



January 16, 2026

Registrar
Ontario Energy Board
2300 Yonge Street
Toronto, Ontario M4P 1E4

Dear Mr. Murray, Registrar:

**Re: Orangeville Hydro Limited
Application for 2026 Electricity Distribution Rates – EB-2025-0015
Responses to OEB Staff Questions**

Please find enclosed Orangeville Hydro's responses to OEB Staff Questions received.

An updated excel IRM Rate Generator Model, Commodity Accounts Analysis Workform, and IRM Revenue Cost Ratio Adjustment Model have been included with this submission.

Please contact me if you have any questions on this matter.

Yours truly,

A handwritten signature in black ink that reads "Amy Long".

Amy Long
Chief Financial Officer
Amy.long@orangevillehydro.on.ca
519-942-8000

Orangeville Hydro Limited
EB-2025-0015
January 16, 2026

Please note, Orangeville Hydro Limited (Orangeville Hydro) is responsible for ensuring that all documents it files with the OEB, including responses to OEB staff interrogatories and any other supporting documentation, do not include personal information (as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*), unless filed in accordance with rule 9A of the OEB's *Rules of Practice and Procedure*.

OEB Staff-1

Ref 1: Rate Generator Model, Tab 18- Regulatory Changes

Ref 2: Rate Generator Model, Tab 11- RTSR – UTRs & Sub-Tx

Preamble:

On October 17, 2025, the OEB published the November 1, 2025 to October 31, 2026 Regulated Price Plan Price Report. This included updated Time-of-Use (TOU) prices and Ontario Electricity Rebate.

On October 9, 2025, the OEB published 2026 Preliminary UTRs and Hydro One Proposed Sub-Transmission Rates.

On December 11, 2025, the OEB published 2026 Wholesale Market Services (WMS) and Rural or Remote Electricity Rate Protection (RRRP) charges.

Question(s):

- a) OEB staff has updated Tab 18- Regulatory Charges of the model with the updated TOU prices, Ontario Electricity Rebate, WMS charge and RRRP charge. Please verify the updates and confirm that all tabs linked to Tab 18 reflect the update correctly.

[Response](#)

Orangeville Hydro has verified the updates made by OEB staff and confirms that all tabs linked to Tab 18 reflect the update correctly.

- b) OEB staff has updated Tab 11- RTSR – UTRs & Sub-Tx of the model with the updated UTRs and Sub-Transmission Rates for 2026. Please verify the update and confirm that all tabs linked to Tab 11 reflect the update correctly.

[Response](#)

Orangeville Hydro has verified the updates to the Uniform Transmission Rates made by OEB staff. Orangeville Hydro has updated the Sub-Transmission rates as referenced in the Decision and Rate Order EB-2025-0030 dated December 23, 2025. Orangeville Hydro confirms that all tabs linked to Tab 11 reflect the updates correctly.

OEB Staff-2

Ref 1: Revenue-to-Cost Ratio Adjustment Workform, Sheet 3- Re-Based Bill Det & Rates, Cells E25:E27

Ref 2: EB-2024-0048, Decision and Rate Order, Schedule A, March 20, 2025

Preamble:

The Revenue-to-Cost Ratio Adjustment Workform reflects that fixed metric for the Sentinel Lighting, Street Lighting and Unmetered Scattered Load Rate classes is 'Customers'. However, the current tariff indicates this to be 'Connections'.

Question(s):

- a) Please explain this discrepancy and update the Revenue-to-Cost Ratio Adjustment Workform, as applicable.

[Response](#)

Orangeville Hydro confirms that the fixed metric for the Sentinel Lighting, Street Lighting and Unmetered Scattered Load Rate classes should have been "Connections". The Revenue-to-Cost Ratio Adjustment Workform has been updated.

OEB Staff-3

Ref 1: Revenue-to-Cost Ratio Adjustment Workform, Sheet 3- Re-Based Bill Det & Rates, Cell N27

Ref 2: EB-2024-0048, Decision and Rate Order, Schedule A, March 20, 2025

Preamble:

The Revenue-to-Cost Ratio Adjustment Workform reflects that the Current Tariff Distribution Volumetric Rate is 0.0004 for the Unmetered Scattered Load Rate class while the current tariff indicates this to be 0.0111.

Question(s):

- a) Please explain this discrepancy and update the Revenue-to-Cost Ratio Adjustment Workform, and Rate Generator Model, as applicable.

[Response](#)

Orangeville Hydro confirms that the Current Tariff Distribution Volumetric Rate should be 0.0111 for the Unmetered Scattered Load Rate class. The Revenue-to-Cost Ratio Adjustment Workform has been updated.

OEB Staff-4

Ref 1: Rate Generator Model, Tab 12 – RTSR – Historical Wholesale

Preamble:

There appears to be no rates or amounts listed under “Line Connection” for Hydro One Networks Inc.

Question(s):

- a) Please explain why the “Line Connection” section is blank.

[Response](#)

Orangeville Hydro is not charged a Line Connection rate from Hydro One, which is why the “Line Connection” section is blank in the Rate Generator Model, Tab 12 – RTSR – Historical Wholesale. No changes to the Rate Generator Model have been made.

OEB Staff-5

Ref 1: Commodity Accounts Analysis Workform, Tabs - GA 2021, GA 2022, GA 2023 and GA, Cell K62

Ref 2: EB-2024-0048, Decision and Rate Order, Schedule A, March 20, 2025

Preamble:

The Commodity Accounts Analysis Workform reflects that the Most Recent Approved Loss Factor for Secondary Metered Customer < 5,000kW is 1.0481 while the current tariff indicates this to be 1.0491.

Question(s):

- a) Please explain this discrepancy and update the Commodity Accounts Analysis Workform, as applicable.

[Response](#)

During 2021 to 2023, the most recent approved loss factor was 1.0481 during EB-2013-0160. No update to the Commodity Accounts Analysis Workform is required.

OEB Staff-6

Ref: Rate Generator Model, Tab 3, Continuity Schedule

Preamble:

On September 11, 2025 and December 10, 2025, the OEB published the Q4 2025 and Q1 2026 prescribed accounting interest rates applicable to the carrying charges of deferral, variance and construction work in progress (CWIP) accounts of natural gas utilities, electricity distributors and other rate-regulated entities.

Question(s):

- a) Please update Tab 3 (Continuity Schedule) as necessary to reflect the Q4 2025 and Q1 2026 OEB-prescribed interest rates of 2.91% and 2.55%.

[Response](#)

Orangeville Hydro has updated the Rate Generator Model, Tab 3, Continuity Schedule to reflect the Q4 2025 and Q1 2026 OEB-prescribed interest rates of 2.91% and 2.55%.

OEB Staff-7

Ref. 1: Manager's Summary, p. 18

Ref. 2: EB-2023-0045, Decision and Order, April 23, 2024, p. 4

Ref. 3: EB-2023-0045, Decision and Order, April 23, 2024, Settlement Proposal, p. 46

Ref. 4: EB-2023-0045, Settlement Proposal, 2024 DVA Continuity Schedule_20240313, Tab 2a

Ref. 5: 2026 IRM Rate Generator Model, Tab 3

Ref. 6: 2026 IRM Rate Generator Model, Tab 1

Preamble:

Orangeville Hydro states that its Group 1 Deferral and Variance Account (DVA) balances were approved for final disposition up to December 31, 2020 in its last Cost of Service application and that the balances for 2021 and 2022 were approved for interim disposition in the same proceeding.

In Reference 2, the OEB approved the disposition of the Group 1 DVA balances as of December 31, 2022, including forecasted interest through to April 30, 2024, as agreed to in the approved settlement proposal. The approved Group 1 DVA disposition balances are also summarized in Table 6.1B of Reference 3.

In Reference 6, Orangeville Hydro indicates that Accounts 1588 and 1589 were last disposed on a final basis in 2020 and the remaining Group 1 DVAs were last disposed of on a final basis in 2022.

OEB staff has identified reporting variances between the Account 1595 balances shown in the 2024 Continuity Schedule attached to the OEB-approved settlement proposal and those reported in the 2026 Rate Generator Model. These variances are outlined in the table below.

Reporting Variances Noted in Account 1595	Closing Principal Balance As of		
	Dec. 31, 2020	Dec. 31, 2021	Dec. 31, 2022
Ref.4 Account 1595 (2020)	265,440	4,829	4,845
Ref.5 Account 1595 (2020)	251,635	(8,976)	(8,961)
Variance in Account 1595 (2020)	13,805	13,805	13,806
Ref.4 Account 1595 (2021)		373,275	(22,280)
Ref.5 Account 1595 (2021)		326,439	(69,117)
Variance in Account 1595 (2021)	-	46,836	46,837
Ref. 4 Account 1595 (2022)			314,525
Ref. 5 Account 1595 (2022)			294,417
Variance in Account 1595 (2022)	-	-	20,108

Question(s):

- a) Please explain why Orangeville Hydro's statement regarding the interim/final disposition of the 2021 and 2022 Group 1 DVA balances contradict each other between Reference 1, Reference 3 and Reference 6.
- b) Please clarify and provide the reference in EB-2023-0049 to:
 - i. The interim disposition of the 2021 and 2022 Group 1 DVA balances; and
 - ii. The final disposition of Group 1 DVA balances up to 2020.
- c) Please provide an updated 2026 Rate Generator Model and Commodity Accounts Analysis Workform, reflecting the appropriate beginning balance year, if applicable.
- d) Please confirm and explain the reporting variances in Account 1595 balances identified by OEB staff.
 - i. Please clarify why Orangeville Hydro did not request the disposition of Account 1595, sub-accounts 2020, 2021 and 2022 in the current application.
 - ii. Please provide an updated 2026 Rate Generator Model, if applicable.

Response

- a) Orangeville Hydro does not believe it contradicts itself. In its reference 2, it was unclear as to whether balances were approved for interim or final disposition. During EB-2024-0048, Staff Question-11 a), OHL confirmed that the last final disposition of both Account 1589 RSVA-GA and Account 1588 RSVA-Power are the balances as of December 31, 2020 as these balances were included in the OEB inspection (from EB-2023-0045).
- b) There is no reference to interim or final disposition of 1588 or 1589 in EB-2023-0049. In EB-2024-0048, Staff Question-11 a), OHL confirmed that 1588 and 1589 balances were final disposed to December 31, 2020 and interim disposed for 2021 and 2022. Orangeville Hydro prepared EB-2025-0015 on this premise.
- c) Not applicable.
- d) The variances between the 2024 COS EB-2023-0045 and the 2026 Rate Generator Model, were due to an error that was brought to light in the EB-2024-0048 2025 IRM Staff Questions #9 and #10. The 1595 disposition amounts were not reflected accurately in the 2024 COS DVA Continuity Schedule. The total claim amount did not change, but the presentation of the principal and interest amounts did. Please see the table below for the reconciliation of the variances.

Reporting Variances Noted in Account 1595	Closing Principal and Interest Balance As of		
	Dec. 31, 2020	Dec. 31, 2021	Dec. 31, 2022
Ref.4 Account 1595 (2020)	265,440	4,829	4,845
Ref.4 Account 1595 (2020) Interest	1,564	2,316	3,467
Ref. 4 Total 2020	267,004	7,145	8,312
Ref.5 Account 1595 (2020)	251,635	-8,976	-8,961
Ref.5 Account 1595 (2020) Interest	15,369	16,121	17,272
Ref. 5 Total 2020	267,004	7,145	8,311
Variance in Account 1595 (2020)	0	0	-1
Ref.4 Account 1595 (2021)		373,275	-22,280
Ref.4 Account 1595 (2021) Interest		2,862	3,202
Ref. 4 Total 2021	0	376,137	-19,078
Ref.5 Account 1595 (2021)		326,439	-69,117
Ref.5 Account 1595 (2021) Interest		49,699	50,039
Ref. 5 Total 2021	0	376,138	-19,078
Variance in Account 1595 (2021)	-	1	0
Ref. 4 Account 1595 (2022)			314,525
Ref.4 Account 1595 (2022) Interest			10,442
Ref. 4 Total 2022	0	0	324,967
Ref. 5 Account 1595 (2022)			294,417
Ref.5 Account 1595 (2022) Interest			30,550
Ref. 5 Total 2022	0	0	324,967
Variance in Account 1595 (2022)	-	0	0

- i. Orangeville Hydro inadvertently did not request the disposition of Account 1595, sub accounts 2020, 2021 and 2022 in the current application.
- ii. An updated 2026 Rate Generator model has been submitted, with the requested disposition of Account 1595, sub accounts 2020, 2021 and 2022.

OEB Staff-8

Ref. 1: EB-2023-0045, Settlement Proposal, 2024 DVA Continuity Schedule_20240313

Ref. 2: 2026 IRM Rate Generator Model, Tab 3

Ref. 3: EB-2023-0045, Settlement Proposal, 2024 GA Analysis Workform_20240313, Principal Adjustments Tab

Ref. 4: 2026 Commodity Accounts Analysis Workform, Principal Adjustments Tab

Ref. 5: OEB letter “Adjustments to Correct for Errors in Electricity Distributor “Pass-Through” Variance Accounts After Disposition” October 31, 2019 (OEB’s retroactivity letter)

Preamble:

OEB staff notes discrepancies between the previously approved 2021 and 2022 balances for Accounts 1588 and 1589, as reported in Reference 1, and the balances reported in Reference 2. These variances are due to the differences in the reported principal adjustments. OEB staff has outlined the variances in the tables below.

Account 1588 Principal Amounts	Principal Adjustments in 2021	Closing Principal Amounts as of Dec. 31, 2021	Principal Adjustments in 2022	Closing Principal Amounts as of Dec. 31, 2022
Ref. 1: 2024 Continuity Schedule	360,288	215,226	-	277,575
Ref. 2: 2026 Continuity Schedule	200,146	55,084	(53,283)	64,150

Variations	160,142	160,142	53,283	213,425
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Account 1589 Principal Amounts	Principal Adjustments in 2021	Closing Principal Amounts as of Dec. 31, 2021	Principal Adjustments in 2022	Closing Principal Amounts as of Dec. 31, 2022
Ref. 1: 2024 Continuity Schedule	(415,516)	(38,113)	-	623
Ref. 2: 2026 Continuity Schedule	(358,465)	18,938	(28,928)	28,746
Variations	(57,051)	(57,051)	28,928	(28,123)

In Reference 5, the OEB’s retroactivity letter states that “Where an accounting or other error is discovered after the balance in one of the above-listed variance accounts has been cleared by a final order of the OEB, the OEB will determine on a case-by-case basis whether to make a retroactive adjustment based on the particular circumstances of each case, including factors such as:

- whether the error was within the control of the distributor
- the frequency with which the distributor has made the same error
- failure to follow guidance provided by the OEB
- the degree to which other distributors are making similar errors”

Question(s):

- a) Please confirm and explain the variances between Reference 1 and Reference 2 related to the 2021 and 2022 principal amounts reported in Accounts 1588 and 1589 as observed by OEB staff.
 - i. Please provide an itemized reconciliation of the principal amounts reported in References 3 and 4 for Accounts 1588 and 1589.
- b) Given that Accounts 1588 and 1589 have been approved for final disposition for the balances up to 2022, please provide Orangeville Hydro’s view on whether the proposed 2021 and 2022 principal adjustments in the current application result in a rates retroactivity issue.
 - i. If so, please provide comments on the four factors outlined in the OEB’s retroactivity letter.

Response

- a) An itemized reconciliation of the principal amounts reported in Accounts 1588 and 1589 are provided below.

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Account 1588	2024 COS Amount	2026 IRM Amount	Variance	Explanation
2021 Opening Principal	309,637	309,637	-	
2021 Transactions	(309,001)	(309,001)		
2021 OEB-Approved Dispositions	145,698	145,698		
2021 PA	317,903	228,726	89,177	FY 2021 CT 148 true-up of GA Charges based on actual Non-RPP volumes.
2021 PA		385,435	(385,435)	FY 2021 CT 1142 true-up based on actuals.
2021 PA		(383,385)	383,385	Remove 2021 CT 1142 True-up booked as an accrual in 2021 GL. This amount was paid to the IESO in February 2022 and accrual reversed in February 2022.
2021 PA		90,156	(90,156)	Remove 2021 CT 148 True-up booked in 2021 GL.
2021 PA		(78,422)	78,422	CT 2148 Issue 1327 on April 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for 2021, energy portion.
2021 PA		(42,363)	42,363	Class A customer 2021 Energy re-bill in 2022
2021 PA	42,385	42,385		Underbilled customer due to wrong meter multiplier
Total 2021 PA	360,288	200,146	160,142	
2021 Closing Principal	215,226	55,084	160,142	
2022 Transactions	62,349	62,349		
2022 OEB-Approved Dispositions	-	-		
2022 PA		344,093		To reverse the 2020 CT1142 DVA PA from 2024 COS (EB-2023-0045) which was claimed from the IESO in November 2022. As this claim is now in the GL, the previous PA must be reversed.
2022 PA		(41,850)		To reverse the 2020 CT1142 DVA PA from 2024 COS (EB-2023-0045) which was claimed from the IESO in November 2022. As this claim is now in the GL, the previous PA must be reversed.
2022 PA		62,279		FY 2022 CT 148 true-up of GA Charges based on actual RPP volumes
2022 PA		(286,671)		Reversal of CT 1142 true-up based on actuals. This amount was paid to the IESO in February 2023 and the amount accrued in the 2021 GL reversed in the 2022 GL.
2022 PA		(63,837)		Remove FY 2022 CT 148 TU booked in 2022 GL.
2022 PA		(75,262)		CT 2148 Issue 1327 on April 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for 2021, energy portion.
2022 PA		(279)		CT 2148 Issue 1309 on Feb 2023 bill, Adjustment of Class B Global Adjustment due to change in reported embedded generation for October 2022
2022 PA		(3,065)		CT 2148 Issue 1357 on July 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for December 2022, Energy booked in GL to GA only
2022 PA		(31,056)		FY 2022 CT 1142 true-up based on actual.
2022 PA		42,363		Class A customer 2021 Energy re-bill in 2022
Total 2022 PA	-	(53,283)	53,283	
2022 Closing Principal	277,575	64,150	213,425	

Account 1589	2024 COS Amount	2026 IRM Amount	Variance	Explanation
2021 Opening Principal	473,631	473,631	-	
2021 Transactions	326,671	326,671		
2021 OEB-Approved Dispositions	422,899	422,899		
2021 PA	(317,903)	(228,726)	(89,177)	FY 2021 CT 148 true-up of GA Charges based on actual Non-RPP volumes.
2021 PA		(90,156)	90,156	Remove FY 2021 CT 148 True-up booked in 2021 GL.
2021 PA		(39,594)	39,594	CT 2148 Issue 1327 on April 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for 2021, GA portion.
2021 PA		(7,665)	7,665	CT 2148 Issue 1233 on July 2022 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for July 2021
2021 PA		7,676	(7,676)	CT 2148 Reversal of Issue 1233 on April 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for July 2021
2021 PA	(97,613)	(97,613)		Customer moved from non-RPP to RPP
Total 2021 PA	(415,516)	(358,465)	(57,051)	
2021 Closing Principal	(38,113)	18,938	(57,051)	
2022 Transactions	38,736	38,736		
2022 OEB-Approved Dispositions	-	-		
2022 PA		(62,279)	62,279	FY 2022 CT 148 true-up of GA Charges based on actual Non-RPP volumes.
2022 PA		63,837	(63,837)	Remove FY 2022 CT 148 True-up booked in 2021 GL.
2022 PA		(36,776)	36,776	CT 2148 Issue 1327 on April 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for 2021, GA portion.
2022 PA		(8,424)	8,424	Issue 1327 on April 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for December 2022.
2022 PA		7,665	(7,665)	CT 2148 Issue 1233 on July 2022 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for July 2021
2022 PA		(143)	143	CT 2148 Issue 1309 on Feb 2023 bill, Adjustment of Class B Global Adjustment due to change in reported embedded generation for October 2022
2022 PA		(1,232)	1,232	CT 2148 Issue 1357 on July 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for December 2022
2022 PA		8,424	(8,424)	Reversal of Issue 1327 on July 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for December 2022
Total 2022 PA	-	(28,928)	28,928	
2022 Closing Principal	623	28,746	(28,123)	

b) Orangeville Hydro does not agree with Accounts 1588 and 1589 have been approved for final disposition for balances up to 2022.

During EB-2024-0048, Staff Question-11, OHL confirmed that the last final disposition of both Account 1589 RSVA-GA and Account 1588 RSVA-Power are the balances as of December 31, 2020 as these balances were included in the OEB inspection (from EB-2023-0045).

Orangeville Hydro withdrew its disposition request during EB-2024-0048.

Orangeville Hydro originally requested disposition of its Group 1 DVA balances. However, by letter dated February 14, 2025, Orangeville Hydro withdrew its request to dispose of its Group 1 DVA balances. Orangeville Hydro indicated that it would like to further investigate the balances within commodity Accounts 1588 and 1589. After removing these accounts, the overall Group 1 DVA disposition balance is significantly lower than the threshold set by the OEB to allow disposition of DVA balances. Orangeville Hydro indicated that its Group 1 DVA balances will be brought forward for disposition in its 2026 IRM application.

There is no rates retroactivity impact, as this adjustment does not represent an adjustment to an account balance that was previously approved by the OEB on a final basis. Orangeville Hydro only seeks to reverse the Principal Adjustment in the GA Analysis Workform and the DVA Continuity according to the OEB's expectations. As a result, the four factors in Ref. 5 of the OEB's letter issued on October 31, 2019 do not apply as there are no rates retroactivity concerns.

OEB Staff-9

Ref. 1: 2026 Commodity Accounts Analysis Workform, Principal Adjustments Tab

Ref. 2: Manager's Summary, pp. 19-20, Tables 11-14

Ref. 3: EB-2023-0045, IRRs 9-Staff-55 c)

Ref. 4: EB-2023-0045, Settlement Proposal, 2024 GA Analysis Workform_20240313, Principal Adjustments Tab

Ref. 5: Manager's Summary, p. 19

Preamble:

OEB staff has grouped Account 1588 principal adjustments (PA) provided in Reference 1 by the nature of the adjustments based on the adjustment descriptions provided in References 1 and 2. The categorized PAs are outlined in the tables below. OEB staff has combined the adjustment descriptions provided in References 1 and 2. Additionally, OEB staff's observation of the reporting differences between the principal adjustments reported in Reference 1 and the OEB-approved 2024 GA Analysis Workform provided in Reference 4 is outlined in the last column of the tables.

1. CT 1142/142 True-up Related Adjustments:

Year	PA Item #	CT 1142/142 True-up Related Adjustment Description	Amount	Year Recorded in GL	PA Reported in Ref.4 (Y/N)
2020		Reversal of FY 2020 CT 1142/142 true-up based on actuals	41,850	GL 2022, PA reverses 2022	Y
2022	5	FY 2020 CT 1142 Post-Claim	(41,850)	GL 2022, PA reverses 2020	N
2020		Remove FY 2020 CT 1142 true-up currently in GL	(344,093)	GL 2022, PA reverses 2022	Y
2022	4	Remove FY 2020 CT 1142 booked in 2022 GL. To reverse the 2020 CT 1142 DVA PA from 2024 COS (EB-2023-0045) which was claimed from the IESO in November 2022. As this claim is now in the GL, the previous PA must be reversed.	344,093	GL 2022, PA reverses 2020	N
2021	2	CT 1142/142 true-up based on actuals	385,435	GL 2025, PA reverses 2025	N
2021	4	Remove FY2021 CT 1142 TU booked in 2021 GL. Remove 2021 CT 1142 True-up booked as an accrual in 2021 GL. This amount was paid to the IESO in February 2022 and accrual reversed in February 2022	(383,385)	GL 2025, PA reverses 2025	N
2022	12	FY 2022 CT 1142 TU	(31,056)	GL 2025, PA reverses 2025	N

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2022	2	Reversal of CT 1142/142 true-up based on actuals. This amount was paid to the IESO in February 2023 and the amount accrued in the 2021 GL reversed in the 2022 GL.	(286,671)	GL 2025, PA reverses 2025	N
2024	8	Remove FY2021 CT 1142 TU booked in 2024 GL, as it was claimed from the IESO in November 2024.	76,368	GL 2025, PA reverses 2025	N/A
2024	4	FY 2024 CT 1142 true-up, paid to the IESO in 2025	122,147	GL 2025, PA reverses 2025	N/A

2. CT148 True-up Related Adjustments:

Year	PA Item #	CT 148 True-up Related Adjustment Description	Amount	Year Recorded in GL	PA Reported in Ref.4 (Y/N)
2020		Remove FY 2020 CT 148 true-up of GA charges currently in GL	(304,017)	GL 2024, PA reverses 2024	Y
2024	5	FY 2020 CT 148 in 2024 GL	304,017	GL 2024, PA reverses 2020	N/A
2020		CT 148 FY 2020 true-up of GA Charges based on actual RPP volumes	605,187	GL 2024, PA reverses 2024	Y
2024	4	Remove FY2020 CT 148 TU booked in 2024 GL	(605,187)	GL 2024, PA reverses 2020	N/A
2021	1	CT 148 true-up of GA Charges based on actual RPP volumes	228,726	GL 2025, PA reverses 2025	N
2021	5	Remove FY2021 CT 148 TU booked in 2021 GL	90,156	GL 2025, PA reverses 2025	N
2022	1	CT 148 true-up of GA Charges based on actual RPP volumes	62,279	GL 2025, PA reverses 2025	N
2022	4	Remove FY 2022 CT 148 TU booked in 2022 GL	(63,837)	GL 2025, PA reverses 2025	N
2024	1	CT 148 true-up of GA Charges based on actual RPP volumes	(22,402)	GL 2025, PA reverses 2025	N/A
2024	6	FY 2021 CT 148 in 2024 GL	(317,903)	GL 2025, PA reverses 2025	N/A

3. CT2148 Related Adjustments:

Year	PA Item #	CT2148 Related Adjustment Description	Amount	Year Recorded in GL	PA Reported in Ref.4 (Y/N)
2021	6	CT 2148, Issue 1327 for prior period corrections - on April 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for 2021, energy portion.	(78,422)	GL 2025, PA reverses 2025	N
2022	5	CT 2148, Issue 1327 for prior period corrections - on April 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for 2021, energy portion.	(75,262)	GL 2025, PA reverses 2025	N
2023	9	CT 2148, Issue 1327 for prior period corrections - on July 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for December 2020, Energy booked in GL to GA only. Energy portion.	2,894	GL 2025, PA reverses 2025	N/A
CT 2148, Issue 1327 Total			(150,790)		
2022	8	CT 2148, Issue 1309 for prior period corrections - on Feb 2023 bill, Adjustment of Class B Global Adjustment due to change in reported embedded generation for October.	(279)	GL 2025, PA reverses 2025	N
2022	9	CT 2148, Issue 1357 for prior period corrections - on July 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for December 2022, Energy booked in GL to GA only.	(3,065)	GL 2025, PA reverses 2025	N
2023	15	CT 2148, Issue 1347 for prior period corrections - on April 2023 bill, Adjustment of Class B Global Adjustment due to change in reported embedded generation for April 2023 Energy booked in GL to GA only.	2,399	GL 2025, PA reverses 2025	N/A
CT 2148 Total			(151,734)		

In Reference 3, Orangeville Hydro explained that no PAs or reversals of PAs were reported in 2022 for Account 1588, as none were required.

In Reference 5, Orangeville Hydro stated that it had cancelled and re-billed one of its Class A customers in 2023 to correct underbilling due to a wrong meter multiplier for December 2020 to November 2022. The Class A customer 2021 energy re-bill was accrued in 2022. Orangeville Hydro submitted post-claims to the IESO for the increased Class A loads. The IESO refunded the Class B GA that had been charged to Orangeville Hydro for the relevant period (CT 2148 Issue 1327).

OEB staff observes discrepancies in the reported principal adjustment in Account 1588, related to the 2021 Class A customer rebill, between References 1 and 4. The discrepancies have been summarized by OEB staff in the table below.

References	Item Description	Principal Adjustment (PA) in Account 1588	Year Recorded in GL	Reversal PA Recorded in
Ref. 4: 2024 GA Analysis Workform	2021 PA: Underbilled customer due to wrong meter multiplier	42,385	2023	None
Ref. 1: 2026 Commodity Analysis Workform	2021 PA: Class A customer 2021 Energy re-bill in 2022	(42,363)	2022	2022
Ref. 1: 2026 Commodity Analysis Workform	2022 PA: Class A customer 2021 Energy re-bill in 2022	42,363	2025	2025
Ref. 1: 2026 Commodity Analysis Workform	CT 2148, Issue 1327 Toal	(150,790)	2025	2025

Question(s):

- a) Please explain why Orangeville Hydro reported reversals of 2020 PAs and additional PAs in 2022, contrary to its explanation provided in Reference 3.

Response

While Orangeville Hydro was preparing its 2024 COS which was due in August 2023, it was also undergoing a 34-month long OEB inspection with regards to 1588/1589 for the period of 2017 to 2020. After its COS, OHL took a major undertaking to review its books and to ensure that all PA's were reversed from its DVA continuity, all GL balances were investigated and all IESO claims accounted for properly. This resulted in reversals of 2020 PAs and additional PAs in 2022, which were not originally included in EB-2023-0045.

A slight change to the 2026 Commodity Analysis Workform was made with regards to the comment in Year Recorded in GL for the \$42,363 PA.

13	Class A customer 2021 Energy re-bill in 2022	42,363	GL 2022, PA reverses 2021
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- b) Please provide itemized explanations for the PAs reported in 2021 and 2022 but not reported in the OEB-approved 2024 GA Analysis Workform (Reference 4). These PAs are highlighted in orange in OEB staff's summary tables.

Response

In page 19 of OHL_2026_Managers summary_20251009, Orangeville Hydro explains the Class A customer re-bill that occurred for the period of December 2020 to November 2022. The increased Class A loads reported to the IESO resulted in a considerable reduction in Class B GA paid to the IESO, which was re-imbursed to OHL on its April 2023 IESO invoice. Orangeville Hydro had to re-run the Accounting Guidance for 2021 and 2022 to account for the increased Class A load.

At the time, Orangeville Hydro incorrectly recorded CT2148 in its 1589 account only.

4. CT 1142/142 True-up Related Adjustments:

Year	PA Item #	CT 1142/142 True-up Related Adjustment Description	Amount	Year Recorded in GL	PA Reported in Ref.4 (Y/N)
2020		Reversal of FY 2020 CT 1142/142 true-up based on actuals	41,850	GL 2022, PA reverses 2022	Y

2022	5	FY 2020 CT 1142 Post-Claim	(41,850)	GL 2022, PA reverses 2020	N
2020		Remove FY 2020 CT 1142 true-up currently in GL	(344,093)	GL 2022, PA reverses 2022	Y
2022	4	Remove FY 2020 CT 1142 booked in 2022 GL.To reverse the 2020 CT1142 DVA PA from 2024 COS (EB-2023-0045) which was claimed from the IESO in November 2022. As this claim is now in the GL, the previous PA must be reversed.	344,093	GL 2022, PA reverses 2020	N
2021	2	CT 1142/142 true-up based on actuals	385,435	GL 2025, PA reverses 2025	N
2021	4	Remove FY2021 CT 1142 TU booked in 2021 GL.Remove 2021 CT 1142 True-up booked as an accrual in 2021 GL. This amount was paid to the IESO in February 2022 and accrual reversed in February 2022	(383,385)	GL 2025, PA reverses 2025	N
2022	12	FY 2022 CT 1142 TU	(31,056)	GL 2025, PA reverses 2025	N
2022	2	Reversal of CT 1142/142 true-up based on actuals. This amount was paid to the IESO in February 2023 and the amount accrued in the 2021 GL reversed in the 2022 GL.	(286,671)	GL 2025, PA reverses 2025	N
2024	8	Remove FY2021 CT 1142 TU booked in 2024 GL,as it was claimed from the IESO in November 2024.	76,368	GL 2025, PA reverses 2025	N/A
2024	4	FY 2024 CT 1142 true-up,paid to the IESO in 2025	122,147	GL 2025, PA reverses 2025	N/A

2022 PA Item #4 – A review of the GL and IESO claims for 2022 revealed that a claim of \$302,243 was made in November 2022 with respect to 2020. This included the removal of FY 2020 CT 1142 of \$344,093, as well as the FY 2020 CT 1142 Post-Claim of (41,850).

2021 #2 and #4 – Amounts are different due to re-doing the full year Accounting Guidance.

2022 #12 and #2 – Amounts are different due to re-doing the full year Accounting Guidance.

5. CT148 True-up Related Adjustments:

Year	PA Item #	CT 148 True-up Related Adjustment Description	Amount	Year Recorded in GL	PA Reported in Ref.4 (Y/N)
2020		Remove FY 2020 CT 148 true-up of GA charges currently in GL	(304,017)	GL 2024, PA reverses 2024	Y
2024	5	FY 2020 CT 148 in 2024 GL	304,017	GL 2024, PA reverses 2020	N/A
2020		CT 148 FY 2020 true-up of GA Charges based on actual RPP volumes	605,187	GL 2024, PA reverses 2024	Y
2024	4	Remove FY2020 CT 148 TU booked in 2024 GL	(605,187)	GL 2024, PA reverses 2020	N/A
2021	1	CT 148 true-up of GA Charges based on actual RPP volumes	228,726	GL 2025, PA reverses 2025	N
2021	5	Remove FY2021 CT 148 TU booked in 2021 GL	90,156	GL 2025, PA reverses 2025	N
2022	1	CT 148 true-up of GA Charges based on actual RPP volumes	62,279	GL 2025, PA reverses 2025	N
2022	4	Remove FY 2022 CT 148 TU booked in 2022 GL	(63,837)	GL 2025, PA reverses 2025	N
2024	1	CT 148 true-up of GA Charges based on actual RPP volumes	(22,402)	GL 2025, PA reverses 2025	N/A
2024	6	FY 2021 CT 148 in 2024 GL	(317,903)	GL 2025, PA reverses 2025	N/A

2021 #1 and #5 – Amounts are different due to re-doing the full year Accounting Guidance.

2022 #1 and #4 – Amounts are different due to re-doing the full year Accounting Guidance

1. CT2148 Related Adjustments:

Year	PA Item #	CT2148 Related Adjustment Description	Amount	Year Recorded in GL	PA Reported in Ref.4 (Y/N)
2021	6	CT 2148, Issue 1327 for prior period corrections - on April 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for 2021, energy portion.	(78,422)	GL 2025, PA reverses 2025	N
2022	5	CT 2148, Issue 1327 for prior period corrections - on April 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for 2021, energy portion.	(75,262)	GL 2025, PA reverses 2025	N
2023	9	CT 2148, Issue 1327 for prior period corrections - on July 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for December 2020, Energy booked in GL to GA only. Energy portion.	2,894	GL 2025, PA reverses 2025	N/A
CT 2148, Issue 1327 Total			(150,790)		
2022	8	CT 2148, Issue 1309 for prior period corrections - on Feb 2023 bill, Adjustment of Class B Global Adjustment due to change in reported embedded generation for October.	(279)	GL 2025, PA reverses 2025	N

2022	9	CT 2148, Issue 1357 for prior period corrections - on July 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for December 2022, Energy booked in GL to GA only.	(3,065)	GL 2025, PA reverses 2025	N
2023	15	CT 2148, Issue 1347 for prior period corrections - on April 2023 bill, Adjustment of Class B Global Adjustment due to change in reported embedded generation for April 2023 Energy booked in GL to GA only.	2,399	GL 2025, PA reverses 2025	N/A
CT 2148 Total			(151,734)		

2021 #6 is due to a change in Class A load for 2021 on the April 2023 IESO bill.

2022 #5 is due to a change in Class A load for 2022 (corrected from above) on the April 2023 IESO bill.

2022 #8 Issue 1309 is due to a change in reported embedded generation for October 2022 on the February 2023 IESO bill.

2022 #9 Issue 1357 is due to a change in reported Class A load for December 2022 on the July 2023 IESO bill.

- c) Please provide detailed explanations for the following questions related to the CT 1142/142 true-up adjustments:
- i. Why was the reversal of the 2021 accrual (2022 PA item #2) reported in the 2022 GL instead of 2023, given that the actual payment to the IESO was made in 2023?
 - ii. Please explain why the 2021 CT 1142/142 true-up based on actuals (2021 PA item #2) is recorded in 2025.
 - iii. Please explain why no corresponding principal adjustment was reported in 2021 for FY2021 CT 1142 true-up claimed from the IESO in 2024.

Response

- i. The amount of \$286,671 which related to FY 2022 was paid to the IESO in February 2023. The amount of \$286,671 was accrued in the 2022 GL (correction) and reversed in the 2023 GL (correction). The payment made to the IESO in 2023 was offset by the reversal of the accrual. The purpose of this PA is to reverse the amount in the 2022 GL relating to FY 2022. This GL entry will be done in 2025, and so the PA will reverse in 2025.

2022	12	FY 2022 CT 1142 TU	(31,056)	GL 2025, PA reverses 2025	N
2022	2	Reversal of CT 1142/142 true-up based on actuals. This amount was paid to the IESO in February 2023 and the amount accrued in the 2021 GL reversed in the 2022 GL.	(286,671)	GL 2025, PA reverses 2025	N

The Accounting Guidance was re-done for 2022, and the difference from the amended claim of \$31,056 relating to 2022 has been done on the December 2025 IESO invoice.

Below is a summary of FY2022 CT1142 claims.

FY 2022 CT1142 Summary	
Paid to IESO in February 2023	(286,671)
Receivable from IESO December 2025	317,727
Revised Accounting Guidance, receivable from IESO	<u>31,056</u>

- ii. The amount of \$383,385 which related to FY 2021 was claimed from the IESO in February 2022. The amount accrued in the 2021 GL and reversed in the 2022 GL. The purpose of this PA is to reverse the amount in the 2021 GL relating to FY 2021. This GL entry will be done in 2025, and so the PA will reverse in 2025.

2021	2	CT 1142/142 true-up based on actuals	385,435	GL 2025, PA reverses 2025	N
2021	4	Remove FY2021 CT 1142 TU booked in 2021 GL. Remove 2021 CT 1142 True-up booked as an accrual in 2021 GL. This amount was paid to the IESO in February 2022 and accrual reversed in February 2022	(383,385)	GL 2025, PA reverses 2025	N

The Accounting Guidance was re-done for 2021, and the difference from the amended claim of \$385,435 relating to 2021 has been done on the December 2025 IESO invoice.

Below is a summary of IESO claims.

FY 2021 CT1142 Summary	
Paid to IESO in February 2022	(383,385)
Claimed from IESO in November 2024	76,368
Payable to IESO December 2025	(78,418)
Revised Accounting Guidance, payable to IESO	<u>(385,435)</u>

- iii. The FY 2021 CT 1142 booked in the 2024 GL was incorrect. Technically, one could have booked a -76,368 and a +76,368 in the 2021 PA adjustments, which would amount to \$0.

2024	8	Remove FY2021 CT 1142 TU booked in 2024 GL as it was claimed from the IESO in November 2024.	76,368	GL 2025, PA reverses 2025	N/A
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- d) The descriptions provided for the 2021 principal adjustments related to CT 148 true-up indicate that these adjustments are required as they are recorded in the 2025 GL. However, the 2024 principal adjustment (PA item #6) states that the reversal principal adjustment is required in 2024 as the FY2021 CT 148 true-up is recorded in the 2024 GL.
- i. Please clarify in which year GL the 2021 CT 148 true-up is recorded in.
 - ii. Please confirm the dollar amount of the 2021 CT 148 true-up principal adjustment as the reversal principal adjustment reported in 2024 (PA item #6) does not fully back out the principal adjustments reported in 2021 (2021 PA item #1 and #5).

Response

- i. The 2021 CT 148 true-up from EB-2023-0045, of +\$317,903 was recorded in the 2024 GL.

PA Item #6, from 2026 IRM, of (\$317,903) was to reverse the FY 2021 CT 148 booked in the 2024 GL. This reversal will be booked in the 2025 GL, and the PA will reverse in 2025.

| 2024 | 6 | FY 2021 CT 148 in 2024 GL

| (317,903) | GL 2025, PA reverses 2025 |

N/A |

- ii. The 2021 PA Item #5, of \$90,156 was to remove the incorrect amount booked in the GL in 2021.

The 2024 PA Item #6 of (\$317,903) FY 2021 CT 148 booked in the 2024 GL as a result of EB-2024-0045. Technically, one could have booked a +317,903 and a (\$317,903) in the 2021 PA adjustments, which would amount to \$0.

PA Item #1 is the CT 148 true up of \$228,726 based on re-doing the Accounting Guidance during 2026 IRM.

- e) Please provide detailed explanations for following questions related to the “CT 2148 Issue 1327” adjustments:
- i. Please confirm the total adjustments recorded in Account 1588 related to “CT 2148 Issue 1327” is a credit of \$150,790 as observed by OEB staff.
 - ii. Please confirm the description provided in Table 12 of Reference 2 regarding the 2022 credit PA of \$75,262, which indicates that the adjustment is related to change in the reported Class A load for 2021. Once confirmed, please explain why the PA for the 2021 transaction is reported in 2022.
 - iii. Please confirm whether the “CT 2148 Issue 1327” related adjustment for December 2020 reported in 2023 results in a rates retroactivity issue. If so, please provide comments on the four factors outlined in the OEB’s retroactivity letter (as explained in OEB Staff-8).

Response

- i. Confirmed.
 - ii. The Excel version of [OHL_2026_Commodity_Accounts_Analysis_Workform_20251009](#) had the correct year of 2022 for the amount of \$(75,262). Table 12 of Reference 2 should have indicated that the adjustment is related to change in the reported Class A load for 2022, and not 2021.
 - iii. The amount of \$2,894 CT 2148 Issue 1327 for December 2020 is immaterial, as it would round to nothing in our distribution rates.
- f) Please explain why the Class A customer re-bill related PA in Account 1588 changed from a debit of \$42,385, as reported in Reference 4, to a total credit \$150,790, as reported in Reference 1.

- i. Please confirm the year in which Orangeville Hydro submitted post-claim to IESO and the dollar amount.
- ii. Please confirm the year in which IESO settled and issued payments related to “CT 2148 Issue 1327” and the dollar amount.
- iii. Please confirm the year(s) in which Orangeville Hydro recorded the accruals for the post-claim and the dollar amount.

Response

There were many complexities associated with the Class A customer re-bill due to wrong meter multiplier. The billing of the energy only portion for this Class A customer was accrued in 2022, but contained both 2021 and 2022 consumption. The PA credit of \$42,385 in 2021 is offset by the PA debit of \$42,385 in 2022.

When Orangeville Hydro revised its Class A consumption with the IESO, this gave rise to CT 2148. The \$150,790 is associated with this post-claim submission.

- i. The post-claims to the IESO and the dollar amounts are summarized below.

IESO Bill	Amount	Description
Apr-23	4,224.14	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for December 2020
Apr-23	9,198.31	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for January 2021
Apr-23	5,655.66	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for February 2021
Apr-23	11,659.14	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for March 2021
Apr-23	13,171.09	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for April 2021
Apr-23	12,330.32	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for May 2021
Apr-23	10,020.52	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for June 2021
Apr-23	17,010.64	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for July 2021
Apr-23	5,621.39	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for August 2021
Apr-23	8,549.18	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for September 2021
Apr-23	7,074.87	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for October 2021
Apr-23	9,447.10	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for November 2021
Apr-23	8,277.71	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for December 2021
Apr-23	7,571.26	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for January 2022
Apr-23	8,781.22	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for February 2022
Apr-23	11,373.25	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for March 2022
Apr-23	15,312.82	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for April 2022
Apr-23	16,129.50	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for May 2022
Apr-23	14,138.14	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for June 2022
Apr-23	6,987.36	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for July 2022
Apr-23	928.61	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for August 2022
Apr-23	6,084.69	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for September 2022
Apr-23	11,050.92	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for October 2022
Apr-23	13,680.22	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for November 2022
Apr-23	8,424.07	Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for December 2022
Jul-23	(8,424.07)	Reversal of Issue 1327, Adjustment of Class B Global Adjustment due to change in reported Class A load for December 2022
Total	\$234,278.06	
Fiscal Year	Amount	
2020	\$4,224.14	
2021	\$118,015.93	
2022	\$112,037.99	
Total	\$234,278.06	

- ii. See detail table in i.
- iii. Orangeville Hydro did not accrue a post-claim in 2022. Our books were closed.

OEB Staff-10

Ref. 1: Ref. 6: 2026 Commodity Accounts Analysis Workform, Account 1588 Tab, Note

Ref. 2: 2026 Commodity Accounts Analysis Workform, Account 1588 Tab, Note 7a

Preamble:

In Note 2 of Reference 1, the OEB provides the following instructions related to Reconciling Items.

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 reasonability test for Account 1588.

In Reference 2, Orangeville Hydro reported a reconciling item of \$33,084 related to underbilled CT 148 from the IESO for August 2023.

Question(s):

- a) Has Orangeville Hydro recorded the correction in its GL to reflect the adjusted Energy cost?
 - i. If yes, please confirm the year in which the adjustment was recorded.
 - ii. If no, please explain why.
- b) Based on the OEB instructions provided for the reconciling items, please confirm whether any of the reported PA should instead be reported as reconciling items.
 - i. Please update the 2026 Commodity Accounts Analysis Workform, if applicable.

Response

- a) Orangeville Hydro has not recorded any adjusted Energy cost in its GL. This is a reconciling item only. The IESO has not and will not charge us for this. Orangeville Hydro filed a Notice of Disagreement with the IESO as the IESO August 2023 AQEW was very much lower from Orangeville Hydro's meter point. We also filed 3 separate support tickets with the IESO, asking for an explanation. We also looked at all of the RCSS invoices for August 2023 and did not see any noticeable difference in the dollars of CT 148.

Charge Type 148-August 2023	(1,174,304.10)
STPF	(1,183,492.24)
September 2023 R1	(1,178,446.78)
October 2023 R2	(1,178,551.54)
January 2024 R3	(1,173,545.38)
April 2024 R4	(1,173,731.14)
July 2024 R5	(1,172,769.71)
Jan 2025 R6	(1,179,345.03)

We finally let the tickets close with the IESO. This is a reconciling item, as the IESO has gone to R6 without charging us for the AQEW for August 31, 2023.

- b) Orangeville Hydro confirms that none of the reported PA's should instead be reported as reconciling items, as all PA's either have been or are being reversed.

OEB Staff-11

Ref. 1: 2026 Commodity Accounts Analysis Workform, Principal Adjustments Tab

Ref. 2: Manager's Summary, pp. 20-21, Tables 15-18

Ref. 3: EB-2023-0045, Settlement Proposal, 2024 GA Analysis Workform_20240313, Principal Adjustments Tab

Preamble:

OEB staff has grouped Account 1589 PAs provided in Reference 1 by the nature of the adjustments based on the adjustment descriptions provided in References 1 and 2. The categorized PAs are outlined in the tables below. OEB staff has combined the adjustment descriptions provided in References 1 and 2. Additionally, OEB staff's observation of the reporting differences between the principal adjustments reported in Reference 1 and the OEB-approved 2024 GA Analysis Workform provided in Reference 3 is provided in the last column of the tables.

1. 2016 Related Adjustments:

Year	PA Item #	2016 Related Adjustment Description	Amount	Year Recorded in GL	PA Reported in Ref.4 (Y/N)
2024	7	2016 1st GA to final GA	200,868	Never in GL, reversal of 2016	N/A
2024	8	2016 Difference in GA IESO posted rate and rate paid	351	Never in GL, reversal of 2016	N/A

2. CT148 Related Adjustments:

Year	PA Item #	CT 148 True-up Related Adjustment Description	Amount	Year Recorded in GL	PA Reported in Ref.4 (Y/N)
2020		Remove FY 2020 CT 148 true-up of GA charges currently in	304,017	GL 2024, PA reverses 2024	Y
2024	5	FY 2020 CT 148 in 2024 GL	(304,017)	GL 2024, PA reverses 2020	N/A
2020		CT 148 FY 2020 true-up of GA Charges based on actual	(605,187)	GL 2024, PA reverses 2024	Y
2024	4	Remove FY2020 CT 148 TU booked in 2024 GL	605,187	GL 2024, PA reverses 2020	N/A
2021	1	CT 148 true-up of GA Charges based on actual Non-RPP volumes - FY 2021 CT 148 true-up of GA Charges based on actual Non-RPP volumes.	(228,726)	GL 2025, PA reverses 2025	N
2021	4	Remove FY2021 CT 148 TU booked in 2021 GL	(90,156)	GL 2025, PA reverses 2025	N
2022	1	FY 2022 CT 148 true-up of GA Charges based on actual Non-RPP volumes	(62,279)	GL 2025, PA reverses 2025	N
2022	4	Remove FY 2022 CT 148 TU booked in 2022 GL	63,837	GL 2025, PA reverses 2025	N
2024	1	CT 148 true-up of GA Charges based on actual Non-RPP volumes - FY 2024 CT 148 true-up of GA Charges based on actual Non-RPP volumes.	22,402	GL 2025, PA reverses 2025	N/A
2024	6	FY 2021 CT 148 in 2024 GL from 2024 COS	317,903	GL 2024, PA reverses 2025	N/A

3. CT2148 True-up Related Adjustments:

Year	PA Item #	CT 2148 True-up Related Adjustment Description	Amount	Year Recorded in GL	PA Reported in Ref.4 (Y/N)
2021	7	CT 2149, Issue 1233 for prior period corrections	(7,665)	GL 2022, PA reverses 2022	N
2022	7	CT 2149, Issue 1233 for prior period corrections	7,665	GL 2022, PA reverses 2021	N
2021	8	CT 2149, Issue 1233 for prior period corrections	7,676	GL 2023, PA reverses 2023	N
2023	14	CT 2149, Issue 1233 for prior period corrections	(7,676)	GL 2023, PA reverses 2021	N/A
CT 2148, Issue 1233 Total			-		
2022	8	CT 2148, Issue 1309 for prior period corrections	(143)	GL 2023, PA reverses 2023	N
2023	10	CT 2148, Issue 1309 for prior period corrections	143	GL 2023, PA reverses 2022	N/A
2023	11	CT 2148, Issue 1309 for prior period corrections-on Feb 2023 bill, Adjustment of Class B Global Adjustment due to change in reported embedded generation for October 2022. Energy Portion	279	GL 2025, PA reverses 2025	N/A
CT 2148, Issue 1309 Total			279		
2021	6	CT 2148, Issue 1327 for prior period corrections	(39,594)	GL 2023, PA reverses 2023	N
2023	3	CT 2148, Issue 1327 for prior period corrections	39,594	GL 2023, PA reverses 2021	N/A
2022	5	CT 2148, Issue 1327 for prior period corrections	(36,776)	GL 2023, PA reverses 2023	N
2023	4	CT 2148, Issue 1327 for prior period corrections	36,776	GL 2023, PA reverses 2022	N/A
2022	6	CT 2148, Issue 1327 for prior period corrections	(8,424)	GL 2023, PA reverses 2023	N
2022	11	Reversal of CT 2148, Issue 1327	8,424	GL 2023, PA reverses 2023	N
2023	5	CT 2148, Issue 1327 for prior period corrections	8,424	GL 2023, PA reverses 2023	N/A
2023	6	CT 2148, Issue 1327 for prior period corrections	(8,424)	GL 2023, PA reverses 2022	N/A
2023	7	CT 2148, Issue 1327 for prior period corrections -on April 2023 bill, 2021 Energy booked in GL to GA only. Energy portion.	78,422	GL 2025, PA reverses 2025	N/A
2023	8	CT 2148, Issue 1327 for prior period corrections -on April 2023 bill, 2022 Energy booked in GL to GA only. Energy portion	75,262	GL 2025, PA reverses 2025	N/A
2023	9	CT 2148, Issue 1327 for prior period corrections -on July 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for December 2020, Energy booked in GL to GA only. Energy portion	(2,894)	GL 2025, PA reverses 2025	N/A
CT 2148, Issue 1327 Total			150,790		
2022	9	CT 2148, Issue 1357 for prior period corrections	(1,232)	GL 2023, PA reverses 2023	N
2023	13	CT 2148, Issue 1357 for prior period corrections	1,232	GL 2023, PA reverses 2022	N/A
2023	12	CT 2148, Issue 1357 for prior period corrections -on July 2023 bill, Adjustment of Class B Global Adjustment due to change in reported Class A load for December 2022. Energy portion.	3,065	GL 2025, PA reverses 2025	N/A
CT 2148, Issue 1357 Total			3,065		
2023	15	CT 2148, Issue 1347 for prior period corrections -on April 2023 bill, Adjustment of Class B Global Adjustment due to change in reported embedded generation for April 2023 Energy booked in GL to GA only.	(2,399)	GL 2025, PA reverses 2025	N/A
CT 2148 Total			151,734		

In Note 8 of Reference 3, Orangeville Hydro explained that the credit PA of \$200,868 included in the last approved balance is not to be reversed in EB-2023-0045 as the 2016 adjustment is the reversal to remove prior year end unbilled to actual revenue differences. Additionally, the credit PA of \$351 included in the last approved balance is also not to be reversed in EB-2023-0045 as this adjustment belongs to historical balances.

OEB staff has grouped the PAs in Accounts 1588 and 1589 related to CT 2148 Issues 1347, 1357 and 1307 in the table below.

CT2148	Account 1588 PA	Account 1589 PA	Year Recorded in Account 1588	Year Recorded in Account 1589
Issue 1309	(279)	279	2022	2023
Issue 1347	2,399	(2,399)	2023	2023
Issue 1357	(3,065)	3,065	2022	2023

Question(s):

- a) Please clarify why reversals of 2016 PAs were recorded in 2024, even though Orangeville Hydro confirmed in Note 8 of Reference 3 that these PAs should not be reversed.

Response

In September 2023, Orangeville Hydro received its OEB report Inspection of Group 1 Deferral and Variance Accounts 1588 and 1589, a 34-month process which began in December 2021. During this process, Orangeville Hydro staff worked with OEB staff in order to work through the GA workform process and required PAs. The results of this inspection indicated incorrectly that those 2016 PAs should not be reversed, which is what Orangeville Hydro confirmed in Note 8 of Reference 3. After its 2024 COS EB-2023-0045, Orangeville Hydro staff undertook a review of its remaining 1588 and 1589 balances, studied the 2026 Commodity Accounts Analysis Workform Instructions and determined that all PAs have to reverse in order for the LDC to remain whole.

- b) Please provide itemized explanations for the PAs reported in 2021 and 2022 but not reported in the OEB-approved 2024 GA Analysis Workform (Reference 3). These PAs are highlighted in Orange in OEB staff's summary tables.

Response

After its 2024 COS and OEB inspection process with regards to 1588/1589, OHL took a major undertaking to review its books and to ensure that all PA's were reversed from its DVA continuity.

In page 19 of OHL_2026_Managers summary_20251009, Orangeville Hydro explains the Class A customer re-bill that occurred for the period of December 2020 to November 2022. The increased Class A loads reported to the IESO resulted in a considerable reduction in Class B GA paid to the IESO, which was re-imbursed to OHL on its April 2023 IESO invoice. Orangeville Hydro had to re-run the Accounting Guidance for 2021 and 2022 to account for the increased Class A load.

CT148 Related Adjustments

2021 #1 and #4 - Amounts are different due to re-doing the full year Accounting Guidance.

2022 #1 and #4 - Amounts are different due to re-doing the full year Accounting Guidance.

- c) Please confirm the dollar amount of the 2021 CT 148 true-up PA as the reversal PA reported in 2024 (PA item #6) does not fully back out the PAs reported in 2021(2021 PA item #1 and #4).

Response

The 2021 CT 148 true-up is recorded in the 2024 GL.

2024	6	FY 2021 CT 148 in 2024 GL from 2024 COS	317,903	GL 2024, PA reverses 2025	N/A
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The FY 2021 CT 148 booked in the 2024 GL was incorrect. Technically, one could have booked a -317,903 and a +317,903 in the 2021 PA adjustments, which would amount to \$0.

- d) Please provide Orangeville Hydro's view on whether the 2023 PAs related to "CT 2148 Issue 1327" for 2020, 2021 and 2022 result in a rates retroactivity issue. If so, please provide comments on the four factors outlined in the OEB's retroactivity letter (as explained in OEB Staff-8).

Response

Please see response to OEB Staff-8 b).

- e) Please explain why the PAs related to CT 2148 Issues 1309 and 1357 were recorded in Account 1588 in 2022, while the corresponding PAs were recorded in Account 1589 in 2023.

Response

CT 2148 Issue 1309 was an adjustment of Class B Global Adjustment due to change in reported embedded generation for October 2022. The amount of \$422 was claimed on the February 2023 invoice. This amount was booked in the 2023 GL in Account 1589 only. The purpose of the 2023 PA is to remove the full amount from the 1589 FY2023 GL. The purpose of the 2022 PA is to split this amount into Account 1589 (\$143) and Account 1588 (\$279).

CT 2148 Issue 1357 was an adjustment of Class B Global Adjustment due to change in reported Class A load for December 2022. The amount of \$4,297 was claimed on the July 2023 invoice. This amount was booked in the 2023 GL in Account 1589 only. The purpose of the 2023 PA is to remove the full amount from the 1589 FY2023 GL. The purpose of the 2022 PA is to split this amount into Account 1589 (\$1,232) and Account 1588 (\$3,065).

- f) Please provide an updated Commodity Accounts Analysis Workform, if

applicable.

[Response](#)

There are no updates required for the [Commodity Accounts Analysis Workform](#).

OEB Staff-12

Ref. 1: 2026 Commodity Accounts Analysis Workform, Principal Adjustments Tab

Ref. 2: 2026 Commodity Accounts Analysis Workform, GA 2024 Tab

Ref. 3: 2026 Commodity Accounts Analysis Workform, GA 2023 Tab

Preamble:

OEB staff has outlined the reporting differences between the 2024 PAs reported in Account 1589 between References 1 and 2 in the table below.

Principal Adjustments	Amount Reported in Ref. 1	Amount Reported in Ref. 2	Variances
Remove FY2020 CT 148 TU booked in 2024 GL	605,187	605,187	-
FY 2020 CT 148 in 2024 GL	(304,017)	(304,017)	-
FY 2021 CT 148 in 2024 GL	317,903	317,903	-
2016 1st GA to final GA	200,868	-	200,868
2016 Difference in GA IESO posted rate and rate paid	351	-	351
CT 148 true-up of GA Charges based on actual Non-RPP volumes	22,402	22,402	-
Total	842,694	641,475	201,219

In Reference 3, Orangeville Hydro reported a reconciling item of \$4,224 for Issue 1327 related to Class B Global Adjustment due to change in reported Class A load for December 2020, noting that this should not be considered as a PA as this is related to 2020 CT 2148. However, OEB staff notes in the same reference, a credit PA of \$2,894 is reported related to the same issue 1327 for the change in reported Class A load.

Question(s):

- a) Please explain the reporting variances noted by OEB staff related to the 2024 PAs.

- i. Please provide an updated Commodity Accounts Analysis Workform and 2026 Rate Generator Model, if applicable.

Response

In September 2023, Orangeville Hydro received its OEB report Inspection of Group 1 Deferral and Variance Accounts 1588 and 1589, a 34-month process which began in December 2021. During this process, Orangeville Hydro staff worked with OEB staff in order to work through the GA workform process and required PAs. The results of this inspection indicated incorrectly that those 2016 PAs should not be reversed, which is what Orangeville Hydro confirmed in Note 8 of Reference 3. After its 2024 COS EB-2023-0045, Orangeville Hydro staff undertook a review of its remaining 1588 and 1589 balances, studied the 2026 Commodity Accounts Analysis Workform Instructions and determined that all PAs have to reverse in order for the LDC to remain whole. There is no need for an update of the Workform or Model.

- b) Please confirm OEB staff’s observation regarding the 2023 reconciling items related to Class B Global Adjustment.
 - i. Please explain why only a portion (\$4,224) of CT 2148 Issue 1327 is recorded as a reconciling item.

Response

The CT 2148 Issue 1327 related to December 2020 was an amount of \$4,224 which was booked to Account 1589 only. The amount of (\$2,894) is the portion of CT 2148 which belongs to 1588 Energy.

2023	Current year principal adjustments	
1	CT 148 true-up of GA Charges based on actual Non-RPP volumes	
2	Unbilled to actual revenue differences	
3	CT 2148, Issue 1327 for prior period corrections	39,594 GL 2023, PA reverses 2021
4	CT 2148, Issue 1327 for prior period corrections	36,776 GL 2023, PA reverses 2022
5	CT 2148, Issue 1327 for prior period corrections	6,424 GL 2023, PA reverses 2023
6	CT 2148, Issue 1327 for prior period corrections	(8,424) GL 2023, PA reverses 2022
7	CT 2148, Issue 1327 for prior period corrections	78,422 GL 2025, PA reverses 2025
8	CT 2148, Issue 1327 for prior period corrections	75,262 GL 2025, PA reverses 2025
9	CT 2148, Issue 1327 for prior period corrections	(2,894) GL 2025, PA reverses 2025
10	CT 2148, Issue 1309 for prior period corrections	143 GL 2023, PA reverses 2022
11	CT 2148, Issue 1309 for prior period corrections	279 GL 2025, PA reverses 2025
12	CT 2148, Issue 1357 for prior period corrections	3,065 GL 2025, PA reverses 2025
13	CT 2148, Issue 1357 for prior period corrections	1,232 GL 2023, PA reverses 2022
14	CT 2143, Issue 1633 for prior period corrections	(7,670) GL 2023, PA reverses 2021
15	CT 2148, Issue 1347 for prior period corrections	(2,359) GL 2025, PA reverses 2025
16		
Total Current Year Principal Adjustments		221,804
Total Principal Adjustments to be Included on DVA Continuity Schedule/Tab 3 - IRM Rate Generator Model		221,804

2023	Current year principal adjustments	
1	CT 148 true-up of GA Charges based on actual RPP volumes	
2	Reversal of CT 1142/1142 true-up based on actuals	
3	Unbilled to actual revenue differences	
4		
5		
6		
7		
8		
9	CT 2148, Issue 1327 for prior period corrections	2,894 GL 2025, PA reverses 2025
10		
11		
12		
13		
14		
15	CT 2148, Issue 1347 for prior period corrections	2,359 GL 2025, PA reverses 2025
16		
Total Current Year Principal Adjustments		5,293
Total Principal Adjustments to be Included on DVA Continuity Schedule/Tab 3 - IRM Rate Generator Model		5,293

- c) Based on the OEB instructions provided for the reconciling items (as explained in OEB Staff-10), please confirm whether any of the reported principal adjustments in Account 1589 should instead be reported as reconciling items.

Response

Orangeville Hydro does not believe that any reported principal adjustments in Account 1589 should instead be reported as reconciling items. The only reconciling item that is included is the FY 2023 1588 reconciling item as referenced in Staff Question #10.

- i. Please update the 2026 Commodity Accounts Analysis Workform, if applicable.

[Response](#)

No adjustments are required on the 2026 Commodity Accounts Analysis Workform.

OEB Staff-13

Ref. 1: Manager’s Summary, p. 23

Ref. 2: O. Reg. 153/23

Preamble:

In Reference 1, Orangeville Hydro provided a summary table (Table 21) of 2025 IESO claims.

Table 21 – Summary of 2025 IESO Claims

(78,418)	FY 2021 CT 1142 Payable to IESO - to be claimed in 2025
317,726	FY 2022 CT 1142 Receivable from IESO - to be claimed in 2025
(122,147)	FY 2024 CT 1142 Paid to the IESO - claimed in January and February 2025
117,162	Total

Orangeville Hydro stated that the cause for these claims is due to the Class A customer re-bill. Orangeville Hydro requested an OEB order to grant an exception to the IESO two-year limitation period and interim disposition of its Accounts 1588 and 1589 balances on an interim basis for the period of 2021 to 2024.

According to Reference 3, the provision of the two-year limitation is not applicable to RPP settlements, section 79.16 of the *Ontario Energy Board Act, 1998*.

Question(s):

- a) Please confirm whether Orangeville Hydro’s requested OEB order is only subject to the FY 2021 CT 1142 and FY2022 CT 1142-related claims.
 - i. If so, please explain why Orangeville Hydro has not submitted the claims to the IESO, specifically given that the RPP true-up are not subject to the two-year limitation period.

[Response](#)

Orangeville Hydro confirms that its requested OEB order was only subject to the FY 2021 CT1142 and FY 2022 CT1142-related claims. Orangeville Hydro has submitted the claims to the IESO in January 2026 (December 2025 submission).

- b) Please provide supporting calculations for the proposed claims, broken down by account and year.

[Response](#)

The claims for Account 1588 FY 2021 CT1142 are as follows:

FY 2021 CT1142 Summary	
Paid to IESO in February 2022	(383,385)
Claimed from IESO in November 2024	76,368
Payable to IESO December 2025	(78,418)
Revised Accounting Guidance, payable to IESO	(385,435)

The claims for Account 1588 FY 2022 CT1142 are as follows:

FY 2022 CT1142 Summary	
Paid to IESO in February 2023	(286,671)
Receivable from IESO December 2025	317,727
Revised Accounting Guidance, receivable from IESO	31,056

- c) Please clarify whether the claims listed in Table 21 are incorporated in the requested disposition balance of Accounts 1588 and 1589.
 - i. If not, please explain why not.

Response

Orangeville Hydro confirms that the claims listed in Table 21 are incorporated in the requested disposition balance of Accounts 1588 and 1589.

- d) Please provide a detailed explanation for why Orangeville Hydro requested interim disposition for Accounts 1588 and 1589 up to 2024.

Response

Orangeville Hydro believes that all 1589 and 1588 balances should be disposed on an interim basis. If there are no changes to the last approved interim balance, then they are final disposition. On page 3 of the May 7, 2025 Instructions for Completing Commodity Accounts Analysis Workform (formerly “GA Analysis Workform”) – 2026 Rates, it states that:

- b) Under Note 1, select the appropriate year that the account 1589 and 1588 balances were last approved for disposition.
 - i) A Workform or workforms will be generated from the year after the GA balance was last disposed, unless there are changes to the last approved interim balance. If there was a change to an approved interim balance, a Workform will be generated for each year after the GA balance was last disposed on a final basis. The Workform for the year where there was a change in the approved interim balance will need to be revised and resubmitted, and a detailed explanation for the reason for the change should also be provided.

OEB Staff-14

Ref. 1: 2026 IRM Rate Generator Model, Tab 6

Ref. 2: EB-2023-0045, Settlement Proposal, 2024 DVA Continuity Schedule, Tab 6

Preamble:

In Item 3a of Reference 1, Orangeville Hydro reported 4 transition customers during 2021-2024. However, in Item 3a of Reference 2, 8 transition customers were reported for 2021-2022.

Question(s):

- a) Please confirm and explain the reporting variances between Reference 1 and Reference 2 related to the number of transition customers reported for 2021 and 2022.
 - i. Please provide an updated 2026 Rate Generator Model, if applicable.

Response

Orangeville Hydro confirms there are no differences between the number of transition customers reported for 2021 and 2022 in the two referenced models. There were two transition customers in 2021 and two transition customers in 2022 in both models.

Ref. 1: 2026 IRM Rate Generator Model, Tab 6

2022		2021	
July to December	January to June	July to December	January to June
1,729,603	852,596	250,616	157,275
3,674	2,138	943	589
B	B	B	B
1,562,310	1,609,439	1,521,794	1,749,293
4,579	4,565	4,362	4,711
A	B	B	A
1,344,300	1,952,181	2,097,353	2,196,755
5,762	5,917	6,480	6,634
A	A	A	B
1,444,626	1,230,671	1,200,736	1,006,184
4,335	3,871	4,038	4,036
A	B	B	B

Ref. 2: EB-2023-0045, Settlement Proposal, 2024 DVA Continuity Schedule, Tab 6

2022		2021	
July to December	January to June	July to December	January to June
1,693,536	2,391,020	2,467,856	2,559,489
5,036	5,227	5,112	5,372
A	A	A	A
13,100,952	12,153,645	12,041,495	10,778,120
22,062	21,025	21,167	18,618
A	A	A	A
2,257,603	2,444,057	2,572,216	2,849,571
3,992	4,262	4,609	5,022
A	A	A	A
7,486,214	7,343,662	6,911,895	6,702,245
12,160	12,188	11,676	11,438
A	A	A	A
5,435,622	5,760,619	5,581,720	5,970,418
10,218	10,272	10,458	10,211
A	A	A	A
1,562,310	1,609,439	1,521,794	1,749,293
4,579	4,565	4,362	4,711
A	B	B	A
-	-	-	-
-	-	-	-
1,344,300	1,952,181	2,097,353	2,196,755
5,762	5,917	6,480	6,634
A	A	A	B
1,444,626	1,230,671	-	-
4,335	3,871	-	-
A	B		

OEB Staff-15

Ref. 1: 2026 IRM Rate Generator Model, Tab 6.1a

Ref. 2: EB-2023-0045, Settlement Proposal, 2024 DVA Continuity Schedule, Tab 6.1a

Preamble:

In Reference 1, Orangeville Hydro reported non-RPP consumption less WMP consumption of 125,772,959 kWh for 2021. However, in Reference 2, a total non-RPP consumption less WMP consumption of 127,390,642 kWh was reported for 2021.

Question(s):

- a) Please confirm and explain the reporting variances between Reference 1 and Reference 2 related to the non-RPP consumption less WMP consumption reported in Item 3a.
 - i. Please provide an updated 2026 Rate Generator Model and 2026 Commodity Accounts Analysis Workform, if applicable.

Response

Orangeville does not confirm the inconsistencies as outlined in the preamble. In Reference 2, EB-2023-0045 Settlement Proposal model, Orangeville Hydro reported non-RPP consumption less WMP consumption of 125,772,959 for 2021. In Reference 1, 2026 IRM model, Orangeville Hydro reported non-RPP consumption less WMP consumption of 127,390,642 for 2021. This is the correct amount, and corresponds with the 2026 Commodity Accounts Analysis Workform.

The reporting variance is due to the Class A customer re-bill that occurred for 2021. Orangeville Hydro had

to amend its RRR 2.1.5 filing for 2021.

No changes to the 2026 IRM Rate Generator Model, Tab 6.1a or the 2026 Commodity Accounts Analysis Workform are required.

2026 Commodity Accounts Analysis Workform



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

Year		2021	
Total Metered excluding WMP	C = A+B	258,157,390	kWh
RPP	A	130,766,748	kWh
Non RPP	B = D+E	127,390,642	kWh
Non-RPP Class A	D	62,281,669	kWh
Non-RPP Class B*	E	65,108,973	kWh

2026 IRM Rate Generator Model, Tab 6.1a

Year the Account 1589 GA Balance Last Disposed

Allocation of total Non-RPP Consumption (kWh) between Current Class B and Class A/B Transition Customers

		Total	2024	2023	2022	2021
Non-RPP Consumption Less WMP Consumption	A	510,783,706	126,965,823	126,663,424	129,763,817	127,390,642
Less Class A Consumption for Partial Year Class A Customers	B	12,494,027	2,410,769	3,229,676	3,006,936	3,846,646
Less Consumption for Full Year Class A Customers	C	248,203,757	62,786,571	63,618,751	63,363,412	58,435,023
Total Class B Consumption for Years During Balance Accumulation	D = A-B-C	250,085,922	61,768,483	59,814,997	63,393,469	65,108,973
All Class B Consumption for Transition Customers	E	16,816,302	2,859,317	2,201,316	5,422,309	6,333,361
Transition Customers' Portion of Total Consumption	F = E/D	6.72%				

**OEB Staff-16
Question(s):**

- a) Given the amount of reporting inconsistencies identified by OEB staff in the current application, please provide Orangeville Hydro's view on requesting interim disposition of its Group 1 DVA balances as of December 31, 2024.

Response

Orangeville Hydro has experienced a number of complexities over the past several years related to its Group 1 DVA balances, specifically Accounts 1588 and 1589. These issues originated from a Class A settlement error in 2017, which created challenges in properly allocating Energy and Global Adjustment costs during the period in which Orangeville Hydro was not reimbursed by the IESO.

As a result of this error, the OEB initiated an inspection of Accounts 1588 and 1589. The inspection did not commence until December 2021 and was not formally closed until September 2023. In addition, a related OEB Compliance review was not completed until January 2025. While the inspection process provided Orangeville Hydro with additional clarity on the correct completion of the Commodity Accounts Workform, it still resulted in Principal Adjustments that should have been reversed in order to ensure that the utility was kept whole.

Additionally, in 2023, the Class A customer meter multiplier change created another complexity. Orangeville Hydro re-ran the Accounting Guidance for each month between December 2020 to November 2022, which resulted in original principal adjustments being reversed and new principal adjustments being calculated, along with the accurate treatment of CT 2148.

Throughout this process, Orangeville Hydro has identified several key lessons learned, which will support improved accuracy and control when completing DVA dispositions on a one-year basis going forward.

Interim DVA disposition is being requested as part of this 2026 IRM application due to changes to historical DVA balances and the reversal of prior-year Principal Adjustments into 2025. Orangeville Hydro is therefore seeking to ensure that all balances are accurately reversed and properly reflected in the 2025 GL prior to those balances being approved as final.