

**ERTH Power Corporation  
EB-2022-0029**

**February 26, 2023**

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

**Staff Follow-up Question-1**

**Ref: Staff Follow-Up Question – 5 ; January 30, 2023**

Reference stated that “ERTH Power is requesting disposition for and would note that every effort has been made to ensure accuracy”, “ERTH Power with the help of the Utilismart RSVA manager and using the OEB 1598 Commodity model consistently is confident that processes are in place to ensure accurate filing and tracking of balances”, and “ERTH Power would request that the disposition of 1588 and 1589 accounts be approved on an Interim basis and will continue to apply lessons learned to the 2019 and 2020 data and will report if any changes are found and corrected.”

Questions:

- a) Given that ERTH Power appears to be confident with the accuracy of the balances in these two accounts, please explain why the interim disposition is requested for accounts 1588 and 1589 in this application.
- ***ERTH Power was simply noting that the OEB approves these balances on an interim basis in all cases and as such this is not final disposal. ERTH is confident in the accuracy of these balances, however in the unlikely event that errors are found the fact that they have been disposed of on an interim basis would provide the opportunity for corrections.***
- b) Please clarify what activity by ERTH Power would the “lessons” are to be learned to the 2019 and 2020 data.
- ***ERTH Power used the methodology from the OEB model to re-evaluate the RPP settlements for each month in 2019 and 2020. ERTH Power used the wholesale kWh's for both RPP and Non-RPP to determine the GA to transfer to GL account 4705 when in the past it was using the retail kWhs which would not take into consideration the difference in loss factor. ERTH Power ensured that any RPP settlements or GA adjustments that were filed as post final adjustments were included in the proper months when calculating the variances for 1588 and 1589.***

## Staff Follow-up Question-2

Ref: Staff Follow-Up Question – 2; February 13, 2023

Ref2: Goderich 2023 GA Analysis Workform

Reference 1 stated that “ERTH Power undertook the task of splitting the balances by rate zone despite having one IESO invoice and one billing system. ERTH Power is confident that this split between rate zones is accurate and notes that only IF discrepancies are found adjustments will be made in future rate proceedings.”

- a) Please elaborate further regarding ERTH Power’s process of splitting the balances by rate zones and how ERTH Power ensures that this split between rate zones is accurate.
- ***ERTH Power calculates the dollar amount to split on the IESO invoice by calculating the total kwhs that each rate zone withdraws from the grid which it can determine from the IESO AQEW/AQEI report as which is split out by delivery point. The rate zone for Goderich has its own metered delivery point with the IESO (and is not embedded within Hydro One) to enable accurate metering of the kwh’s withdrawn from the grid for that location. ERTH Power next calculates the kwh’s of generation that is injected in each rate zone which is a simple process as the Goderich rate zone only has 1 generation customer. ERTH Power also calculates the Class A kwh by rate zone. ERTH Power has set up the Utilismart RSVA Settlement Manager reporting by rate zone to help facilitate determining kwh’s consumed by all customers including Class A and Generation. ERTH Power then divides the total cost of power and GA charged on the IESO invoice monthly by rate zone. Each month ERTH Power determines the total KWH delivered by each rate zone as well as the Class B kwh by each rate zone.***
  - ***For revenue splits ERTH Power has assigned each customer in its CIS billing system (Northstar) to a rate zone of either Main or Goderich to be able to report all billings whether RPP (TOU or Tiered) , Class B or Class A by rate zone monthly.***
- b) Has ERTH Power found any discrepancies as of the present date? If so, please provide the details.
- ***ERTH Power has not found any discrepancies or changes that would affect the 1588 or 1589 balances.***

- c) Please explain why ERTH Power is confident that the rate zone split is accurate given the % unresolved differences in Tab GA 2019 and Tab GA 2020 of Reference 2 still exceed the 1% criterion.
- ***ERTH Power is confident that the rate zone split is accurate. The exceeding of the 1% criterion is due to timing differences between the two years as ERTH is unable to re-calculate unbilled revenue retroactively. ERTH Power did not want to arbitrarily adjust the balances between the two years and notes that when the two years are combined the unresolved difference is -0.8% which is an average of 0.4% per year well within the +/-1% and a total of -\$10,400 which is not a material variance.***

***Goderich GA Analysis Unresolved differences***

***2019 -2.9% -\$64,692***

***2020 2.1% \$54,286***

***2021 -0.2% -\$4,380***

- d) Please confirm whether ERTH Power is using the same rate zone split approach in 2021 balances.
- a. If confirmed, please explain why the % unresolved difference in Tab GA 2021 of Reference 2 is less than the 1% criterion.
- ***ERTH Power confirms it is using the same rate zone split approach in 2021 balances. The 2021 unresolved difference is -0.2% or -\$4,380.***
- b. If not confirmed, please explain why a different rate zone split approach is being used for different calendar years.