

1 **RESPONSES TO ONTARIO ENERGY BOARD STAFF**
2 **INTERROGATORIES**

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4 **INTERROGATORY 8-STAFF-45**

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6 Ref. 1: Exhibit 8, p.11

7 Ref. 2: RTSR Workform

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9 Preamble: The RTSR Workform includes EV-specific rate classes and an EV multiplier (0.17),
10 suggesting that Entegrus Powerlines has made assumptions for EV-related load forecasting.
11 Entegrus Powerlines' RTSR Workform includes EV-specific rate classes and an EV multiplier,
12 suggesting that EV load has been considered in the forecast. However, the application does not
13 indicate whether Entegrus Powerlines tracks the actual number of customer-owned EVs in its service
14 territory.

15
16 Question(s):

17 (a) Please confirm whether hybrid or plug-in hybrid vehicles are included in the EV forecast.

18 (b) Does Entegrus Powerlines currently track the actual number of customer-owned electric vehicles
19 in its service territory?

20 (c) If not, please explain how EV-related load was estimated and whether Entegrus Powerlines plans
21 to implement tracking in future years.

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23
24 **RESPONSE:**

25 On March 31, 2025, the OEB released updated guidelines and a revised RTSR model for 2026 Rate
26 Applications (2026_RTSR_Workform_1.0_EV). These guidelines introduced a new RTSR rate
27 specifically for qualifying electric vehicle charging stations, as part of the Electric Vehicle
28 Integration Initiative. EPI utilized the new RTSR form, however, EPI has not identified any
29 customers that may be eligible for EV charging station-specific RTSRs.

- 30 a) EPI does not have a specific EV forecast. EPI's service territory has experienced slower EV
31 adoption than anticipated at the provincial level which is consistent with EPI's Public

1 Awareness of Electrical Safety survey with Innovative Research, as described in Exhibit 1,
2 Section 1.7.3.

3 b) and c) Please see the response at 2-Staff-9.

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**RESPONSES TO ONTARIO ENERGY BOARD STAFF
 INTERROGATORIES**

INTERROGATORY 8-STAFF-46

Rate Design Methodology for GS > 50 kW

Ref: Exhibit 8, 8.1.2, Table 8-4, p. 8

Preamble:

Entegrus Powerlines proposes to hold GS > 50 kW fixed charges at the cost allocation ceiling and apply the remaining revenue requirement to the variable charge. The application does not describe the methodology used to calculate the variable charge, including billing determinants and adjustments for transformer ownership allowance.

Question(s):

(a) Please provide the detailed methodology used to calculate the GS > 50 kW variable charge, including billing determinants and any adjustments for transformer ownership allowance.

(b) Confirm whether the same methodology was applied to the Large Use rate class.

RESPONSE:

(a) The variable distribution charge is calculated by dividing the variable distribution portion of the base revenue requirement by the appropriate 2026 Test Year billing determinants. Please see Exhibit 8, Table 8-7 which has also been provided below.

TABLE 8-7: EPI PROPOSED VARIABLE CHARGE BY RATE CLASS

Line No.	Rate Class	Total Distribution Revenue Requirement	Fixed Revenue	Variable Revenue	Transformer Ownership Allowance	Adjusted Variable Revenue	Unit	Billing Determinants	Proposed Variable Charge
1	Residential	\$ 25,596,922	\$ 25,596,922	\$ -		\$ -	kWh	448,377,107	\$ -
2	General Service < 50 kW	\$ 5,721,314	\$ 2,791,986	\$ 2,929,328		\$ 2,929,328	kWh	162,071,320	\$ 0.0181
3	General Service > 50 - 4,999 kW	\$ 6,904,364	\$ 693,757	\$ 6,210,607	\$ 424,857	\$ 6,635,464	kW	1,362,478	\$ 4.8701
4	Large Use	\$ 813,244	\$ 89,623	\$ 723,621	\$ 189,014	\$ 912,635	kW	315,023	\$ 2.8970
5	Unmetered Scattered Load	\$ 33,787	\$ 26,601	\$ 7,186		\$ 7,186	kWh	1,209,325	\$ 0.0059
6	Sentinel Lighting	\$ 33,055	\$ 32,242	\$ 813		\$ 813	kW	798	\$ 1.0185
7	Street Lighting	\$ 412,616	\$ 402,878	\$ 9,738		\$ 9,738	kW	15,619	\$ 0.6235
8	Total	\$ 39,515,303	\$ 29,634,009	\$ 9,881,293	\$ 613,870	\$ 10,495,164			

(b) Confirmed.

1 **RESPONSES TO ONTARIO ENERGY BOARD STAFF**
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4 **INTERROGATORY 8-STAFF-47**

5
6 Low Voltage Rates

7 Ref: Exhibit 8, 8.3.3, Table 8-15, p. 16

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9 Preamble:

10 Entegrus Powerlines is proposing to harmonize Low Voltage (LV) rates across its service territory.

11
12 Question(s):

13 (a) Please explain the rationale for harmonizing LV rates given that the STT zone was not previously
14 subject to LV charges.

15 (b) Please confirm whether any customer impact analysis was performed for STT customers now
16 subject to LV charges.

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19 **RESPONSE:**

20 (a) EPI is proposing to harmonize rates consistent with customer feedback¹ and the OEB
21 MAADs policy that is applicable to the Entegrus/St. Thomas transaction². Currently, while
22 every Entegrus-Main customer pays LV rates, not every Entegrus-Main customer
23 contributes to the incurrence of LV charges (dependent upon how the supply to each of the
24 16 Entegrus-Main communities is configured). This principle will remain consistent post-
25 harmonization, and all EPI customers in all 17 communities will share in LV costs on the
26 same basis. Maintaining 17 different rate zones is clearly not practical or efficient. Rather,
27 this is reflective of the underlying principle of postage-stamp rates under which most

¹ EB-2025-0044 Application and Evidence, Exhibit 1, Section 1.7.3.

² January 19, 2016 OEB Handbook to Electricity Distributor and Transmitter Consolidations, Future Rate Structures states “A consolidated entity is expected to propose rate structures and rate harmonization plans following consolidation at the time it files its rebasing application.”

1 regulated rates operate; that any rate class charge is the same anywhere on the
2 interconnected system regardless of where a given customer is geographically located.
3 While some customers (now and in the future) may pay LV charges without utilizing LV-
4 impacted service, those same customers may incur other costs on the system in excess of
5 their revenue contributions to such cost centres; shortfalls which will be carried by the
6 broader rate class.

7
8 (b) EPI analyzed the bill impacts of harmonized rates but did not complete any specific analysis
9 on extending LV rates to the Entegrus-St. Thomas rate zone, as excluding LV charges from
10 Entegrus-St. Thomas customers would require the maintenance of the Entegrus-St. Thomas
11 rate zone in EPI's customer and billing systems; negating a key benefit of rate
12 harmonization.

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1 **RESPONSES TO ONTARIO ENERGY BOARD STAFF**
2 **INTERROGATORIES**

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4 **INTERROGATORY 8-STAFF-48**

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6 Ref: Exhibit 8, 8.6.2, pp. 20-21

7
8 Preamble:

9 Entegrus Powerlines propose to eliminate several Specific Service Charges (SSCs) that were
10 previously approved for the STT rate zone.

11
12 Question(s):

13 (a) Please confirm whether any of the eliminated SSCs were billed in the past three years to
14 customers within the STT rate zone.

15 (b) Please provide the estimated revenue impact of eliminating these charges.

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18 **RESPONSE:**

19 (a) In the past three years, the Entegrus-STT rate zone has not billed any customers the
20 following charges:

- 21 - Pulling post dated cheques - \$15.00,
22 - Request for other billing information - \$15.00,
23 - Income Tax Letter - \$15.00,
24 - Account History - \$15.00,
25 - Credit Reference/Credit Check (plus credit agency costs) - \$15.00,
26 - Charge to certify cheque - \$15.00,
27 - Duplicate invoices for previous billing - \$ 15.00,

:

- 1 - Notification charge - \$15.00,
 - 2 - Legal Letter Change - \$15.00, and
 - 3 - Special Meter Reads - \$30.00.
- 4 (b) There is no revenue impact due to eliminating these charges.

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**RESPONSES TO SCHOOL ENERGY COALITION
 INTERROGATORIES**

INTERROGATORY 8-SEC-38

[Exhibit 8, Table 8-4]

Please show how Entegrus determined the blended fixed charges shown in Table 8-4.

RESPONSE:

Please see the table below.

Line No.	Rate Class	Entegrus-Main 2023 Customers/ Connections (a)	Entegrus-STT 2023 Customers/ Connections (b)	Total 2023 Customers/ Connections (c)	Entegrus-Main 2025 Approved (d)	Entegrus-STT 2025 Approved (e)	2025 Approved Blended Monthly Charge (f = a/c*d + b/c*e)
1	General Service < 50 kW	4,062	1,813	5,875	\$ 37.73	\$ 29.62	\$ 35.23
2	General Service > 50 - 4,999 kW	383	124	507	\$ 122.36	\$ 92.31	\$ 115.01
3	Large Use	4	-	4	\$ 1,867.15	\$ -	\$ 1,867.15
4	Unmetered Scattered Load	224	-	224	\$ 10.09	\$ -	\$ 10.09

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1 **RESPONSES TO SCHOOL ENERGY COALITION**
2 **INTERROGATORIES**

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4 **INTERROGATORY 8-SEC-39**

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7 [Exhibit 8, p.22]

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9 What amount has been included in contributed capital to replace the two charges detailed on page
10 22.

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14 **RESPONSE:**

15 Please see the response at 8-VECC-43 part c).
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1 **RESPONSES TO SCHOOL ENERGY COALITION**
2 **INTERROGATORIES**

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4 **INTERROGATORY 8-SEC-40**

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7 [Exhibit 8, p.33] The application states that “there are no former Entegrus-STT rate zone
8 customers that will be migrating to the ...Unmetered Scattered Load rate classes which will now
9 apply in this service territory”.

- 10
11 a. Is every load in the STT rate zone metered? If not, then how are these loads billed?
12 b. If every load is metered, has Entegrus examined what the difference in the bill would be for loads
13 that normally would be unmetered, e.g. traffic lights or telecom connections if moved to the
14 Unmetered Scattered Load rate class?

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18 **RESPONSE:**

- 19 a. Not every load in the Entegrus-STT rate zone is metered. The Entegrus-STT rate zone has
20 two unmetered rate classes: Sentinel and Street Lighting.
21 b. N/A

1 **RESPONSES TO VULNERABLE ENERGY CONSUMERS**
2 **COALITION INTERROGATORIES**

3
4 **INTERROGATORY 8.0-VECC-41**

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6 Reference: Exhibit 8, pages 11-13
7 RTSR Workform

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9 a) With respect to the RTSR Workform, please confirm that the RRR data used in Tab 3 and the
10 billing data used in Tab 5 are both based on the same year.
11 b) Please provide a schedule (in Excel) that sets out the calculation of the 2025 weighted average
12 Network and Connection RTSRs set out in Tables 8-10 and 8-11 respectively.
13 c) On October 9, 2025 the OEB has issued a letter which provides the calculations for 2026
14 preliminary Uniform Transmission Rates. On August 29, 2025 HONI filed an application (EB-
15 2025-0030) for approval of its 2026 distribution rates. Please update EPI's RTSR Workform using
16 the 2026 rates as set out in these references.

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20 **RESPONSE:**

- 21 a) Confirmed.
22 b) Please see the live excel file EPI_IRR_7-VECC-41_RTSR 2025 Average Rate
23 Calculation_20251126.
24 c) Please see the live excel file EPI_IRR_2026_RTSR_Workform_1.0_20251126.

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1 **RESPONSES TO VULNERABLE ENERGY CONSUMERS**
2 **COALITION INTERROGATORIES**

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4 **INTERROGATORY 8.0-VECC-42**

5 Reference: Exhibit 8, page 15

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7 Preamble:

8 The Application states:

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10 “EPI proposes using the 2025 estimated HONI LV charges as the basis for the proposed 2026 rates.
11 Table 8-14 below shows the calculation of the estimated 2025 LV charges. This estimate is based
12 on the application of 2024 billing units charged by HONI to the approved HONI 2025 LV rates (EB-
13 2024-0032).”

14
15 a) On August 29, 2025 HONI filed an application (EB-2025-0030) for approval of its 2026
16 distribution rates. Please update EPI’s proposed 2026 LV rates using HONI’s proposed 2026 rates.

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20 **RESPONSE:**

21 a) Please see the table below. The 2026 LV forecast has also been updated in the live excel file
22 EPI_IRR_2026_RTISR_Workform_1.0_20251126.

Line No.	Description	2024 Annual Billing Determinants	2026 Proposed Rates (EB-2025-0030)	2026 Forecast LV Charges
1	Meter Charge	36	\$417.59	\$ 15,033
2	Service Charge	277	\$824.28	\$ 228,326
3	Specific ST Lines	4	\$711.9546	\$ 2,777
4	Common ST Lines	867,199.48	\$1.8229	\$ 1,580,818
5	High Voltage	181,307.25	\$3.6154	\$ 655,498
6	Low Voltage	91,663.04	\$2.2187	\$ 203,373
7	Total			\$ 2,685,824

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1 **RESPONSES TO VULNERABLE ENERGY CONSUMERS**
2 **COALITION INTERROGATORIES**

3
4 **INTERROGATORY 8.0-VECC-43**

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6 Reference: Exhibit 8, page 22

7
8 a) With respect to Entegrus-Main’s current charge for Switching for Company Maintenance based
9 on Time & Materials:

10 a. What were the revenues in 2023 and 2024?

11 b. What is the forecast revenue for 2026 based on now applying the charge across both rates
12 zones?

13 c. How are these revenues reflected in the Application?

14
15 b) With respect to the STT rate zone’s previously approved charge for a “Disconnect/Reconnect at
16 customer’s request - at meter during regular hours” of \$65.00:

17 a. What were the revenues in 2023 and 2024?

18 b. What are the forecast revenues for 2026 based on now applying the charge across both
19 rates zones?

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21
22 c) With respect to the Entegrus-Main rate zone’s previously approved charges for a “Temporary
23 Service install and remove - overhead - no transformer” of \$500.00 and for a “Temporary Service
24 install and remove - overhead - with transformer” of \$1,000.00:

25 a. What were the revenues in 2023 and 2024?

26 b. What is the dollar amount for the “offset” that has been included in 2026 contributed
27 capital?

28
29 **RESPONSE:**

30 a) EPI charges time and materials for “Switching for Company Maintenance”. The time and
31 materials are charged to a billable job and are not reflected in EPI’s OM&A or Capital.
32 Therefore, there are no revenues associated with Switching for Company Maintenance

:

1 reflected in Other Revenue.

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3 b) There is no revenue in 2023 and 2024 for “Disconnect/Reconnect at customer’s request - at
4 meter” in the Entegrus-STT rate zone. Therefore, there were no revenues associated with
5 this charge reflected in Other Revenue. This rate is only applied if a commercial customer
6 needs a simple disconnect or if a residential customer needs a second disconnect in a
7 calendar year (the first one for a residential customer is free of charge). This charge was not
8 applied in 2023 or 2024, and the 2026 forecast is zero.

9

10 c) The revenue for “Temporary Service install and remove - overhead - no transformer” and
11 “Temporary Service install and remove - overhead - with transformer” in 2023 and 2024 are
12 shown below. As outlined in Exhibit 8, Section 8.6.2, EPI proposes to remove these two
13 SSCs from its tariff sheet and instead bill customers based on the actual cost of providing
14 this service. The amount included in contributed capital in 2026 to replace these two charges
15 is approximately \$10k. This figure represents the estimated average annual cost of one
16 temporary service with transformer per year and three temporary services with no
17 transformer.

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Year	Temporary Service – with Transformer	Temporary Service – no Transformer
2023	\$1,000	\$2,500
2024	\$1,000	\$500

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1 **RESPONSES TO VULNERABLE ENERGY CONSUMERS**
2 **COALITION INTERROGATORIES**

3
4 **INTERROGATORY 8.0-VECC-44**

5 Reference: Exhibit 8, page 25

6
7 a) Is the meter reading and/or billing for EPI's microFIT customers performed by a third party?

8
9 i. If yes, how much is EPI charge (per microFIT customer per month) by the 3rd party for
10 this service?

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14 **RESPONSE:**

15 a) The meter reading and billing for EPI's microFIT customers is performed internally.
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1 **RESPONSES TO VULNERABLE ENERGY CONSUMERS**
2 **COALITION INTERROGATORIES**

3
4 **INTERROGATORY 8.0-VECC-45**

5 Reference: Exhibit 8, pages 27-28

6 Chapter 2 Appendices, Appendix 2-R

7
8 a) Please re-do Appendix 2-R where the values in Row K (Supply Facilities Loss Factor) are
9 calculated based on the formula set out in Note K of Appendix 2-R (i.e., Actual Supply Facility Loss
10 Factor as calculated by dividing $(A + C + D)$ by $(B + C + D)$)

11
12
13 **RESPONSE:**

14 a) EPI notes that Appendix 2-R of the OEB's Chapter 2 Appendices does not allow changes to
15 be made to the formulas in Row K. As such, EPI has prepared a copy of Appendix 2-R
16 (included as EPI_IRR_8-VECC-45) that presents the calculation requested.

1 **RESPONSES TO VULNERABLE ENERGY CONSUMERS**
2 **COALITION INTERROGATORIES**

3
4 **INTERROGATORY 8.0-VECC-46**

5 Reference: Exhibit 8, pages 33-34

6 Preamble:

7 The Application states:

8
9 “The full harmonization of all existing rates, rather than the continuation of some or all rate zone
10 separations or the creation of net new rate classes, carries significant efficiency benefits”

11
12 a) Please quantify (in dollars) the annual efficiency benefits attributable to the full harmonization of
13 all existing rates.

14 b) Please demonstrate that these savings have been factored into EPI’s proposed 2026 revenue
15 requirement.

16
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18 **RESPONSE:**

19 a) By “significant efficiency benefits,” EPI refers to enhanced administrative simplicity,
20 transparency, and customer understanding through a unified tariff structure—rather than
21 financial savings. Harmonization alleviates the need to maintain separate rate schedules,
22 which streamlines customer interactions, and eliminates the need to file multiple annual
23 applications. This, in turn, frees up staff time to work on other initiatives.

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25 b) N/A
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