



**Lakefront
Utilities
Inc.**

207 Division Street, P.O. Box 577, Cobourg, ON K9A 4L3 • www.lakefrontutilities.com • Tel: 905-372-2193

November 13th, 2025

Sent by: RESS

Ontario Energy Board
2300 Yonge Street, 27th Floor
PO Box 2319
Toronto, ON M4P 1E4

Re:

**EB-2025-0025 - 2026 Incentive Rate Mechanism ('IRM') Application
Lakefront Utilities Inc. – Responses to November 6th, 2025, OEB Staff
Questions**

Attached, please find the responses to the OEB Staff questions received on November 6th, 2025. Also submitted are the following, referenced in the responses:

- Updated IRM Rate Generator Model
- Updated Commodity Analysis Workform
- IESO Settlement Workbook 2024 Annual
- IESO Settlement Workbook 2025 Annual
- 2023 – 2024 DVA Continuity Schedule
- Lakefront Utilities DVA Inspection Report_20250505

If you have any questions or require additional information, please do not hesitate to contact us. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'DW'.

Danielle Wakelin
Manager, Regulatory Affairs & Customer Relations
Lakefront Utilities Inc.



Follow-up Question #1

Ref. 1: IRRs Staff Question-9, a) i

Ref. 2: 2026 Commodity Accounts Analysis Workform_2.0_20251021, Tab GA2024, Note 5

Ref. 3: 2026 IRM Rate Generator Model_20251021, Tab 3, Cell BF29

Preamble:

In Ref. 1, Lakefront Utilities provided the following table to support the credit principal adjustment of \$126,471.45 reported in Account 1589.

	B	T	U	V	W	X	Y	Z	AA	AB
		202409	202410	202410	202411	202411	202412	202412	2024	All
		I19 Input Rev	I18 Input Trueup Sett	I21 Input Rev	I20 Input Trueup Sett	I23 Input Rev	I22 Input Trueup Sett	I25 Input Rev	Total IESO Settlement	Total IESO Settlement
		I19	I20	I21	I22	I23	I24	I25		
RPP Revenue Prices										
RPPT1		\$19,328.57	(\$4,175.60)	(\$10,504.30)	(\$22,856.58)	\$17,405.72	(\$8,611.46)	(\$742.15)	(\$24,986.90)	(\$24,986.90)
RPPT2		\$5,341.30	\$5,283.01	(\$5,148.50)	(\$2,964.45)	(\$1,044.38)	\$3,898.98	(\$4,724.22)	\$4,759.20	\$4,759.20
RPPTOUMID		\$223,888.65	\$19,654.51	(\$33,494.25)	\$3,289.33	\$177,252.32	\$37,474.61	\$76,458.09	\$1,092,178.10	\$1,092,178.10
RPPTOUFF		\$20,107.83	(\$102,313.71)	(\$43,798.43)	(\$224,466.19)	\$13,351.56	(\$177,546.78)	(\$59,585.26)	(\$1,455,147.94)	(\$1,455,147.94)
RPPTUON		(\$47,624.53)	\$107,878.86	(\$110,059.74)	\$60,873.19	(\$53,381.81)	\$104,578.17	(\$90,527.52)	\$257,919.07	\$257,919.07
RPPULOMID		\$71.34	\$24.74	(\$7.25)	\$5.80	\$55.21	\$66.33	\$59.56	\$731.84	\$731.84
RPPULOOF		(\$134.97)	(\$33.36)	(\$165.42)	(\$109.51)	(\$91.01)	(\$76.89)	(\$270.38)	(\$2,289.90)	(\$2,289.90)
RPPULOON		\$34.57	\$175.87	(\$69.34)	\$206.11	\$26.04	\$273.63	(\$100.64)	\$1,909.99	\$1,909.99
RPPULOOVN		\$686.17	(\$636.78)	\$296.67	(\$754.19)	\$729.14	(\$749.35)	\$421.19	(\$1,544.93)	(\$1,544.93)
Total RPP For Settlement		\$221,698.93	\$25,857.54	(\$202,950.56)	(\$186,776.70)	\$154,302.79	(\$40,692.75)	(\$79,011.33)	(\$126,471.45)	(\$126,471.45)

OEB staff notes that the sum of the “Total RPP for Settlement” from columns T to Z in the table above does not reconcile with the 2024 Total IESO Settlement credit \$126,471.45 reported in Column AA. OEB staff further notes that this credit principal adjustment is not reflected in Ref. 2 and Ref. 3.

Question(s):

- Please provide an Excel working file to support the reported credit principal adjustment of \$126,471.45.
- Please clarify why the recovery in CT142 of \$126,471.45 related to RPP true-up settlement is reported in Account 1589 instead of Account 1588.
- Please confirm whether any CT 142 true-up was recorded in Account 1588 for 2024 transactions, and if applicable, provide an Excel working file to support the amount.



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- d) Please provide updated Ref. 2 and Ref. 3 to reflect the applicable principal adjustment reported in the “Principal Adjustment” tab of the 2026 Commodity Analysis Workform for Account 1589.

LUI Response:

Please see Appendix A.

Follow-up Question #2

Ref. 1: 2026 Commodity Accounts Analysis Workform_2.0_20251021, Tab GA2024, Note 6

Preamble:

In Note 6 of the 2026 Commodity Accounts Analysis Workform, the unresolved differences of \$184,196 represent 3.5% of expected GA payments to the IESO, which exceeds the OEB’s reasonability threshold of 1%.

Question(s):

- a) Please provide a detailed explanation for the large unresolved differences reported in Ref. 1.

LUI Response:

Please see Appendix A.

Follow-up Question #3

Ref. 1: 2026 Commodity Accounts Analysis Workform_2.0_20251021, Tab Account 1588, Note 7

Preamble:

In Note 7 of the 2026 Commodity Accounts Analysis Workform, the total 2024 activity of \$509,556 reported in Account 1588 represents 3% of the reported balance of \$16,846,440 in Account 4705, which exceeds the OEB’s reasonability threshold of 1%.

Question(s):



- a) Please provide a detailed explanation for the large Account 1588 balance, relative to cost of power purchased in 2024.

LUI Response:

Please see Appendix A.

Follow-up Question #4

Ref. 1: IRRS Staff Question-10, a) i

Ref. 2: 2026 Commodity Accounts Analysis Workform_2.0_20251021, Tab Account 1588, Note 7, Cell D20

Ref. 3: 2026 IRM Rate Generator Model_20251021, Tab 3, Cell BF28

Preamble:

In Ref. 1, Lakefront Utilities provided the following screenshot of the adjustments required to the principal balance in Account 1588 and 1589 as a result of the OEB audit provided.

		Account 1588	Account 1589
Principal	Revised annual transactions		
	2016	(347,841)	(412,501)
	2017	16,556	261,036
	2018	158,035	(123,556)
	2019	91,275	123,474
	2020	95,666	385,034
	2021	149,079	(308,934)
	2022	238,892	7,677
	2023	175,125	242,454
		Revised Principal Balance as of Dec 31, 2023	576,786
	Balance as of Dec 31, 2023 per GL	171,775	(1,217,915)
	Adjustment Required to Principal Balance	405,011	1,392,598
Interest	Revised Interest Balance as of Dec 31, 2023	46,208	(75,727)
	Balance as of Dec 31, 2023 per GL	11,623	(151,982)
	Adjustment Required to Interest Balance	34,585	76,255
	Total Principal and Interest Adjustments	439,597	1,468,853



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OEB staff notes, the credit principal adjustment of \$405,011, represent the reversal of the adjustment made in 2024 related to the OEB audit of 2016-2023 balances for Account 1588, is not reflected in Ref. 2 and Ref. 3.

The instructions provided in Ref. 1 specify that,

“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.”

Additionally, based on the screenshot provided in Reference 1, OEB staff notes that a debit adjustment of \$1,392,598 was required to the principal balance in Account 1589 as a result of the OEB audit of the 2016-2023 balances for this account.

Question(s):

- a) Please provide updated Ref. 2 and Ref. 3 to reflect the applicable principal adjustment reported in the “Principal Adjustment” tab of the 2026 Commodity Analysis Workform for Account 1588.
- b) Please confirm whether the debit adjustment of \$1,392,598 required to the principal balance in Account 1589, related to the 2016-2023 balances, is recorded in the 2024 GL.
 - i. If yes, please explain why a reversal of the debit adjustment is not recorded in Account 1589.
 - ii. If not, please clarify in which year’s GL the debit adjustment is recorded.

LUI Response:

Please see Appendix A.

Follow-up Question #5

Ref. 1: 2026-IRM-Rate-Generator-Model_Lakefront_20251105, Tabs 18 and 21

Preamble:

On October 17, 2025, the OEB issued a letter regarding updated Regulated Price Plan (RPP) prices effective as of November 1, 2025. Also, effective November 1, 2025, the Ontario Government’s Ontario Electricity Rebate (OER) was changed to 23.5%.

OEB staff has updated Lakefront Utilities’ Rate Generator Model (RGM) with the updated RPP and OER values as follows:



Time-of-Use RPP Prices and Percentages

As of	November 1, 2025		
Off-Peak	\$/kWh	0.0980	64%
Mid-Peak	\$/kWh	0.1570	18%
On-Peak	\$/kWh	0.2030	18%

Ontario Electricity Rebate (OER)

Ontario Electricity Rebate (OER)	\$	23.50%
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Question(s):

- a) Please confirm the accuracy of the Rate Generator Model updates.

LUI Response:

LUI confirms the accuracy of the updated RPP and OER rates as outlined on the OEB website (<https://www.oeb.ca/consumer-information-and-protection/electricity-rates>).

Follow-up Question #6

Ref. 1: 2026-IRM-Rate-Generator-Model_Lakefront_20251105, Tabs 11 and 21

Preamble:

On October 9, 2025, the OEB issued a letter regarding updated 2026 Preliminary Uniform Transmission Rates (UTR) and Hydro One Sub-Transmission Rates (RTSR).

OEB staff has updated Lakefront Utilities' Rate Generator Model (RGM) with the Preliminary UTR and RTSR values as follows:

Uniform Transmission Rates	Unit	2026
Rate Description		Rate
Network Service Rate	kW	\$ 6.42
Line Connection Service Rate	kW	\$ 1.02
Transformation Connection Service Rate	kW	\$ 3.47



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Hydro One Sub-Transmission Rates	Unit	2026
Rate Description		Rate
Network Service Rate	kW	\$ 5.4282
Line Connection Service Rate	kW	\$ 0.6896
Transformation Connection Service Rate	kW	\$ 3.4965
Both Line and Transformation Connection Service Rate	kW	\$ 4.1861

Question(s):

- a) Please confirm the accuracy of the Rate Generator Model updates.

LUI Response:

LUI confirms the accuracy of the updated UTR's and Hydro One Sub-Transmission Rates as outlined in OEB letter sent on October 9th, 2025 (www.rds.oeb.ca/CMWebDrawer/Record/916414/File/document).



Appendix A

Lakefront Utilities Inc. – Consolidated Responses to OEB Staff Questions #1 – #4

Re: 2026 IRM Application – Accounts 1588 and 1589 Principal Adjustments and Variances

1. Introduction and Context

Lakefront Utilities Inc. (LUI) appreciates the OEB staff's detailed review of the 2026 IRM filing and the associated second round of questions regarding the Commodity Accounts Analysis Workform, IRM Rate Generator, and related principal adjustments.

Upon revisiting the 2024 settlement transactions in totality, LUI identified certain differences and reconciliation issues that were **unexpected** at the time of filing. LUI acknowledges these discrepancies and appreciates the opportunity to provide clarification and a more comprehensive reconciliation framework.

2. Background and Contributing Factors

During the review of Accounts 1588 and 1589 for the 2024 reporting year, LUI determined that:

- Some **adjustments and true-up entries** were not recorded consistently between the **general ledger, CT142 settlement data, and the OEB reporting workforms**.
- The **credit principal adjustment** and **audit-related adjustments** were partially reconciled at the transactional level but were not fully reflected in the 2024 Commodity Accounts Analysis Workform or IRM Rate Generator.

Given these constraints, LUI undertook a **comprehensive reconciliation process** using a validated internal workbook, referenced as "2023 – 2024 DVA Continuity Schedule", to serve as our **source of truth**.

3. Source of Truth and Reconciliation Framework

To ensure accuracy and transparency, LUI has used its **Annual Reconciliation Workbook**, which has been **vetted and accepted by the OEB's Inspection and Enforcement Audit Team**, as the foundation for revalidating 2024 transactions.



This workbook provides:

- A **detailed trace** between IESO settlements (including CT142 and GA data) and general ledger postings;
- A **systematic reconciliation** between Accounts 1588 and 1589 balances, cost of power, and settlement adjustments; and
- Identification of any unresolved variances beyond OEB reasonability thresholds, supported by transactional data.

The reconciled results from this workbook will be provided as supporting evidence in Excel format.

The following simplistic reconciliation, as found in our workbook “2023 – 2024 DVA Continuity Schedule” on worksheet “Reconciliation,” will support LUI's conclusion as to the positions for Accounts 1588 and 1589 as of December 31, 2024. LUI concludes that the GL principal balances were overstated by \$295,805 for 1588 and \$110,623 for 1589. The interest values were also overstated.

This reconciliation begins with the original 2023 GL closing balance as per the 2023 RRR and I&E summary. LUI then records the I&E directed adjustments, creating the adjusted closing Balance for 2023. In LUI's submission it includes an annual reconciliation supporting the principal transaction for 2024. LUI has submitted the workbook “IESO RPP Settlement Workbook 2024 Annual” to support this calculation. See worksheets “Rec1 1588 Commodity” and “Rec2 1589 Class B”. This workbook is the same workbook presented to I&E for consideration in our reconciliation 2016-2023. The workbook also supports the interest calculation for 2024.

The resulting differences between the 2024 RRR and as calculated are to be reported in LUI 2025 transactions.

The result of this concludes that the Unrealized Difference as a % of Expected GA Payments to IESO of 0.5% below the 1% threshold.



Table 1: Reconciliation from “2023 – 2024 DVA Continuity Schedule.xlsx”

	1588					1589				
	Principal	Interest	Total	OEB RRR	Diff	Principal	Interest	Total	OEB RRR	Diff
2023 GL Closing Balance	171,775	11,623	183,398	183,398	0	(1,217,915)	(175,568)	(1,393,483)	(1,395,575)	(2,091)
I & E Adjustment Required	405,011	34,585	439,596			1,392,598	76,255	1,468,853		
Adjusted Closing Balance 2023	576,786	46,208	622,994			174,683	(99,313)	75,370		
2024 Transactions	213,751	35,333	249,084			400,456	14,317	414,772		
Closing Balance 2024	790,537	81,541	872,078	1,180,708	308,631	575,139	(84,997)	490,142	599,969	109,827
2024 GL Closing Balance	1,086,342	94,366	1,180,708			685,762	(70,066)	615,696		
Required Adjustment	(295,805)	(12,825)	(308,631)			(110,623)	(14,931)	(125,554)		(15,727)

Table 2: I&E Summary from “Lakefront Utilities DVA Inspection Report_20250505.pdf”

APPENDIX 1
SUMMARY OF ADJUSTMENTS TO BALANCES AS OF
DECEMBER 31, 2023

		Account 1588	Account 1589
Principal	Revised annual transactions		
	2016	(347,841)	(412,501)
	2017	16,556	261,036
	2018	158,035	(123,556)
	2019	91,275	123,474
	2020	95,666	385,034
	2021	149,079	(308,934)
	2022	238,892	7,677
	2023	175,125	242,454
		Revised Principal Balance as of Dec 31, 2023	576,786
	Balance as of Dec 31, 2023 per GL	171,775	(1,217,915)
	Adjustment Required to Principal Balance	405,011	1,392,598
Interest	Revised Interest Balance as of Dec 31, 2023	46,208	(75,727)
	Balance as of Dec 31, 2023 per GL	11,623	(151,982)
	Adjustment Required to Interest Balance	34,585	76,255
	Total Principal and Interest Adjustments	439,597	1,468,853



Table 3: 1588 Reconciliation from “Rec1 1588 Commodity” in “IESO RPP Settlement Workbook 2024 Annual.xlsm”

Lakefront Utilities Inc. 2024 1588 Commodity RSVA Commodity											Interest Calculation				
	4006-4055			4795				1588			Variance Balance	Interest Rate	Interest Applied	Interest	
	GL Revenue	Unbilled	Total Revenue	Energy Cost (code 10)	RPP GA (code 148)	IESO RPP Settlement	FIT/MFIT	Total Cost	Variance	Y.T.D.					G.L. Balance
Opening Balance															
1 January	-1,795,209.54		551,252.12	997,395.03		265,138.47	6,332.29	1,820,137.92	24,928.36	24,928.36	24,928.36	601,714.42	5.49%	2,638.84	48,844.86
2 February	-1,411,459.42		563,195.17	963,195.17		160,483.35	10,824.57	1,425,654.32	13,996.90	38,925.25	38,925.25	615,711.31	5.49%	2,752.84	51,599.70
3 March	-1,382,291.77		573,567.97	822,925.55		-18,325.12	15,542.01	1,393,760.81	11,409.04	50,334.36	50,334.36	627,120.36	5.49%	2,616.86	54,418.58
4 April	-1,271,979.18		949,955.76	711,259.21		68,472.40	14,425.49	1,344,112.85	72,131.68	122,467.97	122,467.97	699,254.03	5.49%	2,899.08	57,285.05
5 May	-1,217,117.47		512,964.14	644,899.58		48,508.95	25,929.14	1,232,802.21	15,184.75	137,652.72	137,652.72	714,438.78	5.49%	3,199.09	60,484.74
6 June	-1,364,420.94		608,566.81	727,979.62		14,962.40	27,896.17	1,379,425.02	15,004.08	152,656.80	152,656.80	729,442.89	5.49%	3,268.56	63,751.30
7 July	-1,724,704.68		841,940.01	732,120.41		130,042.83	34,760.32	1,718,923.08	14,936.48	166,855.21	166,855.21	741,641.27	5.20%	3,160.92	66,914.22
8 August	-1,594,366.37		807,260.37	687,773.39		87,810.04	31,377.00	1,594,221.40	-144.97	166,710.24	166,710.24	3,222.45	5.20%	3,222.45	70,136.66
9 September	-1,326,652.55		604,221.56	688,824.97		-2,904.23	21,801.82	1,311,764.14	-14,908.42	151,801.82	151,801.82	728,577.88	5.20%	3,212.82	71,358.48
10 October	-1,216,823.57		636,684.34	648,915.38		25,877.54	18,413.66	1,329,790.92	13,807.25	164,809.17	164,809.17	741,615.23	4.40%	2,673.82	76,012.40
11 November	-1,233,006.99		591,718.79	837,633.64		-186,776.70	6,683.49	1,250,645.22	17,638.24	182,487.41	182,487.41	759,273.47	4.40%	2,721.80	78,754.20
12 December	-1,527,205.89		844,612.18	748,602.80		-40,692.75	5,947.21	1,558,469.43	33,263.74	213,751.15	213,751.15	790,537.21	4.40%	2,786.53	81,540.73
13	0.00	0.00	-17,485,458.18	8,112,887.17	8,472,766.70	552,618.69	221,738.77	17,179,269.33	213,751.15						35,823.67

Table 4: 1588 Reconciliation from “Rec1 1588 Commodity” in “IESO RPP Settlement Workbook 2024 Annual.xlsm”

Lakefront Utilities Inc. 2024 1589 Class B RSVA Global Adjustment Class B Only											Interest Calculation				
	4006-4055			4707				1589			Variance Balance	Interest Rate	Interest Applied	Interest	
	Revenue - Class B only	Unbilled	Total Revenue	IESO Code 148	RPP GA (code 148)	Class B GA (Code 148)	Class B Deferral	Misc	Class B GA	Variance					Y.T.D.
Opening Balance															
1 January	-355,921.03		857,975.93	-551,252.12	306,723.81			306,723.81	-48,197.22	-49,197.22	-49,197.22	174,683.17	5.49%	799.18	(99,131.38)
2 February	-510,460.47		1,093,524.51	-691,153.23	402,771.28			402,771.28	-107,629.19	-106,826.41	-106,826.41	17,056.76	5.49%	574.10	(97,561.12)
3 March	-510,519.91		1,332,977.94	-822,915.95	510,062.01			510,062.01	-457.90	-157,284.31	-157,284.31	17,398.86	5.49%	81.69	(97,778.81)
4 April	-501,589.14		1,105,649.29	-711,259.21	394,190.08			394,190.08	-107,199.06	-264,483.37	-264,483.37	(89,800.20)	5.49%	79.60	(97,778.81)
5 May	-777,587.95		1,121,530.65	-644,899.98	476,630.67			476,630.67	199,042.72	-65,440.65	-65,440.65	109,242.52	5.49%	(410.84)	(98,189.65)
6 June	-291,741.66		1,234,649.01	-727,979.62	506,869.39			506,869.39	215,127.71	149,687.08	149,687.08	324,370.25	5.49%	499.79	(97,689.86)
7 July	-326,033.46		1,151,614.66	-732,170.41	459,444.25			459,444.25	133,410.79	283,097.87	283,097.87	457,781.04	5.20%	1,405.60	(96,284.28)
8 August	-366,332.30		1,108,616.17	-667,779.39	440,842.78			440,842.78	74,510.48	357,608.35	357,608.35	532,291.52	5.20%	1,983.72	(94,300.34)
9 September	-407,811.28		1,199,869.99	-688,824.97	511,045.02			511,045.02	103,233.74	440,842.09	440,842.09	633,525.26	5.20%	2,306.60	(91,951.94)
10 October	-494,772.39		1,102,798.09	-648,915.18	453,882.71			453,882.71	-46,889.68	419,952.41	419,952.41	594,615.58	4.40%	2,182.31	(89,611.57)
11 November	-459,261.86		1,178,061.68	-837,039.64	541,042.04			541,042.04	81,780.18	501,732.58	501,732.58	676,415.75	4.40%	2,182.31	(87,479.25)
12 December	-494,175.48		1,141,701.37	-748,602.80	393,098.57		0.00	393,098.57	-101,276.90	400,455.68	400,455.68	575,138.85	4.40%	2,482.45	(84,996.81)
13	0.00	0.00	-4,996,346.93	33,699,569.31	-8,472,766.70	5,396,802.61	0.00	5,396,802.61	400,455.68						14,816.57

Table 5: GA Reconciliation from Rev3 GA Analysis from “IESO RPP Settlement Workbook 2024 Annual.xlsm”

Item	Applicability of Reconciling Item (Y/N)	Amount (Quantify if it is a significant reconciling item)	Explanation
Net Change in Principal Balance in the GL (i.e. Transactions in the Year)		\$ 400,456	
1a Remove impacts to GA from prior year RPP Settlement true up process that are booked in current year	N		
1b Add impacts to GA from current year RPP Settlement true up process that are booked in subsequent year	N		
2a Remove prior year end unbilled to actual revenue differences	N		
2b Add current year end unbilled to actual revenue differences	N		
3a Remove difference between prior year accrual to forecast from long term load transfers	N		
3b Add difference between current year accrual to forecast from long term load transfers	N		
4 Remove GA balances pertaining to Class A customers	N		
5 Significant prior period billing adjustments included in current year GL balance but would not be included in the billing consumption used in the GA Analysis	N		
6 Differences in GA IESO posted rate and rate charged on IESO invoice	N		
7		\$ -	
8			
9			
10			
Adjusted Net Change in Principal Balance in the GL		\$ 400,456	
Net Change in Expected GA Balance in the Year Per Analysis		\$ 375,367	
Unresolved Difference		\$ 25,088	
Unresolved Difference as % of Expected GA Payments to IESO		0.5%	



4. Corrective Actions and Process Improvement

As part of this review, LUI has taken the following corrective steps:

1. Reconciled all 2024 commodity transactions within the Annual Reconciliation Workbook to validate principal adjustments and true ups.
2. Updated internal procedures to ensure that principal adjustments are consistently reflected in both the Commodity Accounts Analysis Workform and IRM Rate Generator going forward.
3. Implemented a revised Account 1589 settlement process for 2025, whereby:
 - ✓ The **actual GA charge** is now used in place of the **first estimate** when recording monthly transactions as of February 2025.
 - ✓ This change **eliminates timing and estimation discrepancies** that previously contributed to year-end variances.

The 2025 transactions to date are presented below to demonstrate that these process improvements are effectively eliminating differences moving forward.

Table 6: Analysis of Expected GA Amount from Rev3 GA Analysis from “IESO RPP Settlement Workbook 2025 Annual.xlsm”

Note 4 Analysis of Expected GA Amount									
Year									
2025									
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 Variance (\$)
	F	G	H	I = F-G+H	J	K = I*J	L	M = I*L	=M-K
January	6,815,343			6,815,343		0.0837 \$ 570,166	0.0411 \$	280,042	\$ 290,124
February	5,986,234			5,986,234		0.0030 \$ 18,052	0.0030 \$	17,959	\$ 93
March	6,152,795			6,152,795		0.0694 \$ 427,227	0.0695 \$	427,496	\$ 269
April	5,578,652			5,578,652		0.0691 \$ 385,684	0.0692 \$	385,764	\$ 80
May	5,637,907			5,637,907		0.1348 \$ 760,789	0.1348 \$	760,723	\$ 67
June	5,990,732			5,990,732		0.0597 \$ 357,789	0.0597 \$	357,767	\$ 23
July	-			-		0.0000 \$ -	0.0000 \$	-	\$ -
August	-			-		0.0000 \$ -	0.0000 \$	-	\$ -
September	-			-		0.0000 \$ -	0.0000 \$	-	\$ -
October	-			-		0.0000 \$ -	0.0000 \$	-	\$ -
November	-			-		0.0000 \$ -	0.0000 \$	-	\$ -
December	-			-		0.0000 \$ -	0.0000 \$	-	\$ -
Net Change in Expected GA Balance in the Year (i.e. Transactions in the Year)	36,161,664			36,161,664		\$ 2,519,708		\$ 2,229,751	\$ 289,957

5. Conclusion

LUI acknowledges the reconciliation discrepancies identified through OEB staff’s review and has addressed them comprehensively using a validated, audit-approved reconciliation framework. The updated data and methodology confirm that:

- The 2024 balances in Accounts 1588 and 1589 are now reconciled to source settlement data.
- The principal adjustments will be updated in the Commodity Analysis Workform and Rate Generator; and



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- The revised 2025 process will ensure future compliance with OEB expectations and materially eliminate timing-related discrepancies.

LUI respectfully submits this consolidated response to OEB Staff questions #1 through #4 and supporting reconciliation workbook as evidence of the utility's corrective approach and commitment to ongoing accuracy in RPP settlement accounting.