes (Attachment A).

Attachment "A"

Commodity Accounts Analysis Workform

Ontario Energy Board

Commodity Accounts Analysis Workform for 2026 Rate Applications

Formerly "GA Analysis Workform"

Version 1.0

Unlock Model

Input cells
Drop down cells

Utility Name Canadian Niagara Power Inc.

Note 1

For Account 1589 and Account 1588, determine if a or b below applies and select the appropriate year related to the account balance in the drop-down box to the right.

Year Selected

2022

a) If the account balances were last approved on a final basis, select the year of the year-end balances that were last approved on a final basis.
b) If the account balances were last approved on an interim basis, and
i) there are no changes to the previously approved interim balances, select the year of the year-end balances that were last approved for diposition on an interim basis. OR
ii) there are changes to the previously approved interim balances, select the year of the year-end balances that were last approved for disposition on a final basis. An explanation should be provided to explain the reason for the change in the previously approved interim balances.

(e.g. If the 2022 balances that were reviewed in the 2024 rate application were to be selected, select 2022)

Instructions:
1) Determine which scenario above applies (a, bi or bii). Select the appropriate year to generate the appropriate Commodity Accounts Analysis Workform tabs, and information in the Principal Adjustments tab and Account 1588 tab.
For example:
• Scenario a -If 2023 balances were last approved on a final basis - Select 2023 and a Commodity Accounts Analysis Workform for 2024 will be generated. The input cells required in the Principal Adjustment and Account 1588 tabs will be generated accordingly as well.
• Scenario bi - If 2023 balances were last approved on an interim basis and there are no changes to 2023 balances - Select 2023 and a Commodity Accounts Analysis Workform for 2024 will be generated. The input cells required in the Principal Adjustment and Account 1588 tabs will be generated accordingly as well.
• Scenario bii - If 2023 balances were last approved on an interim basis, there are changes to 2023 balances, and 2022 balances were last approved for disposition - Select 2022 and Commodity Accounts Analysis Workforms for 2023 and 2024 will be generated. The input cells required in the Principal Adjustment and Account 1588 tabs will be generated accordingly as well.
2) Complete the Commodity Accounts Analysis Workform for each year generated.
3) Complete the Account 1588 tab. Note that the number of years that require the reasonability test to be completed are shown in the Account 1588 tab, depending on the year selected on the Information Sheet.
4) Complete the Principal Adjustments tab. Note that the number of years that require principal adjustment reconciliations are all shown in the one Principal Adjustments tab, depending on the year selected on the Information Sheet.

See the separate document Commodity Accounts Analysis Workform Instructions for detailed instructions on how to complete the Workform and examples of reconciling items and principal adjustments.

Year	Annual Net Change in Expected GA Balance from GA Analysis	Net Change in Principal Balance in the GL	Reconciling Items	Adjusted Net Change in Principal Balance in the GL	Unresolved Difference	$ Consumption at Actual Rate Paid	Unresolved Difference as % of Expected GA Payments to IESO
2023	$ (173,177)	$ (217,732)	$ (21,361)	$ (239,093)	$ (65,915)	$ 8,246,825	-0.8%
2024	$ 153,506	$ (58,215)	$ 104,551	$ 46,336	$ (107,170)	$ 8,148,858	-1.3%
Cumulative Balance	**$ (19,671)**	**$ (275,947)**	**$ 83,190**	**$ (192,757)**	**$ (173,085)**	**$ 16,395,683**	**N/A**

Account 1588 Reconciliation Summary

Year	Account 1588 as a % of Account 4705
2023	-1.2%
2024	-0.3%
Cumulative Balance	-1.6%

Ontario Energy Board

Commodity Accounts Analysis Workform

Note 2 **Consumption Data Excluding for Loss Factor (Data to agree with RRR as applicable)**

Year		2023		
Total Metered excluding WMP	C = A+B	476,879,269	kWh	100%
RPP	A	291,321,857	kWh	61.1%
Non RPP	B = D+E	185,557,412	kWh	38.9%
Non-RPP Class A	D	79,290,757	kWh	16.6%
Non-RPP Class B*	E	106,266,655	kWh	22.3%

Show RRR data Yes

*Non-RPP Class B consumption reported in this table is not expected to directly agree with the Non-RPP Class B Including Loss Adjusted Billed Consumption in the GA Analysis of Expected Balance table below. The difference should be equal to the loss factor.

Note 3 **GA Billing Rate**

GA is billed on the 2nd Estimate

Please confirm that the same GA rate is used to bill all customer classes. If not, please provide further details Yes

Please confirm that the GA Rate used for unbilled revenue is the same as the one used for billed revenue in any paticular month No

Note 4 **Analysis of Expected GA Amount**

Year 2023

Calendar Month	Non-RPP Class B Including Loss Factor Billed Consumption (kWh)	Deduct Previous Month Unbilled Loss Adjusted Consumption (kWh)	Add Current Month Unbilled Loss Adjusted Consumption (kWh)	Non-RPP Class B Including Loss Adjusted Consumption, Adjusted for Unbilled (kWh)	GA Rate Billed ($/kWh)	$ Consumption at GA Rate Billed	GA Actual Rate Paid ($/kWh)	$ Consumption at Actual Rate Paid	Expected GA Price Variance ($)
	F	G	H	I = F-G+H	J	K = I*J	L	M = I*L	N=M-K
January	9,166,291			9,166,291	0.05145	$ 471,606	0.05377	$ 492,871	$ 21,266
February	8,406,340			8,406,340	0.08370	$ 703,611	0.08249	$ 693,439	$ (10,172)
March	9,317,917			9,317,917	0.06864	$ 639,582	0.08031	$ 748,322	$ 108,740
April	8,216,096			8,216,096	0.11617	$ 954,464	0.09853	$ 809,532	$ (144,932)
May	8,724,670			8,724,670	0.09384	$ 818,723	0.09962	$ 869,152	$ 50,429
June	9,212,303			9,212,303	0.08972	$ 826,528	0.08293	$ 763,976	$ (62,552)
July	11,128,635			11,128,635	0.05105	$ 568,117	0.04949	$ 550,756	$ (17,361)
August	10,746,310			10,746,310	0.05154	$ 553,865	0.07606	$ 817,364	$ 263,500
September	9,693,592			9,693,592	0.07454	$ 722,560	0.05093	$ 493,695	$ (228,866)
October	9,208,286			9,208,286	0.08433	$ 776,535	0.08498	$ 782,520	$ 5,985
November	8,912,102			8,912,102	0.08288	$ 738,635	0.07090	$ 631,868	$ (106,767)
December	8,959,970			8,959,970	0.06759	$ 605,604	0.06622	$ 593,329	$ (12,275)
Net Change in Expected GA Balance in the Year (i.e. Transactions in the Year)	**111,692,513**	-	-	**111,692,513**		**$ 8,379,829**		**$ 8,246,825**	**$ (133,004)**

Annual Non-RPP Class B Wholesale kWh *	Annual Non-RPP Class B Retail billed kWh	Annual Unaccounted for Energy Loss kWh	Weighted Average GA Actual Rate Paid ($/kWh)**	Expected GA Volume Variance ($)
O	P	Q=O-P	R	P= Q*R
111,148,420	111,692,513	- 544,093	0.07384	$ (40,173)

Equal to (AQEW - Class A + embedded generation kWh)(Non-RPP Class B retail kwh/Total retail Class B kWh)

**Equal to annual Non-RPP Class B $ GA paid (i.e. non-RPP portion of CT 148 on IESO invoice) divided by Non-RPP Class B Wholesale kWh (as quantified in column O in the table above)

Total Expected GA Variance **$ (173,177)**

Calculated Loss Factor 1.0511

Most Recent Approved Loss Factor for Secondary Metered Customer < 5,000kW 1.0524

Difference **-0.0013**

a) Please provide an explanation in the text box below if columns G and H for unbilled consumption are not used in the table above.

CNPI bills it's customers based on calendar month and has reports available that show a breakdown on consumption billed

b) Please provide an explanation in the text box below if the difference in loss factor is greater than 1%

N/A - within threshold.

Note 5 **Reconciling Items**

	Item	Amount	Explanation	Principal Adjustments	
	Net Change in Principal Balance in the GL (i.e. Transactions in the Year)	$ (217,732)		**Principal Adjustment on DVA Continuity Schedule**	**If "no", please provide an explanation**
1a	CT 148 True-up of GA Charges based on Actual Non-RPP Volumes - prior year	$ (30,000)	Nov and Dec 2022 RPP/non-RPP true-up reclass entries recorded in 2023 as well as true-up of Dec 2022 GA cost accrual vs actual IESO bill recorded in following month (Jan), record DR adj to 2022 and CR adj to 2023 Workform.	Yes	
1b	CT 148 True-up of GA Charges based on Actual Non-RPP Volumes - current year	$ (27,311)	Nov and Dec 2023 RPP/non-RPP true-up reclass entries recorded in 2024 as well as true-up of Dec 2023 GA cost accrual vs actual IESO bill recorded in following month (Jan), record CR adj to 2023 and DR adj to 2024 Workform.	Yes	
2a	Remove prior year end unbilled to actual revenue differences	$ (258,000)	Relates to the overstatement of the December 2022 unbilled revenue accrual of the prior year. DR adj in 2022 and CR adj in 2023 Workform.	Yes	
2b	Add current year end unbilled to actual revenue differences	$ 20,653	Relates to the overstatement of the December 2023 unbilled revenue accrual of the current year. DR adj in 2023 and CR adj in 2024 Workform.	Yes	
3a	Remove difference between prior year accrual/forecast to actual from long term load transfers				
3b	Add difference between current year accrual/forecast to actual from long term load transfers				
4	Remove GA balances pertaining to Class A customers				
5a	Significant prior period billing adjustments recorded in current year	$ (128,000)	GS>50 prior period (2022 consumption values) billing correction for a customer. Amount is sum of GA related to billing correction of ($74,000), and the reclassification of ($54,000) to 1588 based on CT 148 true-up impact.	No	Billing correction relates to prior period, keep within current year presented for disposition
5b	Significant current period billing adjustments recorded in other year(s)				
6	Differences in GA IESO posted rate and rate charged on IESO invoice	$ 14,000	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 %	No	Keep variance within current year presented for disposition purposes.
7	Class A Global adjustment	$ (113,000)	Timing Class A GA difference included in Net Change in Principal Balance in the GL Balance (2022). DR adjustment	Yes	
8	Class A Global adjustment	$ (36,774)	Timing Class A GA difference included in Net Change in Principal Balance in the GL Balance (2023). CR adjustment	Yes	
9	2023 CT 148 Recalcuated Settlement Adjustment	$ (12,362)	True-up adjustment to be remitted to IESO.	Yes	
10	National Grid GA Billed Differences	$ 549,434	August and September GA Billed Differences between actual posted GA rate and GA billed quantified	No	

Note 6

Adjusted Net Change in Principal Balance in the GL	$	(239,093)
Net Change in Expected GA Balance in the Year Per Analysis	$	(173,177)
Unresolved Difference	$	(65,915)
Unresolved Difference as % of Expected GA Payments to IESO		-0.8%

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Commodity Accounts Analysis Workform

Note 2 **Consumption Data Excluding for Loss Factor (Data to agree with RRR as applicable)**

Year		2024		
Total Metered excluding WMP	C = A+B	489,019,210	kWh	100%
RPP	A	298,826,383	kWh	61.1%
Non-RPP	B = D+E	190,192,826	kWh	38.9%
Non-RPP Class A	D	81,556,923	kWh	16.7%
Non-RPP Class B*	E	108,635,903	kWh	22.2%

*Non-RPP Class B consumption reported in this table is not expected to directly agree with the Non-RPP Class B Including Loss Adjusted Billed Consumption in the GA Analysis of Expected Balance table below. The difference should be equal to the loss factor.

Note 3 **GA Billing Rate**

GA is billed on the 2nd Estimate

Please confirm that the same GA rate is used to bill all customer classes. If not, please provide further details Yes

Please confirm that the GA Rate used for unbilled revenue is the same as the one used for billed revenue in any paticular month No

Note 4 **Analysis of Expected GA Amount**

Year 2024

Calendar Month	Non-RPP Class B Including Loss Factor Billed Consumption (kWh)	Deduct Previous Month Unbilled Loss Adjusted Consumption (kWh)	Add Current Month Unbilled Loss Adjusted Consumption (kWh)	Non-RPP Class B Including Loss Adjusted Consumption, Adjusted for Unbilled (kWh)	GA Rate Billed ($/kWh)	$ Consumption at GA Rate Billed	GA Actual Rate Paid ($/kWh)	$ Consumption at Actual Rate Paid	Expected GA Price Variance ($)
	F	G	H	I = F-G+H	J	K = I*J	L	M = I*L	N=M-K
January	9,747,414			9,747,414	0.05010	$ 488,345	0.04588	$ 447,211	$ (41,134)
February	8,850,938			8,850,938	0.06868	$ 607,882	0.06632	$ 586,994	$ (20,888)
March	8,998,159			8,998,159	0.08310	$ 747,747	0.08171	$ 735,240	$ (12,507)
April	8,620,302			8,620,302	0.06905	$ 595,232	0.07427	$ 640,230	$ 44,998
May	9,187,073			9,187,073	0.07976	$ 732,761	0.07763	$ 713,192	$ (19,568)
June	10,011,831			10,011,831	0.07430	$ 743,879	0.07840	$ 784,928	$ 41,049
July	11,566,943			11,566,943	0.06455	$ 746,646	0.06371	$ 736,930	$ (9,716)
August	11,067,269			11,067,269	0.05375	$ 594,866	0.06323	$ 699,783	$ 104,918
September	9,830,057			9,830,057	0.08669	$ 852,168	0.07928	$ 779,327	$ (72,841)
October	9,222,685			9,222,685	0.06478	$ 597,446	0.07484	$ 690,226	$ 92,780
November	8,593,776			8,593,776	0.08948	$ 768,971	0.08904	$ 765,190	$ (3,781)
December	9,221,421			9,221,421	0.05277	$ 486,614	0.06177	$ 569,607	$ 82,993
Net Change in Expected GA Balance in the Year (i.e. Transactions in the Year)	**114,917,869**	**-**	**-**	**114,917,869**		**$ 7,962,557**		**$ 8,148,858**	**$ 186,301**

Annual Non-RPP Class B Wholesale kWh *	Annual Non-RPP Class B Retail billed kWh	Annual Unaccounted for Energy Loss kWh	Weighted Average GA Actual Rate Paid ($/kWh)**	Expected GA Volume Variance ($)
O	P	Q=O-P	R	P= Q*R
114,455,386	114,917,869	- 462,483	0.07091	$ (32,795)

Equal to (AQEW - Class A + embedded generation kWh)(Non-RPP Class B retail kwh/Total retail Class B kWh)

**Equal to annual Non-RPP Class B $ GA paid (i.e. non-RPP portion of CT 148 on IESO invoice) divided by Non-RPP Class B Wholesale kWh (as quantified in column O in the table above)

Total Expected GA Variance	$ 153,506

Calculated Loss Factor	1.0578
Most Recent Approved Loss Factor for Secondary Metered Customer < 5,000kW	1.0524
Difference	**0.0054**

a) Please provide an explanation in the text box below if columns G and H for unbilled consumption are not used in the table above.

CNPI bills it's customers based on calendar month and has reports available that show a breakdown on consumption billed

b) Please provide an explanation in the text box below if the difference in loss factor is greater than 1%

N/A - within threshold.

Note 5 **Reconciling Items**

	Item	Amount	Explanation	Principal Adjustments	
	Net Change in Principal Balance in the GL (i.e. Transactions in the Year)	$ (58,215)		**Principal Adjustment on DVA Continuity Schedule**	**If "no", please provide an explanation**
1a	CT 148 True-up of GA Charges based on Actual Non-RPP Volumes - prior year	$ 27,311	Nov and Dec 2023 RPP/non-RPP true-up reclass entries recorded in 2024 as well as true-up of Dec 2023 GA cost accrual vs actual IESO bill recorded in following month (Jan), record CR adj to 2023 and DR adj to 2024 Workform.	Yes	
1b	CT 148 True-up of GA Charges based on Actual Non-RPP Volumes - current year	$ 98,022	Nov and Dec 2024 RPP/non-RPP true-up reclass entries recorded in 2024 as well as true-up of Dec 2024 GA cost accrual vs actual IESO bill recorded in following month (Jan), record DR adj to 2024 and CR adj to 2025 Workform.	Yes	
2a	Remove prior year end unbilled to actual revenue differences	$ (20,653)	Relates to the overstatement of the December 2023 unbilled revenue accrual of the current year. DR adj in 2023 and CR adj in 2024 Workform.	Yes	
2b	Add current year end unbilled to actual revenue differences	$ 67,180	Relates to the overstatement of the December 2024 unbilled revenue accrual of the current year. DR adj in 2024 and CR adj in 2025 Workform.	Yes	
3a	Remove difference between prior year accrual/unbilled to actual from load transfers				
3b	Add difference between current year accrual/unbilled to actual from load transfers				
4a	Significant prior period billing adjustments recorded in current year				
4b	Significant current period billing adjustments recorded in other year(s)				
5	CT 2148 for prior period corrections				
6	Class A Global Adjustment	$ 36,774	Timing Class A GA difference included in Net Change in Principal Balance in the GL Balance (2023). CR adjustment	Yes	
7	Class A Global Adjustment	$ (13,893)	Timing Class A GA difference included in Net Change in Principal Balance in the GL Balance (2024). CR adjustment	Yes	
8					
9	2024 CT 148 Recalcuated Settlement Adjustment	$ (90,189)	True-up adjustment to be remitted to IESO.	Yes	
10					

Note 6

Adjusted Net Change in Principal Balance in the GL	$	46,336
Net Change in Expected GA Balance in the Year Per Analysis	$	153,506
Unresolved Difference	$	(107,170)
Unresolved Difference as % of Expected GA Payments to IESO		-1.3% Unresolved differences of greater than + or - 1% should be explained

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Account 1588 Reasonability

Note 7 **Account 1588 Reasonability Test**

Year	Account 1588 - RSVA Power			Account 4705 - Power Purchased	Account 1588 as % of Account 4705
	Transactions[1]	Principal Adjustments[2]	Total Activity in Calendar Year		
2023	- 1,858,033	- 1,348,296	- 509,737	40,820,117	1.2%
2024	- 201,883	- 342,342	- 140,479	40,850,854	-0.3%
Cumulative	**- 1,656,178**	**- 1,005,954**	**- 650,216**	**40,850,854**	**-1.6%**

The annual Account 1588 balance relative to cost of power is expected to be small. If it is greater than +/-1%, provide an explanation in the text box below.

Notes

1) The transactions should equal the "Transaction" column in the DVA Continuity Schedule. This is also expected to equal the transactions in the general ledger (excluding transactions relating to the removal of approved disposition amounts as that is shown in a separate column in the DVA Continuity Schedule)

2) Reconciling items and Principal Adjustments reflect the total of Note 7a "Reconciling Items and Principal Adjustments". Reconciling items represent the items that are recorded in the current period but are related to the prior periods. These items are booked in the GL in the appropriate period and as such do not need to be included in the principal adjustments, However, the reconciling items should be excluded for the purpose of the resonability test for Account 1588.

3) Principal adjustments should equal the "Principal Adjustments" column in the DVA Continuity Schedule. Principal adjustments adjust the transactions in the general ledger to the amount that should be requested for disposition.

Reasons for large Account 1588 balance, relative to cost of power purchased

2023
Balance is slightly (0.3%) over the 1% threshold. CNPI has not identified another material reconciling/adjusting item. Given total activity is just slightly outside of the 1% threshold, CNPI respectfully requests that the OER grant approval for disposition of the 1588 balance as presented.

Note 7a **Reconciling Items and Principal Adjustments - complete for each year where Account 1588 as a % of Account 4705 is greater than + / - 1% of that year's cost of power purchased (Note 7, above)**

	Item	Amount	Explanation	Principal Adjustment on DVA Continuity Schedule	If "no", please provide an explanation[1]
1a	CT 148 True-up of GA Charges based on Actual RPP Volumes - prior year	$ (30,000)	Nov and Dec 2022 RPP/non-RPP true-up reclass entries recorded in 2023 as well as true-up of Dec 2022 GA cost accrual vs actual IESO bill recorded in following month (Jan), record DR adj to 2022 and CR adj to 2023 Workform.	Yes	
1b	CT 148 True-up of GA Charges based on Actual RPP Volumes - current year	$ (13,461)	Nov and Dec 2023 RPP/non-RPP true-up reclass entries recorded in 2024 as well as true-up of Dec 2023 GA cost accrual vs actual IESO bill recorded in following month (Jan), record CR adj to 2023 and DR adj to 2024 Workform.	Yes	
2a	CT 1142/142 true-up adjustment based on actual price and volume - prior year	$ (55,000)	Nov and Dec 2022 RPP/non-RPP settlement true-ups recorded and remitted to IESO in 2023 (billed by IESO via CT 142 in 2023), record DR adj to 2022 and CR adj to 2023 Workform.	Yes	
2b	CT 1142/142 true-up adjustment based on actual price and volume - current year	$ 171,708	Nov and Dec 2023 RPP/non-RPP settlement true-ups recorded and remitted to IESO in 2024 (billed by IESO via CT 142 in 2024), record DR adj to 2023 and CR adj to 2024 Workform.	Yes	
3a	Remove prior year end unbilled to actual revenue differences	$ 282,000	Relates to the understatement of the December 2022 unbilled revenue accrual of the prior year. CR adj in 2022 and DR adj in 2023 Workform.	Yes	
3b	Add current year end unbilled to actual revenue differences	$ 104,648	Relates to the overstatement of the December 2023 unbilled revenue accrual of the current year. DR adj in 2023 and CR adj in 2024 Workform.	Yes	
4a	Significant prior period billing adjustments recorded in current year				
4b	Significant current period billing adjustments recorded in other periods				
5	Variance (eg. Variance due to significant understated/overstated line loss factor)				
6	IESO CT 101	$ 1,298,000	IESO CT 101 accrual and billed differences + Correction to a 2022 IESO CT142 submission in 2023.	Yes	
7	2023 CT 148 Recalcuated Settlement	Adjustment	$ (56,204)	True-up adjustment to be remitted to IESO.	Yes	
8	2023 CT 142 Recalcuated Settlement	Adjustment	$ (383,495)	True-up adjustment to be remitted to IESO.	Yes	
9	mFIT/FIT true-up for 2022	$ (30,000)	Sum of accrual vs actual variance in 2022 purchases from microFIT-FIT generators paid in 2023 and settlement with IESO.	Yes	
10	mFIT/FIT true-up for 2023	$ 50,155	Sum of accrual vs actual variance in 2023 purchases from microFIT-FIT generators paid in 2024 and settlement with IESO.	Yes	
	Total Reconciling Items	**$ 1,348,296**			

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Commodity Accounts Analysis Workform - Account 1588 and 1589 Principal Adjustment Reconciliation

Note 8 **Breakdown of principal adjustments included in last approved balance:**

Account 1589 - RSVA Global Adjustment				
	Adjustment Description	Amount	To be reversed in current application?	Explanation if not to be reversed in current application
1	CT 148 true-up of GA based on Actual Non-RPP Volumes - PY	(51,563)	No	'21 Reversed in '22
2	Unbilled to actual revenue differences - PY	7,000	No	'21 reversed in '22
3	Correction of Gananoque RPP Settlement	(261,703)	No	'21 reversed in '22
4	CT 148 true-up of GA Charges based on actual Non-RPP volumes	30,000	Yes	
5	Unbilled to actual revenue differences	258,000	Yes	
6	Unbilled GA Class A revenue accrual and IESO CT 142 accrual	113,000	Yes	
7				
8				
	Total	94,734		
	Total principal adjustments included in last approved balance	94,734		
	Difference	-		

Account 1588 - RSVA Power				
	Adjustment Description	Amount	To be Reversed in Current Application?	Explanation if not to be reversed in current application
1	CT 142/148 True-up of Comm + GA on Actual RPP/Non-RPP Volumes - CY	(53,732)	No	'21 Reversed in '22
2	Unbilled to actual revenue differences - CY	(96,000)	No	'21 Reversed in '22
3	microFIT/FIT true-up - CY	80,472	No	'21 Reversed in '22
4	CT 148 true-up of GA Charges based on actual RPP volumes	30,000	Yes	
5	CT 1142/142 true-up based on actuals	55,000	Yes	
6	Unbilled to actual revenue differences	(282,000)	Yes	
7	microFIT/FIT true-up - CY	20,000	Yes	
8	IESO CT 101 accrual and billed differences + Correction to a 2022 IESO CT142	(1,298,000)	Yes	
	Total	(1,544,260)		
	Total principal adjustments included in last approved balance	(1,544,260)		
	Difference	-		

Note 9 **Principal adjustment reconciliation in current application:**

Notes

1) The "Transaction" column in the DVA Continuity Schedule is to equal the transactions in the general ledger (excluding transactions relating to the removal of approved disposition amounts as that is shown in a separate column in the DVA Continuity Schedule)
2) Any principal adjustments needed to adjust the transactions in the general ledger to the amount that should be requested for disposition should be shown separately in the "Principal Adjustments" column of the DVA Continuity Schedule
3) The "Variance RRR vs. 2024 Balance" column in the DVA Continuity Schedule should equal principal adjustments made in the current disposition period. It should not be impacted by reversals from prior year approved principal adjustments.
4) Principal adjustments to the pro-ration of CT 148 true-ups (i.e. principal adjustment #1 in tables below) are expected to be equal and offsetting between Account 1588 and Account 1589, if not, please explain. If this results in further adjustments to RPP settlements, this should be shown separately as a principal adjustment to CT 1142/142 (i.e. principal adjustment #2 in tables below)

Complete the table below for the current disposition period. Complete a table for each year included in the balance under review in this rate application. The number of tables to be completed is automatically generated based on data provided in the Information Sheet

	Account 1589 - RSVA Global Adjustment			
Year		Adjustment Description	Amount	Year Recorded in GL
2023	*Reversals of prior approved principal adjustments (auto-populated from table above)*			
	1			
	2			
	3			
	4	CT 148 true-up of GA Charges based on actual Non-RPP volumes	(30,000)	2023
	5	Unbilled to actual revenue differences	(258,000)	2023
	6	Unbilled GA Class A revenue accrual and IESO CT 142 accrual	(113,000)	2023
	7			
	8			
		Total Reversal Principal Adjustments	(401,000)	
2023	*Current year principal adjustments*			
	1	CT 148 true-up of GA Charges based on actual Non-RPP volumes	(27,311)	2024
	2	Unbilled to actual revenue differences	20,653	2024
	3	Elimination of timing differences included in Dec 23 balance of 1589	(36,774)	2024
	4	CT 148 recalculated settlement true up 2023	(12,362)	2025
	5			
	6			
	7			
	8			
		Total Current Year Principal Adjustments	(55,795)	
		Total Principal Adjustments to be Included on DVA Continuity Schedule/Tab 3 - IRM Rate Generator Model	(456,795)	

	Account 1588 - RSVA Power			
Year		Adjustment Description	Amount	Year Recorded in GL
2023	*Reversals of prior approved principal adjustments (auto-populated from table above)*			
	1			
	2			
	3			
	4	CT 148 true-up of GA Charges based on actual RPP volumes	(30,000)	2,023
	5	CT 1142/142 true-up based on actuals	(55,000)	2,023
	6	Unbilled to actual revenue differences	282,000	2,023
	7	microFIT/FIT true-up - CY	(20,000)	2,023
	8	IESO CT 101 accrual and billed differences + Correction to a 2022 IESO CT142	1,298,000	2,023
		Total Reversal Principal Adjustments	1,475,000	
2023	*Current year principal adjustments*			
	1	CT 148 true-up of GA Charges based on actual RPP volumes	(13,461)	2,024
	2	CT 1142/142 true-up based on actuals	171,708	2,024
	3	Unbilled to actual revenue differences	104,648	2,024
	4	CT 148 recalculated settlement true-up for 2023	(56,204)	2,025
	5	CT 142 recalculated settlement true up for 2023	(383,495)	2,025
	6	2023 accrued energy purchases from mFIT/FIT generators paid in 2024	41,101	2,024
	7	mFIT/FIT true-up for Dec 2023 - CY	9,000	2,024
	8			
		Total Current Year Principal Adjustments	(126,704)	
		Total Principal Adjustments to be Included on DVA Continuity Schedule/Tab 3 - IRM Rate Generator Model	1,348,296	

	Account 1589 - RSVA Global Adjustment			
Year		Adjustment Description	Amount	Year Recorded in GL
2024	*Reversals of prior year principal adjustments*			
	1	Reversal of prior year CT-148 true-up of GA Charges based on actual Non-RPP volumes	27,311	2024
	2	Reversal of Unbilled to actual revenue differences	(20,653)	2024
	3	Elimination of timing differences included in Dec 23 balance of 1589	36,774	2024
	4	CT 148 recalculated settlement true up 2023	12,362	2025
	5			
	6			
	7			
	8			
		Total Reversal Principal Adjustments	55,795	
2024	*Current year principal adjustments*			
	1	CT 148 true-up of GA Charges based on actual Non-RPP volumes	98,022	2025
	2	Unbilled to actual revenue differences	67,180	2025
	3	Elimination of timing differences included in Dec 24 balance of 1589	(13,893)	2025
	4	CT 148 recalculated settlement true up 2023	(12,362)	2025
	5	CT 148 recalculated settlement true up 2024	(90,189)	2025
	6			
	7			
	8			
		Total Current Year Principal Adjustments	48,756	
		Total Principal Adjustments to be Included on DVA Continuity Schedule/Tab 3 - IRM Rate Generator Model	104,551	

	Account 1588 - RSVA Power			
Year		Adjustment Description	Amount	Year Recorded in GL
2024	*Reversals of prior year principal adjustments*			
	1	Reversal of CT 148 true-up of GA Charges based on actual RPP volumes	13,461	2,024
	2	Reversal of CT 1142/142 true-up based on actuals	(171,708)	2,024
	3	Reversal of Unbilled to actual revenue differences	(104,648)	2,024
	4	CT 148 recalculated settlement true-up for 2023	56,204	2,025
	5	CT 142 recalculated settlement true up for 2023	383,495	2,025
	6	2023 accrued energy purchases from mFIT/FIT generators paid in 2024	(41,101)	2,024
	7	mFIT/FIT true-up for Dec 2023 - CY	(9,000)	2,024
	8			
		Total Reversal Principal Adjustments	126,704	
2024	*Current year principal adjustments*			
	1	CT 148 true-up of GA Charges based on actual RPP volumes	264,067	2,025
	2	CT 1142/142 true-up based on actuals	(315,343)	2,025
	3	Unbilled to actual revenue differences	(31,130)	2,025
	4	CT 148 recalculated settlement true-up for 2023	(56,204)	2,025
	5	CT 142 recalculated settlement true up for 2023	(383,495)	2,025
	6	CT 148 recalculated settlement true-up for 2024	(369,914)	2,025
	7	CT 142 recalculated settlement true up for 2024	381,255	2,025
	8	mFIT/FIT true-up for 2024 - CY (incl generators paid in 2025)	41,718	2,025
		Total Current Year Principal Adjustments	(469,046)	
		Total Principal Adjustments to be Included on DVA Continuity Schedule/Tab 3 - IRM Rate Generator Model	(342,342)	