

Ms. Christine Long
Registrar & Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

June 11, 2020

**EB-2020-0133 Consultation on the Deferral Account
Pollution Probe Comments on the Draft Issues List**

Dear Ms. Long:

In accordance with the Board's letter dated May 14, 2020 and clarification letter dated June 4, 2020, please find below Pollution Probe's comments related to the Draft Issues List and Issue 1A for the above-noted proceeding. Pollution Probe has not included substantive comments relating to other issues in this submission and understands that opportunity will be provided at a later date.

Pollution Probe does not have detailed changes to the Draft Issues List and believes it is generally sufficient to cover the relevant issues. There was a suggestion during the Stakeholder Meeting May 28, 2020 that net costs that should be used in the account after appropriate mitigation and benefits have been applied. To simplify this process, Pollution Probe suggests using "net costs" rather than "costs" in each issue to recognize that these are the net costs after mitigation and benefits are applied. Accounting details for this can be decided during the consultation and at the time of account clearance, the utility would be able to provide supporting details on what mitigation and benefits were applied to reduce the overall net costs to Ratepayers.

Pollution Probe is aware that utilities have already been prioritizing activities and reallocating Ratepayer funding to mitigate some of the cost impacts related to COVID-19. These proactive actions will go a long way to minimize any incremental Ratepayer costs.

Should the OEB provide advanced policy direction in the near term (for example at the time of establishing the Final Issues list), to provide greater certainty with respect to the recoverability of amounts tracked in the Account, such as by confirming the recoverability of any incremental bad debt expense?

Pollution Probe suggests that advance policy direction to govern recoverability of amounts tracked in the Account is not appropriate prior to consultation through this proceeding. One of the purposes of this proceeding is to set the rules related to those accounts and predetermination of those rules would be counter to the intent of the consultation in Pollution Probe's view. Prior OEB direction and decisions on deferral accounts can act as a sound guide in the interim. Clarity on procedures could be provided by the OEB which would not prejudice future clearance of the account.

Financial solvency of utilities is important and issues that require a more immediate discussion and resolution can be identified early in the process and can be prioritized on that basis.



150 Ferrand Drive, Suite 208
Toronto, Ontario M3C 3E5
T 416.926.1907 F 416.926.1601
www.pollutionprobe.org

Respectfully submitted on behalf of Pollution Probe.

Michael Brophy, P.Eng., M.Eng., MBA
Michael Brophy Consulting Inc.
Consultant to Pollution Probe
Phone: 647-330-1217
Email: Michael.brophy@rogers.com

cc: Parties to the Consultation (via email)
Richard Carlson, Pollution Probe (via email)