

# 2022 Cost of Service Checklist

London Hydro Inc.

EB-2021-0041

Filing Requirement Page # Reference		Date:	Evidence Reference, Notes (Note: if requirement is not applicable, please provide reasons)
<b>GENERAL REQUIREMENTS</b>			
Ch 1, Pg. 2	Certification by a senior officer that the evidence filed is accurate, consistent and complete		Exhibit 1
Ch 1, Pg. 3-4	Confidential Information - Practice Direction has been followed		N/A
Ch 1, Pg. 4	Certification by a senior officer that the application and any evidence filed in support of the application does not include any personal information unless it is filed in accordance with Rule 9A of the OEB's Rules (and the Practice Direction, as applicable).		Exhibit 1
Ch 2, Pg. 2	Statement identifying all deviations from Filing Requirements		N/A
2	Chapter 2 appendices in PDF and live Microsoft Excel format; PDF and Excel copy of current tariff sheet		Filed with application
3	If applicable, late applications filed after the commencement of the rate year for which the application is intended to set rates is converted to the following rate year.		N/A
3	If aligning rate year with fiscal year, application filed no later than the end of April of the year prior to the test year		N/A
4	Text searchable and bookmarked PDF documents		All Exhibits
5	Links within Excel models not broken and models names so that they can be identified (e.g. RRWF instead of Attachment A)		Filed with application
5	Materiality threshold; additional details below the threshold if necessary (for rate base, capital expenditures and OM&A)		Exhibit 3 & 4
<b>EXHIBIT 1 - ADMINISTRATIVE DOCUMENTS</b>			
<i>Table of Contents</i>			
6	Table of Contents listing major sections and subsections of the application. Electronic version of application appropriately bookmarked to provide direct access to each section		All Exhibits have TOC
<i>Executive Summary and Business Plan</i>			
6	Summary identifying key elements of the proposals and the Business Plan underpinning application, as guided by the Rate Handbook including plain language information about its goals		1.3 Executive Summary and Business Plan
<i>Customer Summary</i>			
7	Brief but complete summary of the application that will be posted as a stand-alone document on the OEB's website for review by the general public and be made available to customers of the applicant. Must include: main requests (with section references), description of impacts of requests, bill impact for customer at 750kWh as well as a typical consumer for a distributor's service area for each of the residential and small business customer classes (bill impacts to be based on commodity rates based on TOU and reg. charges held constant)		5.0 Customer Summary
<i>Administration</i>			
7	Primary contact information (name, address, phone, fax, email)		6.3.3 Primary Application Contact:
7	Identification of legal (or other) representation		6.3.4 Legal or Other Representation for the Application:
7	Applicant's internet address for viewing of application and any social media accounts used by the applicant to communicate with customers		6.3.5 Applicant's internet address for viewing:
7	Statement identifying where notice should be published and why		6.5 STATEMENTS AS TO WHO IS AFFECTED BY APPLICATION AND PUBLICATION
7	Bill impacts - distribution only impacts for 750 kWh residential and 2000 kWh GS<50 (sub-total A of Tariff Schedule and Bill Impact Spreadsheet Model) to be used for notice; proposed bill impacts based on alternative consumption profiles and customer groups as appropriate given consumption patterns of a distributors customers		6.6 BILL IMPACTS FOR PUBLIC NOTICE OF APPLICATION
7	Form of hearing requested and why		6.7 STATEMENT OF REQUESTED HEARING FORM
7	Requested effective date		6.8 RATE ORDER REQUIREMENT FOR IMPLEMENTATION
8	Statement identifying and describing any changes to methodologies used vs previous applications		6.9 STATEMENT IDENTIFYING AND DESCRIBING ANY CHANGES TO
8	Identification of OEB directions from any previous OEB Decisions and/or Orders. The applicant must clearly indicate how these are being addressed in the current application (e.g., filing of a study as directed in a previous decision)		6.10 IDENTIFICATION OF OEB DIRECTIONS FROM ANY PREVIOUS OEB DECISIONS
8	Reference to Conditions of Service - LDC does not need to file Conditions of Service, but must provide reference to website and confirm version is current; identify if there are changes to Conditions of Service (a) since last CoS application or (b) as a result of the current application. Confirmation that there are no rates and charges linked in the Conditions of Service that are not in the distributor's Tariff of Rates and Charges must be provided		6.11 CONDITIONS OF SERVICE
8	Description of the corporate and utility organizational structure, showing the main units and executive and senior management positions within the utility. Include a corporate entities relationship chart, showing the extent to which the parent company is represented on the utility company's Board of Directors and a description of the reporting relationships between utility and parent company management. Also include any planned changes in corporate or operational structure, including any changes in legal organization and control		6.13 CORPORATE AND UTILITY ORGANIZATIONAL STRUCTURE

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8	List of approvals requested (and relevant section of legislation). All approvals including accounting orders, new rate classes, revised specific service charges or retail service charges which the distributor is seeking, must be separately identified in Appendix 2-A and clearly documented in the appropriate sections of the application - a PDF copy of Appendix 2-A should be provided in this section		6.14 LIST OF SPECIFIC APPROVALS REQUESTED
<b>Distribution System Overview</b>			
8	Description of Service Area (including map, communities served)		7.0 DISTRIBUTION SYSTEM OVERVIEW
8 & 9	Description of whether the distributor is a host distributor and/or embedded distributor. Identification of embedded and/or host distributors; if partially embedded provide %load from host distributor. If the distributor is a host, the applicant should identify whether there is a separate Embedded Distributor customer class or if any embedded distributors are included in other customer classes such as GS > 50 kW		7.0 DISTRIBUTION SYSTEM OVERVIEW
9	Statement as to whether or not the distributor has had any transmission or high voltage assets deemed by the OEB as distribution assets and whether or not there are any such assets the distributor is seeking approval for in this application		N/A
<b>Application Summary</b>			
At a minimum, the items below must be provided. Applicants must also identify all proposed changes that will have a material impact on customers.			
9	Revenue Requirement - service RR, increase/decrease (\$ and %) from change from previously approved and main drivers		8.2 REVENUE REQUIREMENT
9	Budgeting and Accounting Assumptions - economic overview (such as growth and inflation), and identification of accounting standard used for test year and brief explanation of impacts arising from any change in standards		8.3 Budgeting and Accounting Assumptions
9	Load Forecast Summary - load and customer growth, % change in kWh/kW and customer numbers from last OEB-approved, description of forecasting method(s) used for customer/connection and consumption/demand		8.4 LOAD FORECAST SUMMARY
9 & 10	Rate Base and DSP - major drivers of DSP, rate base for test year, change in rate base from last approved (\$ and %), capital expenditures requested for the test year, change in capital expenditures from last approved (\$ and %), summary of costs requested for renewable energy connections/expansions, smart grid, and regional planning initiatives, any O.Reg 339/09 planned recovery		8.5 CAPITAL PLAN (DSP) AND RATE BASE
10	OM&A Expense - OM&A for test year and change from last approved (\$ and %), summary of drivers and cost trends, inflation assumed, total compensation for test year and change from last approved (\$ and %).		8.5.5 Operations, Maintenance and Administration Expense
10	Cost of Capital - summary table showing proposed capital structure and cost of capital parameters used in WACC. Statement regarding use of OEB's cost of capital parameters; summary of any deviations		8.5.6 Cost of Capital
10	Cost Allocation & Rate Design - summary of any deviations from OEB methodologies, significant changes proposed to revenue-to-cost ratios and fixed/variable splits and summary of proposed mitigation plans		8.6 Cost Allocation and Rate Design
10	Deferral and Variance Accounts - total disposition (RPP and non-RPP), disposition period, new accounts requested and any requested discontinuation of existing DVAs		8.7 Deferral and Variance Accounts
10	Bill Impacts - total impacts (\$ and %) for all classes for typical customers		8.8 Bill Impacts
<b>Customer Engagement</b>			
10 & 11	Discussion on how customers were informed of the proposals being considered for inclusion in the application and the value of those proposals to customers i.e. costs, benefits, and the impact on rates		9.0 Customer Engagement
11	Discussion of any feedback provided by customers and how the feedback shaped the final application		9.0 Customer Engagement
11	Impact of customer engagement activities on the development of the capital plan are to be filed as part of the capital plan requirements in Chapter 5		9.0 Customer Engagement
11	Reference to any other communication sent to customers about the application i.e. bill inserts, town hall meetings or other forms of out reach and the feedback received from customers through these engagement activities. Provide summary of feedback received through engagement activities.		9.0 Customer Engagement
11	Complete Appendix 2-AC Customer Engagement Activities Summary - explicit identification of the outcomes of customer engagement in terms of the impacts on the distributor's plans, and how that information has shaped the application		9.0 Customer Engagement
11	All responses to matters raised in letters of comment filed with the OEB		9.0 Customer Engagement
<b>Performance Measurement</b>			
11 & 12	Discussion of performance for each of the distributor's scorecard measures over the last five years; drivers for its performance, plans for continuous improvement currently and going forward		10.0 Performance Measurement
12	Identify performance improvement targets, forecast of efficiency assessment using the PEG forecasting model for the test year, discussion on how the results obtained from the PEG model has informed the business plan and application		1.3 Executive Summary and Business Plan
12	Activity and Performance-based Benchmarking (APB) results - discussion of performance for each of the ten programs and provide any immediate remedial actions distributor plans to take. Distributors may include how the APB results will influence future planning		1.3 Executive Summary and Business Plan
<b>Facilitating Innovation</b>			
13	In order to support the OEB's consideration of its new objective to facilitate innovation in the electricity sector, it would be helpful for distributors to include in their cost-based applications a description of the ways that their approach to innovation have shaped the proposals in the application. This could include an explanation of its approach to innovation in its business more generally, or related to specific projects, including enabling characteristics or constraints in its ability to undertake innovative solutions for enhancing the provision of distribution services in a way that benefits customers.		1.3.7 Innovation
<b>Financial Information</b>			
13	Non-consolidated Audited Financial Statements for 3 most recent historical years (i.e. 2 years statements must be filed, covering 3 years of historical actuals)		11.0 Financial Information

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13	Detailed reconciliation of AFS with regulatory financial results filed in the application, including a reconciliation of the fixed assets in order to, as one example, separate non-distribution business. This must include identification of any deviations that are being proposed between AFS and regulatory financial results, including the identification of any prior OEB approvals for such deviations	11.0 Financial Information
13	Annual Report and MD&A for most recent year of distributor and parent company, as available and applicable	11.0 Financial Information
13	Rating Agency Reports, if available; Prospectuses, etc. for recent and planned public issuances	11.0 Financial Information
13	Any change in tax status	11.0 Financial Information
13	Existing accounting orders and departures from these orders, as well as any departures from the USoA	11.0 Financial Information
13	Accounting Standards used for financial statements and when adopted	11.0 Financial Information
13 & 14	Confirmation that accounting treatment of any non-utility business has segregated activities from rate regulated activities	11.0 Financial Information
<i>Distributor Consolidation</i>		
14	If a distributor has acquired or amalgamated with another distributor, identify any incentives that formed part of the acquisition or amalgamation transaction if the incentive represents costs that are being proposed to remain or enter rate base and/or revenue requirement. A distributor must specify whether any commitments made to shareholders are to be funded through rates	N/A
14	List of exhibits in application in which incentives are discussed	N/A
14	Description of actual savings as a result of consolidation compared to what was in the approved consolidation application and explanation of how savings are sustainable and the efficacy of any rate plan approved as part of the MAADs application	N/A

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14	Identify approved ACM or ICM from a previous Price Cap IR application it proposes be incorporated into rate base	N/A
<b>EXHIBIT 2 - RATE BASE</b>		
<i>Overview</i>		
15	Completed Fixed Asset Continuity Schedule (Appendix 2-BA) - in Application and Excel format	Exhibit 2, Appendix 2-1 Chapter 2 Appendices Excel workbook
15	For rate base, must include opening and closing balances, average of opening and closing balances for gross assets and accumulated depreciation (discussion of methodology if applicant uses an alternative method); working capital allowance (historical actuals, bridge and test year forecast)	Table 2-1, Table 2-8
15	Continuity statements (year end balance, including interest during construction and overheads). Explanation for any restatement (e.g. due to change in accounting standards) Year over year variance analysis; explanation where variance greater than materiality threshold Hist. OEB-Approved vs Hist. Actual (for the most recent historical OEB-approved year) Hist. Act. vs. preceding Hist. Act. (for the relevant number of years) Hist. Act. vs. Bridge Bridge vs. Test	Exhibit 2, Appendix 2-1 Chapter 2 Appendices Excel workbook Table 2-8 (Summary of Continuity Schedules) Variance Analysis - Section 2.1.1
15	Opening and closing balances of gross assets and accumulated depreciation must correspond to fixed asset continuity statements. If not, an explanation must be provided (e.g. CWIP, ARO). Reconciliation must be between net book value balances reported on Appendix 2-BA and balances included in rate base calculation	Exhibit 2, Appendix 2-1 Chapter 2 Appendices Excel workbook Table 2-8 (Summary of Continuity Schedules)
16	Distributor may include in-service balances previously recorded in DVAs, such as MIST meters or renewable generation/smart grid related accounts, in its opening test year property, plant and equipment balances, if these costs have not been previously reviewed and approved for disposition, but disposition is being requested in this application. In this situation, the distributor must clearly show in its evidence (e.g. Appendix 2-BA) that the addition was included in the opening test year balances and must reconcile the closing bridge year and opening test year figures. Distributors must provide the same reconciliation for accumulated depreciation	Exhibit 2, Appendix 2-1 Chapter 2 Appendices Excel workbook Table 2-8 (Summary of Continuity Schedules)
<i>Gross Assets - PP&amp;E and Accumulated Depreciation</i>		
16	Breakdown by function (transmission or high voltage plant, distribution plant, general plant, other plant) for required statements and analyses	Table 2-10
16	Breakdown by major plant account for each functionalized plant item; for test year, each plant item must be accompanied by description	Table 2-10
16	Summary of approved and actual costs for any ICM(s) and/ or ACM approved in previous IRM applications	Section 2.7
16	Continuity statements must reconcile to calculated depreciation expenses under Exhibit 4 and presented by asset account	Table 2-9
16	All asset disposals clearly identified in the Chapter 2 Appendices for all historical, bridge and test years	Table 2-8 (Summary of Continuity Schedules)
<i>Allowance for Working Capital</i>		
16 & 17	Working Capital - 7.5% allowance or Lead/Lag Study or Previous OEB Direction	Section 2.3
17	Lead/Lag Study - leads and lags measured in days, dollar-weighted	n/a
17	Cost of Power must be determined by split between RPP and non-RPP Class A and Class B customers based on actual data, use most current RPP (TOU) price, use current UTR. Calculation must include the impact of the most up to date Ontario Electricity Rebate, currently set at of 18.9% on the total bill. Distributors must complete Appendix 2-Z - Commodity Expense.	Chapter 2 Appendices Excel workbook
<i>Distribution System Plan and Capital Expenditures Summary</i>		
18	DSP filed as a stand-alone document; a discrete element within Exhibit 2	Section 2.4 Appendix 2-7
18	Overall summary of capital expenditures over the past five historical years, including the last OEB-approved amounts, as well as the bridge year and the test year. The summary must show capital expenditures, treatment of contributed capital, and additions and deductions from CWIP. As part of Exhibit 2, a distributor must also provide explanations of year-over-year variances and an explanation of the variance, if any, between the OEB-approved capital expenditure amount in the last rebasing year as compared to the actual expenditures for that year.	Table 2-20 Section 2.5.3
18	Complete Appendix 2-AB - four historical years must be actuals, forecasts for the bridge and test years; at a minimum, for historical years, applicants must provide actual totals for each DSP category.	Chapter 2 Appendices Excel workbook
<i>Policy Options for the Funding of Capital</i>		
18 & 19	Distributor may propose ACM capital project coming into service during Price Cap IR (a discrete project documented in DSP). Provide cost and materiality calculations to demonstrate ACM qualification	Section 2.6
18 & 19	Distributor must establish need for and prudence of these projects based on DSP information; identification that distributor is proposing ACM treatment for these future projects, preliminary cost information. The ACM Report provides further details on the information required.	Section 2.6
19	Complete Capital Module Applicable to ACM and ICM	Section 2.6 Appendix 2-2
<i>Addition of Previously Approved ACM and ICM Project Assets to Rate Base</i>		
19 & 20	Distributor with previously approved ACM(s) and/or ICM(s) - schedule of ACM/ICM amounts proposed to be incorporated into rate base. The distributors must compare actual capital spending with OEB-approved amount and provide an explanation for variances	Section 2.7
20	Balances in Account 1508 sub-accounts, reconciliation with proposed rate base amounts; recalculated revenue requirement should be compared with rate rider revenue	Section 9.4
20 & 21	Accelerated capital cost allowance (CCA) should not be reflected in the ACM/ICM revenue requirement associated with these projects. Distributors should include the impact of the CCA rule change associated with the ACM/ICM project(s) in Account 1592 - PILs and Tax Variances – CCA Changes sub-account for CCA changes	Section 9.4
<i>Capitalization Policy</i>		
21	Capitalization policy including changes since its last rebasing application. Must identify the changes and the causes of the changes.	Section 2.8 Appendix 2-4

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<b>Capitalization of Overhead</b>			
<b>21</b>	Appendix 2-D complete; identification of burden rates and burden rates prior to changes, if any		Section 2.9 Appendix 2-5
<b>Costs of Eligible Investments for the Connection of Qualifying Generation Facilities</b>			
<b>22 &amp; 23</b>	Generation Facilities - If applicable, proposal to divide the costs of eligible investments between the distributor's ratepayers and all Ontario ratepayers per O.Reg. 330/09. Request for rate protection exceeds the materiality threshold in section 2.0.8 of the Filing Requirements - Appendices 2-FA through 2-FC identifying all eligible investments for recovery		Section 2.10
<b>Service Quality</b>			
<b>23</b>	5 historical years of SQRs, explanation for any under-performance vs standard and actions taken. If available, any outcomes of such actions.		Section 2.11 Appendix 2-6
<b>23</b>	Completed Appendix 2-G; confirmation that the data is consistent with scorecard, or explanation of any inconsistencies		Chapter 2 Appendices Excel workbook
<b>Ch5 p5</b>	Where applicable, explanation for section headings other than Chapter 5 headings; cross reference table		Noted in Executive Summary (DSP page 7) - DSP follows same order as Ch 5, with Ch 5 Headings provided in parentheses for each section.
<b>Ch5 p5-6</b>	Distribution System Plan Overview - key elements, overview of how projects address customer preferences, sources of cost savings, period covered, vintage of information on investment drivers, changes to asset management process since last DSP filing, dependencies, projects related to grid modernization/distributed energy resources/climate change adaptation		1.1 Distribution System Plan Overview (5.2.1)
<b>Ch5 p6-7</b>	Coordinated Planning with 3rd parties - description of consultations - deliverables of the Regional Planning Process, or status of deliverables - relevant material documents provided to other participants in the process - IESO letter in relation to REG investments (Ch 5 p13) and Dx response letter		1.2 Coordinated Planning with Third Parties for Regional Planning (5.2.2)
<b>Ch5 p8-9</b>	Performance Measurement - identify and define methods and measures used to monitor DSP performance providing for each a brief description of its purpose, form (e.g. formula if quantitative metric) and driver (e.g. consumer, legislative, regulatory, corporate) - unit cost metrics for capital expenditures and O&M/customer, km of line, peak capacity as outlined in Appendix 5-A - summary of performance and trends over historical period. Must include SAIFI and SAIDI for all interruptions and all interruptions excluding loss of supply. Applicant should also provide a summary of Major Events that occurred since the last Cost of Service. For each cause interruption: Number of interruptions that occurred as a result of the cause of interruption, number of customer interruptions that occurred as a result of the cause of interruption, number of customer-hours of interruptions that occurred as a result of the cause of interruption. Explanation for any adverse deviations from trend of targets (including any established in a previously filed DSP) and any under-performance in SAIDI and SAIFI measures, and actions taken or to be taken to address the issues and any outcomes, if available. - explain how information has affected DSP		1.3 Performance Measurement for Continuous Improvement (5.2.3)
<b>Ch5 p9</b>	Realized efficiencies due to smart meters -documented capital and operating efficiencies realized as a result of the deployment and operationalization of smart meters and related technologies. Both qualitative and quantitative descriptions should be provided		1.4 Realized Efficiencies Due to Smart Meters (5.2.4)
<b>Ch5 p10</b>	Asset Management Process Overview - description of AM objectives/corporate goals and how Dx ranks objectives for prioritizing investments; Inputs/Outputs of the AM process and information flow for investments - flowchart accompanied by explanatory text recommended		2.1 Asset Management Process Overview (5.3.1)
<b>Ch5 p11</b>	Overview of Assets Managed - description of service area (including evolution of features in forecast period affecting DSP), - description of system configuration including length (km) of underground and overhead systems, number and length of circuits by voltage level, and number and capacity of transformer stations - service profile and condition by asset type (tables and/or figures) - date data compiled - assessment of degree the capacity of system assets is utilized		2.2 Overview of Assets Managed (5.3.2)
<b>Ch5 p12</b>	Asset Lifecycle Optimization - description of asset lifecycle optimization policies and practices, including asset replacement and refurbishment, maintenance planning criteria and assumptions - description of asset life cycle risk management policies and practices, assessment methods and approaches to mitigation		2.3 Asset Lifecycle Optimization Policies and Practices (5.3.3)
<b>Ch5 p12-13</b>	System Capability Assessment for REG - REG applications > 10 kW, number and MW of REG connections for forecast period, capacity of Dx to connect REG, connection constraints		2.4 System Capability Assessment for REG (5.3.4)
<b>Ch5 p13-14</b>	Capital Expenditure Plan - should set out and justify a distributor's proposed expenditures on its distribution system and (non-system) general plant over a five-year planning period, including investment and asset-related operating and maintenance expenditures. Distributors must provide overview of: customer engagement activities to obtain information on their preferences and how the results of assessing this information are reflected in the capital expenditure plan, how the distributor expects its system to develop over the next five years, including in relation to load and customer growth, climate change adaptation, grid modernization and/or the accommodation of forecasted REG projects		3.1 Capital Expenditure Plan (5.4)
<b>Ch5 p14-15</b>	Capital Expenditure Planning Process Overview - description of the analytical tools and methods used for risk management and its correlation to the capital expenditure plan - description of the process(es), tools and methods (including relevant linkages to the distributor's asset management process) used to identify, select, prioritize and pace the execution of projects/programs in each investment category - if different from that described above, the method and criteria used to prioritize REG investments - approach to assessing non-distribution system alternatives to relieving system capacity or operational constraints, including the role of Regional Planning Processes in identifying and assessing alternatives - strategy in taking advantage of opportunities that arise during system planning to implement cost-effective modernization of the distribution system (options, mechanisms that facilitate real time data and behind the meter services, investments necessary, adoption of innovative processes etc. - consideration of distribution rate funded CDM programs, that are not funded by the Global Adjustment Mechanism, to defer distribution infrastructure		3.1.1 Capital Expenditure Planning Process Overview (5.4.1)

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Ch5 p15-16	Rate-Funded Activities to Defer Distribution Infrastructure -CDM programs that target distributor-specific peak demand reductions to address a local constraint of the distribution system -demand response programs to reduce peak demand in order to defer capital investment -programs to improve the efficiency of the distribution system and reduce distribution losses -energy storage programs whose primary purpose is to defer specific capital spending for the distribution system		3.1.1.1 Rate-Funded Activities to Defer Distribution Infrastructure (5.4.1.1)
Ch5 p16-17	Capital Expenditure Summary - completed Appendix 2-AB for historical and forecast period - At a minimum, for historical years, applicants that have previously filed a DSP must provide the actual total expenditures in each DSP category. All years must be provided per the Chapter 5 investment categories. - description of the impacts of capital expenditures on O&M must be given for each year or a statement that the capital plans did not impact O&M costs - Explanations should be provided if there are material changes in the percentage a given investment category is of the total investment over the forecast period relative to actual spending over the historical period. In addition to the Plan vs. Actual variances for individual investment categories, explanations must be provided for the following: • Plan vs. Actual variances for the total plan for each year of the historical period • Variances in a given investment category that are trending much higher or lower over the historical period - Must also complete Chapter 2 Appendix 2-AA, along with explanations of variances by project or category, the proposed accounting treatments, a statement should be provided that there are no expenditures for non-distribution activities in the applicant's budget		3.2 Capital Expenditure Summary (5.4.2)
Ch5 p17	Justifying Capital Expenditures -filings must enable OEB to assess whether and how a distributor's DSP delivers value to customers, including by controlling costs in relation to its proposed investments through appropriate optimization, prioritization, and pacing of capital-related expenditures -distributors should also keep pace with technological changes and integrate cost-effective innovative projects and traditional planning needs such as load growth, asset condition and reliability		3.3 Justifying Capital Expenditures (5.4.3)
Ch5 p17-18	Overall Plan - comparative expenditures by category over historical period, forecast impact of system investment on O&M, drivers of investments by category including historical trend and expected evolution of each driver over the forecast period, information related to Dx system capability assessment		3.3.1 Overall Plan (5.4.3.1)
Ch5 p18-25	Material Investments - For each project that meets materiality threshold set in Ch 2 <u>General Information</u> - total capital and, where applicable, (non-capitalized) O&M costs proposed for recovery in rates - any capital contributions made or forecast to be made to a transmitter with respect to a Connection and Cost Recovery Agreement (must include initial forecast used to calculate contribution, amount of contribution (if any), true-up dates and potential true-up payments - customer attachments - dates - risks - variances - REG investments - Information on total capital and OM&A costs associated with REG investment, if any, included in a project/program; and a description of how the REG investment is expected to improve the system's ability to accommodate the connection of REG facilities.  <u>Evaluation criteria and information requirements for each project/program</u> - may include: efficiency, customer value, reliability, etc. See filing requirements for investment evaluation criteria and the qualitative or quantitative evidence that a distributor can use to demonstrate that an investment is consistent with these criteria  <u>Category specific requirements for each project</u> - category-specific information and analyses should be used to support a project/program (or elements thereof as applicable). - system access, system renewal, system service, general plant (as applicable) - see filing requirements for detailed discussion		3.3.2 Material Investments (5.4.3.2); DSP Appendix H, I and J
<b>EXHIBIT 3 - OPERATING REVENUE</b>			
<i>Load and Revenue Forecasts</i>			
23	Explanation of causes, assumptions and adjustments for volume forecast, including economic assumptions and data sources for customer and load forecasts		3.2.2 PURCHASED KWH FORECAST
23	Explanation of weather normalization methodology		3.2.2 PURCHASED KWH FORECAST
24	Completed Appendix 2-IB; the customer and load forecast for the test year must be entered on RRWF, Tab 10		RRWF, Tab 10
24 & 25	Multivariate Regression Model - rationale for choice, regression statistics (including explanation for any resulting unintuitive relationships), explanation of weather normalization methodology, sources of data for endogenous and exogenous variables (where a variable has been constructed, a complete explanation of the variable data used and source), any binary variables used to either account for individual data points or to account for seasonal or cyclical trends or for discontinuities in the historical data (where such variable has been used, explanation and justification must be provided), explanation of any specific adjustments made; data used in load forecast must be provided in Excel format, including derivation of constructed variables		3.2.2 PURCHASED KWH FORECAST
25	NAC Model - rationale for choice, data supporting NAC variables, description of accounting for CDM in historical period and how CDM impacts are factored into test year forecast), discussion of weather normalization considerations		3.2.3 BILLED KWH LOAD FORECAST
<i>CDM Adjustment for the Load Forecast for Distributors</i>			
26	CDM Adjustment - If a distributor expects impacts from any CFF-related projects not deployed by April 2019 but for which a distributor is contractually obligated to complete, or for other programs delivered by the distributor after April 2019, a distributor may include these amounts as part of a CDM manual adjustment to the 2022 load forecast but must ensure that sufficient supporting evidence is provided for all estimated CDM savings		N/A

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26	If a distributor proposes a CDM adjustment to its 2022 load forecast, it should document the CDM savings to be used as the basis for the 2022 LRAMVA threshold. In addition, the allocation of the CDM savings for the LRAMVA and the load forecast adjustment should be provided by customer class and for both kWh and, as applicable to a customer class, kW. The distributor should document its proposal adequately, including how CDM savings will be tracked and reported in order to account for differences between forecast revenue loss attributable to CDM activity embedded in rates and actual revenue loss due to the impacts of CDM programs	N/A
26	Appendix 2-I - is provided as one approach for calculating the aggregate amounts for the LRAMVA and the corresponding CDM adjustment to the load forecast.	N/A
<i>Accuracy of Load Forecast and Variance Analyses</i>		
26	Completed Appendix 2-IB	Chapter 2 Appendices Excel workbook
26	For customer/connection counts - identification as to whether customer/connection count is shown in year end or average format, year-over-year variances in changes of customer/connection counts with explanation of major changes, explanations of bridge and test year forecasts by rate class, for last rebasing variance analysis between last OEB-approved and actuals with explanations for material differences	3.3 Accuracy of Load Forecast and Variance Analyses
26 & 27	For consumption and demand - explanation to support how kWh are converted to kW for applicable demand-billed classes, year-over-year variances in kWh and kW by rate class and for system consumption overall (kWh) with explanations for material changes in the definition of or major changes over time (should be done for both historical actuals against each other and historical weather-normalized actuals over time), explanations of the bridge and test year forecasts by rate class, variance analysis between the last OEB-approved and the actual and weather-normalized actual results	3.3 Accuracy of Load Forecast and Variance Analyses
27	For revenues - calculation of bridge year forecast of revenues at existing rates; calculation of test year forecasted revenues at each of existing rates and proposed rates	3.3 Accuracy of Load Forecast and Variance Analyses
27	With respect to average consumption, for each rate class, distributors are to provide weather-actual and weather-normalized average annual consumption or demand per customer as applicable for the rate class for last OEB approved and historical, weather normalized average annual consumption or demand per customer for the bridge and test years, explanation of the net change in average consumption from last OEB-approved and actuals from historical, bridge and test years based on year-over-year variances and any apparent trends in data	3.3 Accuracy of Load Forecast and Variance Analyses
<i>Other Revenue</i>		
28	Completed Appendix 2-H	Chapter 2 Appendices Excel workbook

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28	Variance analysis (including explanations for significant variances) - year over year, historical, bridge and test		3.4 Other Revenues - contained in narrative under each USofA account
28	Any new proposed specific service charges, or proposed changes to rates or application of existing specific service charges		3.4 Other Revenues - contained in narrative under USofA 4235
28	Revenue from affiliate transactions, shared services, corporate cost allocation as described in 2.4.3.2. For each affiliate transaction, identification of the service, the nature of the service provided to affiliate entities, accounts used to record the revenue and associated costs (Appendix 2-N)		N/A - included in discussion in 4.5.2
28	Accounts related to affiliate revenue and affiliate expense are shown in the footnote of Appendix 2-H		N/A
28	Balances recorded in Account 4375 and Account 4380 must reconcile to the balances recorded in Appendix 2-N – Shared Services and Corporate Allocation for the three historic years, the bridge year and the test year. Any differences must be reconciled		N/A - balances in 2-N included in OM&A, discussed in 4.5.2
29	Identification of any discrete customer groups that may be materially impacted by changes to other rates and charges.		N/A
<b>EXHIBIT 4 - OPERATING COSTS</b>			
<i>Overview</i>			
29 & 30	Brief explanation of test year OM&A levels, cost drivers, significant changes, trends in costs including OM&A per customer (and its components) for the historical, bridge and test years, inflation rate assumed, business environment changes		4.1, 4.1.2, 4.1.3, 4.1.5, 4.2.3, 4.2.5, 4.2.5.1, 4.2.5.2, 4.4
<i>Summary and Cost Driver Tables</i>			
30	Summary of recoverable OM&A expenses; Appendix 2-JA		Chapter 2 Appendices Excel workbook
30	Recoverable OM&A cost drivers; Appendix 2-JB		4.2.6, Chapter 2 Appendices
30	OM&A programs table; Appendix 2-JC		4.2.7, Chapter 2 Appendices
30	Recoverable OM&A Cost per customer and per FTE; Appendix 2-L		4.2.3, Chapter 2 Appendices
30	Identification of change in OM&A in test year in relation to change in capitalized overhead.		4.1.6 (n/a)
30	OM&A variance analysis for test year with respect to bridge and historical years; Appendix 2-D		Chapter 2 Appendices Excel workbook
<i>Program Delivery Costs with Variance Analysis</i>			
30	Completed Appendix 2-JC OM&A Programs Table - completed by program; include variance analysis between test year costs against each of the last OEB approved costs and most recent actuals for variances that are outliers based on historical trend. The variance analysis should explain whether the change was within or outside the applicant's control		4.3
30 & 31	For each significant change within the applicant's control describe business decision that was made to manage the cost increase/decrease and the alternatives		4.3, 4.4
<i>Workforce Planning and Employee Compensation</i>			
31	Employee Compensation - completed Appendix 2-K		Table 4-32, Chapter 2 Appendices Excel workbook
31	Description of previous and proposed workforce plans, including compensation strategy		4.5.1.1, 4.5.1.2
31	Discussion of the outcomes of previous plans and how those outcomes have impacted their proposed plans including an explanation of the reasons for all material changes to headcount and compensation. Explanation for all years includes: - year over year variances, inflation rates used for forecasts, and the plan for any new employees - basis for performance pay, eligible employee groups, goals, measures, and review process for pay-for-performance plans, - relevant studies (e.g. compensation benchmarking)		4.5.1.1, 4.5.1.2, 4.5.1.5
31	For virtual utilities - Appendix K completed in relation to the employees of the affiliates who are doing the work of the regulated utility. The status of pension funding and all assumptions used in the analysis must be provided.  Three or fewer employees - the applicant must aggregate this category with the category to which it is most closely related. This higher level of aggregation must be continued, if required, to ensure that no category contains three or fewer employees.		n/a
32	Details of employee benefit programs including pensions, other post-employment retirement benefits (OPEBs), and other costs charged to OM&A. A breakdown of the pension and OPEBs amounts included in OM&A and capital must be provided for the last OEB-approved rebasing application, and for historical, bridge and test years		4.5.1.3, 4.5.1.6
32	Most recent actuarial report		Exhibit 4 Appendix 4-4
32	Accounting method for pension and OPEBs; if cash method, sufficient supporting rationale. If proposing to change the basis in which pension and OPEB costs included in OM&A, quantification of impact of transition		n/a
<i>Shared Services and Corporate Cost Allocation</i>			
32	Identification of all shared services among affiliates and parent company; identification of the extent to which the applicant is a "virtual utility"		4.5.2
32	Allocation methodology for corporate and shared services, pricing methodology, list of costs and allocators, including any third party review		4.5.2
33	Completed Appendix 2-N for service provided or received for historical, bridge and test; including reconciliation with revenue included in Other Revenue		4.5.2, Table 4-38, Chapter 2 Appendices Excel workbook
33	Shared Service and Corporate Cost Variance analysis - test year vs last OEB approved and test year vs most recent actual		4.5.2
33	Identification of any Board of Director costs for affiliates included in LDC costs		n/a
<i>Non-Affiliate Services, One-Time Costs, Regulatory Costs</i>			
33	Purchased Non-Affiliated Services - file a copy of procurement policy (signing authority, tendering process, non-affiliate service purchase compliance)		4.5.3, Exhibit 4 Appendix 4-5
33	For material transactions that are not in compliance with procurement policy, or that were undertaken pursuant to exceptions contemplated within the policy, an explanation as to why as well as a summary of the nature and cost of the product, and a description of the specific methodology used for selecting the vendor		n/a
33 & 34	Identification of one-time costs in historical, bridge, test; explanation of cost recovery in test (or future years). If no recovery of one-time costs is being proposed in the test year and subsequent IRM term, an explanation must be provided		4.5.4, Chapter 2 Appendices Excel workbook



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34	Regulatory costs - breakdown of actual and anticipated regulatory costs, including OEB cost assessments and expenses related to the CoS application (e.g. legal fees, consultant fees), proposed recovery (i.e. amortized?) Completed Appendix 2-M	4.5.4, 4.5.5, Chapter 2 Appendices Excel workbook
34	Information supporting the incremental level of the costs associated with the preparation and review of the current application. In addition, the applicant must identify over what period the costs are proposed to be recovered. For distributors, the recovery period would normally be the duration of the expected cost of service plus IRM term under the Price Cap IR option (i.e. five years). If the applicant is proposing a different recovery period, it must explain why it believes this is appropriate.	4.5.4

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<i>LEAP, Charitable and Political Donations</i>	
<b>34</b>	LEAP - the greater of 0.12% of forecasted service revenue requirement or \$2,000 should be included in OM&A and recovered from all rate classes
<b>34</b>	Detailed information for all contributions that are claimed for recovery
<b>34</b>	Charitable Donations - the applicant must confirm that no political contributions have been included for recovery
<i>Depreciation, Amortization and Depletion</i>	
<b>35</b>	Explanations for any useful lives of an asset that are proposed that are not within the ranges contained in the Kinectrics Report
<b>35</b>	Depreciation, Amortization and Depletion details by asset group for historical, bridge and test years. Include asset amount and rate of depreciation/amortization. Must complete Appendix 2-C which must agree to accumulated depreciation in Appendix 2-BA under rate base
<b>35</b>	Identification of any Asset Retirement Obligations and associated depreciation, accretion expense
<b>35</b>	Identification of historical depreciation practice and proposal for test year. Variances from half year rule must be documented and supporting rationale provided
<b>35</b>	Copy of depreciation/amortization policy, or equivalent written description; summary of changes to depreciation/amortization policy since last CoS
<b>35</b>	Explanation of any deviations from the practice of depreciating significant parts or components of PP&E separately
<b>36</b>	For any depreciation expense policy or asset service lives changes since its last rebasing application: - identification of the changes and detailed explanation for the causes of the changes - use of Kinectrics study or another study to justify changes in useful life - list detailing all asset service lives tied to USoA, detail differences in TUL from Kinectrics and explain differences outside of minimum and maximum TUL range from Kinectrics; Appendix 2-BB if there have been changes in asset service lives since last rebasing
<i>Income Tax or PILs</i>	
<b>36</b>	Completed version of the PILs model (PDF and Excel); derivation of adjustments for historical, bridge, test years
<b>36</b>	Supporting schedules and calculations identifying reconciling items
<b>36</b>	Most recent federal and provincial tax returns
<b>36</b>	Financial Statements included with tax returns if different from those filed with application
<b>37</b>	Calculation of Tax Credits; redact where required (filing of unredacted versions is not required)
<b>37</b>	Supporting schedules, calculations and explanations for other additions and deductions
<b>37</b>	Completion of the integrity checks in the PILs Model
<b>37 &amp; 38</b>	Accelerated CCA - Distributors must provide: the full revenue requirement impact recorded in Account 1592 and the balance sought for review and disposition, the method used in calculating the revenue requirement impact recorded in Account 1592, detailed calculations by year for the full revenue requirement impact recorded in Account 1592
<i>Other Taxes</i>	
<b>38</b>	Taxes other than income taxes or PILs, as defined in the APH (e.g. property taxes), should only be included in Account 6105, effective January 1, 2012. Account 6105 is not an OM&A account and should therefore be excluded from all OM&A totals. The applicant should provide an explanation of how these tax amounts are derived.

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<b>Non-recoverable and Disallowed Expenses</b>			
38	Exclude from regulatory tax calculation any non-recoverable or disallowed expenses	4.1.1	
<b>Conservation and Demand Management</b>			
39	Statement confirming that costs directly attributable to CDM programs (e.g. staff labour dedicated to such programs) are not included in the revenue requirement to be recovered through distribution rates	4.1.1	
<b>Lost Revenue Adjustment Mechanism Variance Account</b>			
39 - 44	<p>Distributors must provide version 6 of LRAMVA Work Form (Excel) when making LRAMVA requests for remaining amounts related to CFF activity. An application for lost revenues should include: Final Verified Annual Reports if claiming lost revenues from savings from CDM programs delivered in 2017 or earlier, Participation and Cost reports in Excel format made available by the IESO.</p> <p>- Personal information and commercially sensitive information removed.</p> <p>An application for lost revenues should also provide:</p> <ul style="list-style-type: none"> <li>- statement identifying the year(s) of new lost revenues and prior year savings persistence claimed in the LRAMVA disposition</li> <li>- statement confirming LRAMVA based on verified savings results supported by the distributors final CDM Report and Persistence Savings Report (both filed in Excel format).</li> <li>- statement indicating that the distributor has relied on the most recent input assumptions available at the time of program evaluation</li> <li>- summary table with principal and carrying charges by rate class and resulting rate riders</li> <li>- statement providing the disposition period; rationale provided for disposing the balance in the LRAMVA if one or more classes do not generate significant rate riders</li> <li>- details for the forecasted CDM savings included in the LRAMVA calculation including reference to the OEBs approval, or an explanation if there are no forecast CDM savings</li> <li>- rationale confirming how rate class allocations for actual CDM savings were determined by class and program (Tab 3-A of LRAMVA Work Form)</li> <li>- statement confirming whether additional documentation was provided in support of projects that were not included in distributors final CDM Annual Report (Tab 8 of LRAMVA Work Form as applicable)</li> <li>- for a distributor's street lighting project(s) which may have been completed in collaboration with local municipalities, the following must be provided: Explanation of the methodology to calculate street lighting savings; Confirmation whether the street lighting savings were calculated in accordance with OEB-approved load profiles for street lighting projects; Confirmation whether the street lighting project(s) received funding from the IESO and the appropriate net-to-gross assumption used to calculate street lighting savings</li> </ul> <p>For the recovery of lost revenues related to demand savings from street light upgrades, distributors should provide the following information:</p> <ul style="list-style-type: none"> <li>o Explanation of the forecast demand savings from street lights, including assumptions built into the load forecast from the last CoS application</li> <li>o Confirmation that the street light upgrades represent incremental savings attributable to participation in the IESO program, and that any savings not attributable to the IESO program have been removed (for example, other upgrades under normal asset management plans)</li> <li>o Confirmation that the associated energy savings from the applicable IESO program have been removed from the LRAMVA workform so as not to double count savings (for example, if requesting lost revenue recovery for the demand savings from a street light upgrade program, the associated energy savings from the Retrofit program have been subtracted from the Retrofit total)</li> <li>o Confirmation that the distributor has received reports from the participating municipality that validate the number and type of bulbs replaced or retrofitted through the IESO program</li> </ul> <p>o A table, in live excel format, that shows the monthly breakdown of billed demand over the period of the street light upgrade project, and the detailed calculations of the change in billed demand due to the street light upgrade project (including data on number of bulbs, type of bulb replaced or retrofitted, average demand per bulb).</p> <p>For the recovery of lost revenues related to demand savings from other programs that are not included in the monthly Participation and Cost Reports of the IESO (for example Combined Heat and Power projects), distributors should provide the following information: The third party evaluation report that describes the methodology to calculate the demand savings achieved for the program year. In particular, if the proposed methodology is different than the evaluation approaches used by the IESO, an explanation must be provided explaining why the proposed approach is more appropriate, the rationale for net-to-gross assumptions used, a breakdown of billed demand and detailed level calculations in live excel format</p> <p>Participation and Cost Reports and detailed project level savings files made available by the IESO to support the clearance of energy- and/or demand-related LRAMVA balances where final verified results from the IESO are not available. These reports should be filed in excel format, similar to the previous Final Verified Annual Reports from 2015 to 2017.</p> <ul style="list-style-type: none"> <li>o If a distributor seeks to claim any additional program savings to December 31, 2020: <ul style="list-style-type: none"> <li>- Related to CCF programs: an explanation must be provided as to how savings have been estimated based on the available data (i.e. IESO's Participation &amp; Cost Reports) and/or rationale to justify the eligibility of the program savings</li> <li>- Related to other programs delivered by a distributor: an explanation and rationale should be provided to justify the eligibility of the additional program savings</li> </ul> </li> </ul>	4.8	
<b>EXHIBIT 5 - COST OF CAPITAL AND CAPITAL STRUCTURE</b>			
<b>Capital Structure</b>			
44	Statement that LDC adopts OEB's guidelines for cost of capital and confirms that updates will be done. Alternatively - utility specific cost of capital with supporting evidence	Exhibit 5 page 4 (starting line 13)	
44	Completed Appendix 2-OA for last OEB approved and test year	Chapter 2 Appendices Excel workbook	
44	Completed Appendix 2-OB for historical, bridge and test years	Chapter 2 Appendices Excel workbook	
44	Explanation for any changes in capital structure	N/A Exhibit 5 page 3 line 16	
<b>Cost of Capital (Return on Equity and Cost of Debt)</b>			
44	Calculation of cost for each capital component	Table 5-1	
45	Profit or loss on redemption of debt	N/A Exhibit 5 page 3 line 13	
45	Copies of promissory notes or other debt arrangements with affiliates	N/A	
45	Explanation of debt rate for each existing debt instrument including an explanation on how the debt rate was determined and is in compliance with the policies documented in the 2009 Report	Table 5-2	
45	Forecast of new debt in bridge and test year - details including estimate of rate	Exhibit 5, page 6	
45	If proposing any rate that is different from the OEB guidelines, a justification of the proposed rate(s), including key assumptions	N/A	
45	Notional Debt - should attract the weighted average cost of actual long-term debt rather than the current deemed long-term debt rate issued by the OEB	Table 5-2	
<b>Not-for-Profit Corporations</b>			
46	The requested capital structure and cost of capital (including the proposed cost of long-term and short-term debt and proposed return on equity)	N/A	

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46	Statement as to whether the revenues derived from the return on equity component of the cost of capital is to be used to build up operating and capital reserves or will be used for other purposes	N/A
46	If the revenues derived from the return on equity component of the cost of capital will be used to fund reserves, provide the specifications for each proposed reserve fund and a description of the governance (policies, procedures, sign-off authority, etc.) that will be applied	N/A
46	If the revenues derived from the return on equity component of the cost of capital will be used for other purposes, provide a statement as to whether these revenues will be used for non-distribution activities (in the situation where the excess revenues are greater than the amounts needed to fund distribution activities). Provide rationale supporting the use of the revenues in this manner. Also provide the governance (policies, procedures, sign-off authority, etc.) that will be applied to the funding of non-distribution activities	N/A
46	If there are approved reserves from previous OEB decisions provide the following: -the limits of any capital and/or operating reserves as approved by the OEB, and identifying the decisions establishing these reserve accounts and their limits -the current balances of any established capital and/or operating reserves	N/A
<b>EXHIBIT 6 - REVENUE DEFICIENCY/SUFFICIENCY</b>		
47	Revenue deficiency or sufficiency calculations net of electricity price differentials captured in the Retail Settlement Variance Accounts (RSVAs) and also net of any cost associated with low voltage (LV) charges or DVA balances of distribution expenditures/revenues being tracked through approved deferral and variance accounts for certain distribution assets (e.g. ICM and ACM capital projects, MIST meters) and for which disposition is not being sought in the application.	
47	Summary of drivers for test year deficiency/sufficiency, how much each driver contributes; references in application evidence mapped to drivers	

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47	Impacts of any changes in methodologies to deficiency/sufficiency	
<i>Revenue Requirement Work Form</i>		
48	RRWF - in PDF and Excel. Revenue requirement, def/sufficiency, data entered in RRWF must correspond with other exhibits	RRWF
48	If the enhanced RRWF cannot reflect a distributor's proposed rates accurately, the distributor must file its rate generator model	
<b>EXHIBIT 7 - COST ALLOCATION</b>		
<i>Cost Allocation Study Requirements</i>		
48	Completed cost allocation study using the OEB-approved methodology or a comparable model must be filed reflecting future loads and costs and be supported by appropriate explanations and live Excel spreadsheets. Sheets 11 and 12 of the RRWF must also be completed. Updated load profiles or scaled version of HONI CAIF. Model must be consistent with test year load forecast, changes to customer classes and load profiles.	London Hydro EB-2021-0041 2022_Cost_Allocation_Model, RRWF
48 & 49	Explanation provided if a distributor is unable to update its load profiles and confirm that it intends to put plans in place to update its load profiles the next time a cost allocation model is filed	N/A
49	Provide spreadsheet and a description with example calculations to show how the demand data in the cost allocation model was derived from the load forecast and load profiles	7.1.3 Weighting Factors
49	Description of weighting factors, and rationale for use of default values (if applicable)	
49	Complete live Excel cost allocation model, whether using the OEB-issued one or a different model. If using the OEB-issued model, Input sheet I.2, cells c15 and c17 must be used to identify the final run of the model on each sheet. If using another model, the distributor must file equivalent information.	London Hydro EB-2021-0041 2022_Cost_Allocation_Model
50	Host Distributor only - evidence of consultation with embedded Dx - statement regarding embedded Dx support for approach to allocation of costs - if embedded Dx is separate class - class in cost allocation study and RRWF, Sheet 11 - if new embedded Dx class - rationale and supporting evidence (cost of serving, load served, asset ownership information, distribution charges); include in cost allocation study and RRWF, Sheet 11 - if embedded Dx billed as GS customer - , include with the GS class in cost allocation model and Appendix 2-P. Provide cost of serving, load served, asset ownership information, distribution charges, appropriateness of rate class. File Appendix 2-Q.	N/A
51	Unmetered Loads (including Street Lighting) - Confirmation of communication with unmetered load customers when proposing changes to the level of the rates and charges or the introduction of new rates and charges	7.5 Confirmation of Communication - Unmetered Load
51	microFIT - if the applicant believes that it has unique circumstances which would justify a certain rate, appropriate documentation must be provided	N/A
51	Standby Rates - distributors should request approval for its standby rates to be made final and provide evidence confirming that they have advised all affected customers of the proposal. A distributor that seeks changes to its standby charges, including a change in the methodology on which these rates are based, must provide full documentation supporting its proposal, and confirm that all affected customers have been notified of the proposed change(s).	N/A
51 & 52	New customer class or eliminated customer class - rationale and restatement of revenue requirement from previous CoS	N/A
<i>Class Revenue Requirements</i>		

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52	To support a proposal to rebalance rates, the distributor must provide information on the revenue by class that would apply if all rates were changed by a uniform percentage. Ratios must be compared with the ratios that will result from the rates being proposed by the distributor.		7.2.1 Revenue at Existing Rates
<b>Revenue to Cost Ratios</b>			
53	If R:C ratios outside deadband based on model - distributors must include cost allocation proposal to bring them within the OEB-approved ranges. In making any such adjustments, distributors should address potential mitigation measures if the impact of the adjustments on the rates of any particular class or classes is significant.		7.3.1 Revenue Re-balancing
53	If distributor proposes to continue rebalancing rates after the cost of service test year, the ratios proposed for subsequent year(s) must be provided		7.3.1 Revenue Re-balancing
53	If Cost Allocation Model other than OEB model used - exclude LV, exclude DVA such as smart meters		N/A
<b>EXHIBIT 8 - RATE DESIGN</b>			
54	Monthly fixed charges - 2 decimal places; variable charges - 4 decimal places		RRWF
<b>Fixed Variable Proportion</b>			
54	The following is to be provided in relation to the fixed/variable proportion of proposed rates: -Current F/V with supporting info -Proposed F/V proportion with explanation for any changes (billing determinants from proposed load forecast) -Table comparing current and proposed monthly fixed charges with the floor and ceiling as in cost allocation study Analysis must be net of rate adders, funding adders, and rate riders		8.1 FIXED/VARIABLE PROPORTION
<b>Rate Design Policy</b>			
55	Applicants that are still transitioning to fully fixed residential rates should refer to the approach to implementation of the policy, including mitigation expectations, was described in a letter from the OEB published on July 16, 2015		N/A
55	Fully fixed rate design for new charges applicable to the residential class provided that those charges are specifically related to the distribution of electricity. Pass-through costs (e.g. transmission rates, Low Voltage charges, and Group 1 deferral and variance accounts) and LRAMVA amounts are to continue to be recovered as variable charges because the distributor's costs vary with electricity usage. Previously approved distribution-specific charges or rate riders on a distributor's tariff should remain unchanged until they expire, even if they were declared interim.		RRWF
<b>RTSRs</b>			
55	Retail Transmission Service Rate Work Form - PDF and Excel		London Hydro EB-2021-0041 2022 RTSR Workform
55	RTSR information must be consistent with working capital allowance calculation; explanation for any differences		London Hydro EB-2021-0041 2022 RTSR Workform
<b>Retail Service Charges</b>			
55	If proposing changes to Retail Service Charges or introduction of new rates and charges - evidence of consultation and notice, and results of consultation		N/A
56	Distributors that are still using the Retail Service Costs Variance Accounts (RCVAs) will dispose of the balances and the RCVAs will be eliminated. Distributors should forecast retail services revenues based on the updated charges and include the costs of providing retail services in revenue requirement		Section 9.4
<b>Regulatory Charges</b>			
56	If applying for a rate other than the generic rate set by the OEB, distributors must provide justification as to why their specific circumstances would warrant a different rate, in addition to a detailed derivation of their proposed rate		N/A
<b>Specific Service Charges</b>			
56	Specific Service Charge description/purpose/reason for new and revised SSC; calculations to support charges		8.7 Specific Service Charges
56 & 57	Identification in the Application Summary all proposed changes that will have a material impact on customers, including charges that may affect a discrete group		N/A
57	Identification of any rates and charges in Conditions of Service that do not appear on tariff sheet. Explain nature of costs, provide schedule outlining revenues or capital contributions recovered from these rates from last OEB-approved year to 2020 and the revenue forecasted for the bridge and test years. A proposal and explanation as to whether these charges should be included on tariff sheet		N/A
57	Ensure revenue from SSCs corresponds with Operating Revenue evidence		Caroline
<b>Wireline Pole Attachment Charge</b>			
58	Record the excess incremental revenue as of September 1, 2018 until the effective date of its rebased rates in a new variance account related to pole attachment charge. Distributors will need to refund the closing balance in the distributor's next cost of service application. Distributors may forecast a balance up to the effective date of its new rates, provided it can do so with reasonable accuracy, and the OEB may consider disposing of the forecasted amount and closing the account.		Section 9.4
57 & 58	OEB issued an Order which determined that the inflationary adjustment for 2021 would be suspended. The Order stated that the province-wide pole attachment charge of \$44.50 will remain in effect as of January 1, 2021 on an interim basis, until further notice. The Order does not affect any distributor that has an approved distributor-specific wireline pole attachment charge.		8.7 Specific Service Charges
<b>Low Voltage Service Rates</b>			
58	If the distributor is fully or partially embedded, information on the following must be provided: Forecast LV Cost		8.8 LOW VOLTAGE SERVICE RATES
			N/A

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58	Actual LV Cost (historical, bridge, test), variances and explanations for substantive changes		N/A
58	Support for forecast LV, e.g. Hydro One Sub-Transmission charges		N/A
58	Allocation of forecasted LV cost to customer classes (typically proportional to Tx connection revenue)		N/A
58	Proposed LV rates by customer class		N/A
<b>Smart Meter Entity Charge</b>			
58	Distributor must follow accounting guidance provided on March 23, 2018		8.6 SMART METERING ENTITY CHARGE
<b>Loss Factors</b>			
59	Proposed SFLF and Total Loss Factor for test year		
59	Statement as to whether LDC is embedded including whether fully or partially		8.9 LOSS ADJUSTMENT FACTORS
59	Study of losses if required by previous decision		8.9 LOSS ADJUSTMENT FACTORS
59	3-5 years of historical loss factor data - Completed Appendix 2-R		Chapter 2 Appendices Excel workbook
59	If proposed loss factor >5%, explanation and action plan to reduce losses going forward		8.9 LOSS ADJUSTMENT FACTORS
59	Explanation of SFLF if not standard		8.9 LOSS ADJUSTMENT FACTORS
<b>Tariff of Rates and Charges</b>			
59	Current and proposed Tariff of Rates and Charges filed in the Tariff Schedule/Bill Impacts Model - <b>must be filed in Excel format</b> Explanation and support of each change in the appropriate section of the application		London Hydro EB-2021-0041 2022_Tariff_Schedule_and_Bill_Impact_Model
59	Explanation of changes to terms and conditions of service if changes affect application of rates		8.3 Retail Transmission Service Rates (RTSR)
59	Proposed tariffs must include applicable regulatory charges, and any other generic rates as ordered by the OEB		8.5 REGULATORY CHARGES
<b>Revenue Reconciliation</b>			
60	Calculations of revenue per class under current and proposed rates; reconciliation of rate class revenue and other revenue to total revenue requirement (i.e. breakout volumes, rates and revenues by rate component etc.)		8.12 Revenue Reconciliation
60	Completed RRWF - Sheet 13 - rates and charges entered on this sheet should be rounded to the same decimal places as tariff		RRWF
<b>Bill Impact Information</b>			
60	Completed Tariff Schedule and Bill Impacts Model. Bill impacts must identify existing rates, proposed changes to rates, and detailed bill impacts (including % change in distribution excluding pass through costs - Sub-Total A, % change in distribution - Sub-Total B, % change in delivery - Sub-Total C, and \$ change in total bill)		RRWF
60	Impact of changes resulting from the as-filed application on representative samples of end-users (i.e. volume, % rate change and revenue). Commodity and regulatory charges held constant		RRWF
60	Rates and charges input in the tariff schedule and Bill Impacts Model rounded to the decimal places as shown on the existing tariff		RRWF
60	Bill impacts provided for typical customers and consumption levels. Must provide residential 750 kWh, residential at the lowest 10th percentile and GS<50 2,000 kWh. Bill impacts must be provided for a range of consumption levels relevant to the service territory.		RRWF
61	If applicable, for certain classes where one or more customers have unique consumption and demand patterns, the distributor must show a typical impact and provide an explanation		N/A
<b>Rate Mitigation</b>			
61	For distributors still in the process of moving to fully fixed residential rates - refer to the approach to implementation of the policy, including mitigation expectations described in a letter from the OEB published on July 16, 2015. Distributors should also refer to the OEB's previous decision approving the extended implementation of fully fixed residential rates.		8.14 Rate Mitigation
61	Mitigation plan if total bill increase for any customer class is >10% including: specification of class and magnitude of increase, description of mitigation measures, justification, revised impact calculation. The Tariff Schedule and Bill Impacts Model must reflect any mitigation plan proposed.		8.14 Rate Mitigation
61 & 62	Rate Harmonization Plans, if applicable - including impact analysis		N/A
<b>EXHIBIT 9 - DEFERRAL AND VARIANCE ACCOUNTS</b>			
62	List of all outstanding DVA and sub-accounts; provide description of DVAs that were used differently than as described in the APH		Section 9.2 - Table 9-2, Table 9-3
62	Completed DVA continuity schedule for period following last disposition to present - live Excel format. Continuity schedule must show separate itemization of opening balances, annual adjustments, transactions, dispositions, interest and closing balances for all outstanding deferral and variance accounts. The opening principal amounts as well as the opening interest amounts for Group 1 and 2 balances, shown in the DVA Continuity Schedule, must reconcile with the last applicable approved closing balances.		2022 DVA Continuity Schedule
62	Confirm use of interest rates established by the OEB by month or by quarter for each year		Section 9.1 - Table 9-1
62	Explanation if account balances in continuity schedule differs from trial balance in RRR and AFS. This includes all Account 1508 sub-accounts. A reconciliation of all the Account 1508 sub-accounts to the Account 1508 control account reported in the RRR is to be provided in the continuity schedule		Section 9.2
63	Identification of Group 2 accounts that will continue/discontinue going forward, with explanation		Section 9.4
63	Statement as to any new accounts, and justification.		Section 9.9

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		Date:
Filing Requirement Page # Reference		Evidence Reference, Notes (Note: if requirement is not applicable, please provide reasons)
63	Statement whether any adjustments made to DVA balances previously approved by OEB on final basis - the OEB expects that no adjustment will be made to any deferral and variance account balances previously approved by the OEB on a final basis. Distributors to refer to OEB letter of October 2019 in addressing accounting or other errors in respect of Group 1 deferral and variance accounts that have previously been disposed of by the OEB on a final basis. Applicants must provide explanations for the nature and the amounts of adjustments, and include appropriate supporting documentation, under a section titled "Adjustments to Deferral and Variance Accounts".	Section 9.1
63	Breakdown of energy sales and cost of power by USoA - as reported in AFS mapped and reconciled to USoA. Provide explanation if there are differences between the reported energy sales and cost of power expense	Section 9.10
63	Completed GA Analysis Workform for each year that has not previously been approved by the OEB for disposition irrespective of whether seeking disposition of the Account 1589 balance as part of current application. If the distributor is adjusting the Account 1589 balance that was previously approved on an interim basis, the GA Analysis Workform is required to be completed from the year after the distributor last received final disposition for Account 1589.	2022 GA Analysis Workform
64	Statement confirming distributor has complied with OEB guidance of February 21, 2019 on the accounting for Accounts 1588 and 1589	Section 3 - Commodity Accounts 1588 and 1589
<i>Disposition of Deferral and Variance Accounts</i>		
64	Identify all accounts for which LDC is seeking disposition; identify DVA for which LDC is not proposing disposition and the reasons why	Sections 9.5 and 9.6
65	Statement whether DVA balances before forecasted interest match the last AFS; explain any variances	
64	If the RRR balances do not agree to the year-end balances in the continuity schedule, a distributor must reconcile and explain the difference(s).	Section 9.2
64	For any utility specific accounts requested for disposition (e.g. Account 1508 sub-accounts), supporting evidence showing how the annual balance is derived must be provided. The relevant accounting order must also be provided	Section 9.4
64	Request final disposition of residual balances for vintage Account 1595 sub-accounts only once. Distributors are expected to seek disposition of the audited account balance in the fourth rate year after the expiry of the rate rider. A completed 1595 Analysis Workform for residual balances that meet the eligibility requirements for dispositions of Account 1595 Sub-accounts must be filed	Section 9.3, 1595 Analysis Workform
64	Proposed mechanisms for disposition with all relevant calculations: - allocation of each account (including rationale) - proposed billing determinants, including charge type for recovery purposes - in accordance with section 2.8.2, and include in cont. schedule	Section 9.7
64	Propose rate riders for recovery or refund of balances that are proposed for disposition. The default disposition period is one year; if the applicant is proposing an alternative recovery period must provide explanation	Section 9.8
65	Rate riders where volumetric rider is \$0.0000 for one or more classes not included in the tariff for those classes	Section 9.7 Proposed method of disposition for Rate Rider for RSVA WMS - Sub-account CBR Class B
65	Establish separate rate riders to recover balances in the RSVA's from Market Participants who must not be allocated the RSVA balances related to charges for which the MP's settle directly with the IESO	Section 9.8 Proposed Rate Rider for DVA Balances Non-WMP; DVA Continuity Schedule - Tab 7
65	Propose disposition of Account 1592 – PILs and Tax Variances, Sub-account CCA Changes (see 2.4.5.1 of filing requirements)	Section 9.4
<i>Global Adjustment</i>		
66	Establishment of a separate rate rider included in the delivery component of the bill that would apply prospectively to Non-RPP Class B customers when clearing balances from the GA Variance Account	Section 9.8, DVA Continuity Schedule - Tab 7
66	GA Analysis Workform in live Excel format for each year that has not previously been approved by the OEB for disposition (on an interim or final basis), irrespective of whether or not seeking disposition of Group 1 deferral and variance account balances. If the distributor is adjusting the Account 1589 GA balance that was previously approved on an interim basis, the GA Analysis Workform is required to be completed from the year after the distributor last received final disposition for Account 1589	GA Analysis Workform completed
66	As part of Note 5 in the GA Analysis Workform, reconciliation of any discrepancy between the actual and expected balance by quantifying differences pertaining to factors such as true-ups between estimated and actual costs and/or revenues. Any remaining, unexplained discrepancy will be assessed for materiality and could prompt further analysis before disposition of the balance is approved. Any unexplained discrepancy that is greater than +/- 1% of the total annual IESO GA charges will be considered material and warrant further investigation.	GA Analysis Workform, Tab GA 2020
66	To further support a conclusion that GA charges have been appropriately allocated between customer classes, distributors must also perform a reasonability test for the balance in Account 1588. The reasonability test is included in the GA Analysis Workform.	GA Analysis Workform, Tab Account 1588
<i>Commodity Accounts 1588 and 1589</i>		
67	If a distributor has not implemented OEB's February 21, 2019 accounting guidance, it must indicate this	N/A, The Commodity Accounting Guidance was fully implemented
67	Indication of the year in which Account 1588 and Account 1589 balances were last approved for disposition, and whether the balances were approved on an interim or final basis. If the balances were last disposed on an interim basis, distributors should indicate the year in which balances were last disposed on a final basis.	N/A, The Commodity Accounting Guidance was fully implemented
67	In order to request for final disposition of historical balances as part of the current application, distributors must provide confirmation that these balances have been considered in the context of the accounting guidance and provide a summary of the review performed. Distributors must also discuss the results of the review, whether any systemic issues were noted, and whether any material adjustments to those balances have been recorded. A summary and description of each adjustment made to the historical balances must also be provided in the application.	N/A, The Commodity Accounting Guidance was fully implemented
67 & 68	Expectations of final disposition requests of commodity pass-through account balances are: - Interim disposition of historical balances or no disposition requested: some distributors may have received approval for interim disposition of historical account balances or did not request disposition of account balances in a prior rate application due to the threshold test. If these distributors have reviewed the balances in the context of the new accounting guidance and are confident that there are no systemic issues with their RPP settlement and related accounting processes, distributors may request final disposition of account balances. If these distributors identified errors or discrepancies that materially affect the ending account balances, utilities should adjust their account balances prior to requesting final disposition - No disposition of historical balances and concerns noted: distributors that did not receive approval for disposition of historical account balances due to concerns noted by the OEB should apply the accounting guidance to those balances and adjust the balances as necessary, prior to requesting final disposition.	N/A, The Commodity Accounting Guidance was fully implemented



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68	If accounting guidance not fully implemented effective January 1, 2019, a distributor must provide an explanation as to why this guidance has not been implemented, the status of the implementation process, and the expected implementation date.		The Commodity Accounting Guidance was fully implemented
68	Certification by the CEO, CFO or equivalent that distributor has robust processes and internal controls in place for the preparation, review, verification and oversight of account balances being proposed for disposition		Appendix 9-1
<i>Disposition of CBR Class B Variance</i>			
68 & 69	Proposed disposition of Account 1580 sub-account CBR Class B in accordance with the CBR Accounting Guidance. Must be disposed over one year. - In the DVA continuity schedule, applicants must indicate whether they serve any Class A customers during the period where Account 1580 CBR Class B sub-account balance accumulated. In the event that the allocated CBR Class B amount results in a volumetric rate rider that rounds to zero at the fourth decimal place in one or more rate classes, the entire balance in Account 1580 CBR Class B sub-account will be added to the Account 1580 – WMS control account to be disposed through the general purpose Group 1 DVA rate riders - Account 1580 sub-account CBR Class A is not to be disposed through rates proceedings but rather follow the OEB's accounting guidance - The DVA continuity schedule will allocate the portion of Account 1580 sub-account CBR Class B allocated to customers who transitioned between Class A and Class B based on consumption levels		Section 9.7 Proposed method of disposition for Rate Rider for RSVA WMS - Sub-account CBR Class B; Section 9.8; DVA Continuity Schedule - Tab 7
<i>Disposition of Account 1595</i>			
69	Applicants are expected to request disposition of residual balances in Account 1595 Sub-accounts for each vintage year only once, on a final basis		Section 9.3
70	Account 1595 Analysis Workform - live Excel - for distributors who meet the eligibility requirements for disposition of residual balances of Account 1595 sub-accounts		1595 Analysis Workform completed
70	Reconciliation of 1595 residual balance with any amounts that have yet to result in associated rate riders (for example, shared tax savings amounts that were previously approved to be transferred to Account 1595 for disposition at a later date).		N/A
70	Material residual balances will require further analysis, consisting of separating the components of the residual balances by each applicable rate rider and by customer rate class. Detailed explanations for any significant residual balances attributable to specific rate riders for each customer rate class. Explanations must include for example, volume differences between forecast volumes (used to calculate the rate riders) as compared to actual volumes at which the rate riders were billed.		N/A
<i>Retail Service Charges</i>			
70 & 71	Retail Service Charges - if there is a balance in 1518 or 1548, distributor must: - confirm variances are incremental costs of providing retail services; identify drivers for balances - provide schedule identifying all revenues and expenses listed by USoA that are incorporated into the variances - state whether Article 490 of APH has been followed; explanation if not followed		Section 9.4
71	The OEB established a new variance account for electricity distributors that no longer used the RCVAs. The balance in the account would be refunded to ratepayers in a future rate application, and the new account subsequently closed. Distributors can forecast a balance up to the effective date of new rates and the OEB may consider disposing of the forecasted amount		N/A
<i>Establishment of New Deferral and Variance Accounts</i>			
71	New DVA - information provided which addresses that the requested DVA meets the following criteria: causation, materiality, prudence; include draft accounting order.		Section 9.9