



**Grimsby Power Incorporated**

231 Roberts Road

Grimsby, ON

L3M 5N2

PH: 905.945.5437 x 221

FX: 905.945.9933

December 2, 2022

Delivered by RESS

Nancy Marconi, Registrar  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
PO Box 2319  
Toronto, ON, M4P 1E4

Re: EB-2022-0035 Grimsby Power Incorporated Application for 2023 Rates

Dear Ms. Marconi:

With respect to the above noted application Grimsby Power has reviewed the models and the Draft Decision and Rate Order issued by the OEB November 28, 2022. As a result of that review Grimsby Power would like to respectfully request that the OEB consider an update to the Retail Transmission Service Rates embedded within Grimsby Power's rate order for 2023 rates.

Grimsby Power notes that a decision and rate order was issued by the OEB on November 28, 2022 for Hydro One Networks 2023 Sub Transmission Rates effective January 1, 2023 to December 31, 2023.

As per Chapter 3 filing requirements section 3.2.4 Electricity Distribution Retail Transmission Service Rates *"Once any January 1, 2023 UTR adjustments have been determined, OEB staff will adjust each distributor's 2023 RTSR section of the Rate Generator model to incorporate these changes, where applicable. The Rate Generator model will also reflect the most recent sub-transmission rates approved by the OEB. Likewise, OEB staff will update these rates as they become available, where applicable."*

Grimsby Power has updated the RTSR tab in the rate generator model to reflect Hydro One's Sub Transmission rates effective January 1, 2023. Grimsby Power respectfully requests that the draft rate order and tariff of rates and charges be updated to reflect Hydro One's sub-transmission rates effective January 1, 2023.

Grimsby Power acknowledges that, ultimately, the difference between the placeholder rates used in its current rate order and the actual rates will be captured in accounts 1584 and 1586 and recoverable by Grimsby Power. However, as the actual rates are known and Grimsby Power's new rates for 2023 have yet to be implemented, Grimsby Power believes it would be beneficial to:

- a) avoid the intentional accumulation of a balance recoverable from ratepayers, included related carrying costs, and
- b) avoid embedding a certain shortfall in Grimsby Power's cash flow by intentionally underrecovering revenue related to the known increase in Sub Transmission rates relative to the current placeholder in the Draft Rate Order,

by incorporating the updated Sub Transmission rates into Grimsby Power's Draft Rate Order now, rather than rely on the variance accounts.

In addition to our request that the OEB implement the updated 2023 Sub Transmission rates in the Draft Rate Order, Grimsby Power notes that the quoted rate impact on page 1 of the Draft Rate Order is incorrect.

The current monthly total bill increase for a residential customer consuming 750 kWh is \$4.40, not \$3.14. The \$3.14 increase (incorrectly) referenced on page 1 of the Draft Rate Order was for a residential customer consuming 321 kWh per month, not 750 kWh. Accordingly, if the OEB rejects Grimsby Power's proposal with respect to the updating of the Sub Transmission rates used in the setting of rates, the monthly impact noted on page 1 has to be corrected to \$4.40. If, however, the OEB proceeds with updating the model with Hydro One's sub-transmission rates effective January 1, 2023 as requested by Grimsby Power, then the total monthly bill increase prior to taxes and the Ontario Electricity Rebate for a residential consumer consuming 750 kWh per month should be updated to \$5.03, as calculated in the updated Model provided with this correspondence.

Should there be any questions with respect to Grimsby Power's request or proposed correction please feel free to contact the undersigned.

Sincerely,

Amy La Selva  
Regulatory and Customer Accounts Supervisor  
Grimsby Power Incorporated  
905-945-5437 ext. 258