

September 24, 2020

VIA RESS

Ms. Christine E. Long
Registrar & Board Secretary
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Dear Ms. Long:

Re: EB-2020-0133: Consultation on the Deferral Account – Impacts Arising from the COVID-19 Emergency.

Association of Major Power Consumers in Ontario (AMPCO) and Industrial Gas Users Association (IGUA) Comments on Form of Consultation.

We write as legal counsel to AMPCO and IGUA.

By letter dated July 17, 2020, the Board alerted stakeholders registered in this consultation process of its revised plan for next steps in the consultation. The Board advised that OEB Staff would prepare a preliminary proposal (Staff Proposal) addressing potential guidance anticipated to be the outcome of this process, not to pre-determine that outcome but rather to facilitate and focus stakeholder comments. The Board also indicated in its July 17th letter that it welcomed comments from stakeholders on the form of consultation to be adopted once the Staff Proposal has been issued.

This letter provides comments from AMPCO and IGUA on the form of consultation, and suggestions on the presentation of data in support thereof.

Process Comments

The Board Approved issues list addresses a broad range of issues and views engaged in this process, which issues and views arise from significant and in many ways unprecedented circumstances and regulatory considerations. Given the breadth and singularity of the issues to be addressed, AMPCO and IGUA suggest:

1. A further Stakeholder Conference, this one focussed on clarifying and understanding the Staff Proposal.

2. Provision for the submission of written questions in advance of such Stakeholder Conference, not mandatory but in order to provide an opportunity for parties to raise issues and questions for OEB Staff to consider in advance of, and for response during, the Stakeholder Conference so that responses and discussion can be considered and duly informed.
3. Two rounds of submissions from parties following the Stakeholder Conference, structured in the same manner as comments were received on the draft issues list following the May 28th stakeholder meeting (i.e. written comments followed by reply comments).

Data Presentation

The Board's July 17th letter also indicates that account data reporting consisting of balances recorded is expected to inform a preliminary analysis by OEB Staff in support of the Staff Proposal. AMPCO and IGUA suggest that the following breakdown of cost/revenue impacts would assist all stakeholders in considering the resulting proposal:

- Revenue impacts from COVID driven loss of load (and the basis for so determining).
- Revenue impacts from COVID driven bad debt (and the basis for so determining).
- Costs of implementing regulatory directives.
- Savings resulting from COVID driven cost and/or activity level reductions (and the basis for so determining).
- Other cost/revenue impacts (particularized to the extent possible).

Further disaggregation of the data by customer segment (residential, commercial, institutional, industrial) where applicable might also assist.

Conclusion

AMPCO and IGUA appreciate the Board's consideration of this input.

Yours truly,



Ian A. Mondrow

- c. Colin Anderson (AMPCO)
Dr. Shahrzad Rahbar (IGUA)