

**Bluewater Power Distribution Corporation
Responses to OEB Staff Questions
EB-2025-0052**

Staff Question-1

Reference 1: Rate Generator Model, Tab 1, Information Sheet

Preamble:

In a letter dated November 21, 2025, Bluewater notified the OEB of a change to the primary contact for the 2026 IRM Application (EB-2025-0052). Accordingly, OEB staff has revised the primary contact's name and email address in Tab 1 of the attached Rate Generator Model.

Question(s):

- a. Please confirm that Tab 1 (Information Schedule) reflects the appropriate details of the primary contact person. If not, please update Tab 1, as necessary.

Response:

Confirmed.

Staff Question-2

Reference 1: Rate Generator Model, Tab 18, Regulatory Charges

Preamble:

On October 17, 2025, the OEB announced changes to electricity prices under the Regulated Price Plan (RPP) for households, small businesses, and farms, effective November 1, 2025. It was also announced that, effective November 1, 2025, the Ontario Government's Ontario Electricity Rebate (OER) will change to 23.5%.

Additionally, on December 11, 2025, the OEB in its Decision and Rate Order EB-2025- 0299 provided updated values for Rural or Remote Electricity Rate Protection Charge (RRRP) and Capacity Based Recovery (CBR) – Applicable for Class B Customers, effective January 1, 2026.

OEB staff has updated the following values in Tab 18 of the attached Rate Generator Model:

- Time-of-Use RPP prices
- Ontario Electricity Rebate
- Rural or Remote Electricity Rate Protection Charge (RRRP)
- Capacity Based Recovery (CBR) – Applicable for Class B Customers

Question(s):

- a. Please confirm that Tab 18 (Regulatory Charges) reflects the appropriate values for the following:
 - Time-of-Use RPP prices and percentages
 - Ontario Electricity Rebate
 - Rural or Remote Electricity Rate Protection Charge (RRRP)
 - Capacity Based Recovery (CBR) – Applicable for Class B Customers

If not, please update Tab 18, as necessary.

Response:

Confirmed.

Staff Question-3

Reference 1: Rate Generator Model, Tab 1, Information Sheet

Reference 2: Rate Generator Model, Tab 3, Continuity Schedule

Preamble:

As per Reference 1, Bluewater indicated that the earliest vintage year in which there is a balance in Account 1595 is 2020. However, OEB staff observes that the accumulated balances in Account 1595 for the years 2020 to 2022 have not been included in Tab 3, Continuity Schedule, of the Rate Generator Model.

Question(s):

- a. Please confirm OEB staff's observation and provide reasons for the exclusion of the accumulated balances in Account 1595 for years 2020 to 2022. Please update the Rate Generator Model, if applicable.

Response:

Bluewater confirms OEB staff observation that the submitted continuity schedule for Account 1595 did not cover the full required period (2020-2022). Bluewater has updated Tab 3 for these accounts in the updated Rate Generator Model submitted with this response.

Staff Question-4

Reference 1: 2026 Application

Reference 2: Rate Generator Model, Tab 3, Continuity Schedule (Cell BU 33)

Preamble:

As per Reference 1, OEB staff observes that Bluewater has not requested the disposition of Account 1595. However, as per Reference 2, Bluewater has indicated “Yes” for the disposition of Account 1595 for year 2021.

Question(s):

- a. Please confirm OEB staff’s observation and provide clarification if the disposition is sought. Please update the Rate Generator Model and/or the Application, if applicable.

Response:

Bluewater confirms it has indicated “yes” for account disposition on Tab 3 for 1595 for year 2021 as doing so is necessary to include this amount in the Total Claim column, along with the other account balances that are also eligible for to be claimed for recovery. The Total Claim amount is then used to automatically calculate the threshold test on Tab 4 of the rate generator model. If Bluewater indicated “no” for account disposition for 1595 for year 2021, the Threshold Test on Tab 4 would be based on an incorrect amount.

For clarity, Bluewater’s total claim of all Group 1 Accounts is \$145,624, including \$31,176 (both numbers updated with this response for Q1 2026 projected interest see Staff Question #6) for account 1595 (2021). However, the total claim does not meet the threshold test and therefore Bluewater is not seeking disposition of any of the Group 1 accounts in this application.

Staff Question-5

Reference 1: Commodity Accounts Analysis Workform 2.0, Tab GA 2024

Preamble:

Under Note 4 – Analysis of Expected GA Amount, Bluewater has not used columns G and H for unbilled consumption. In this case, applicants are requested to provide an explanation in the corresponding text box provided in Tab GA 2024. As per Reference 1, Blue water has not provided this explanation.

Question(s):

- a. Please provide an explanation for not using columns G and H for unbilled consumption in the text box provided in Tab GA 2024 and update the Commodity Accounts Analysis Workform accordingly.

Response:

Bluewater's billing system is able to provide actual consumption on a calendar month basis from its meter read data, and therefore adjustments for unbilled consumption in columns G and H are not necessary.

An updated Commodity Accounts Analysis Workform has been submitted with this response.

Staff Question-6

Reference 1: Rate Generator Model, Tab 3, Continuity Schedule

Preamble:

On December 10, 2025, the OEB published the Q1 2026 prescribed interest rate applicable to the carrying charges of deferral, variance and construction work in progress (CWIP) accounts of natural gas utilities, electricity distributors and other rateregulated entities.

Question(s):

- a. Please update Tab 3 (Continuity Schedule) as necessary to reflect the Q1 2026 OEB-prescribed interest rate of 2.55%.

Response:

Bluewater has updated Tab 3 with the Q1 2026 prescribed interest rate of 2.55%. The updated Rate Generator Model has been submitted with this application.