

**BY E-MAIL**

December 16, 2024

Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto ON M4P 1E4

Dear Ms. Marconi:

**Re: Greater Sudbury Hydro Inc. (Greater Sudbury Hydro)  
Application for 2025 Electricity Distribution Rates  
Ontario Energy Board File Number: EB-2024-0026**

In accordance with Procedural Order No. 1, OEB staff advises the OEB that parties have come to an agreement to revise the standard Issues List for Greater Sudbury Hydro's 2025 distribution rate application. The proposed revised Issues List is attached and includes the following revisions:

- Change to Issue 1.1
- Addition of Issues 1.3 and 1.4
- Change to Issue 5.2

Further, parties are requesting that the OEB waive the requirement under rule 26.02(e)(ii) of the *Rules of Practice and Procedure* that the interrogatories correspond to the issues list. Parties are requesting that they may file interrogatories according to the exhibit numbers in the application. Parties believe this approach is more efficient and likely less costly.

OEB staff also advises that parties indicated that, given that the proposed revised Issues List was prepared prior to the interrogatory process, parties may wish to raise additional matters for inclusion on the Issues List after the responses to the interrogatories are received.

Yours truly,

Birgit Armstrong  
Senior Advisor – Electricity Distribution Rates

Cc: All parties in EB-2024-0026

**SCHEDULE A**

**Greater Sudbury Hydro**

**EB-2024-0026**

**PROPOSED ISSUES LIST**

## **Proposed Issues List**

### **1. Capital Spending and Rate Base**

- 1.1 Are the proposed capital expenditures and in-service additions, with the exception of the Advanced Capital Module (ACM) projects, appropriate?
- 1.2 Are the proposed rate base and depreciation amounts appropriate?
- 1.3 Is the in-service addition of the Cressey (MS3) Substation ACM project appropriate?
- 1.4 Is the proposed ACM for the Moonlight (MS18) Substation Rebuild appropriate?

### **2. OM&A**

- 2.1 Are the proposed OM&A expenditures appropriate?
- 2.2 Is the proposed shared services cost allocation methodology and the quantum appropriate?

### **3. Cost of Capital, PILs, and Revenue Requirement**

- 3.1 Is the proposed cost of capital (interest on debt, return on equity) and capital structure appropriate?
- 3.2 Is the proposed PILs (or Tax) amount appropriate?
- 3.3 Is the proposed Other Revenue forecast appropriate?
- 3.4 Have all impacts of any changes in accounting standards, policies, estimates and adjustments been properly identified and recorded, and is the rate-making treatment of each of these impacts appropriate?
- 3.5 Is the proposed calculation of the Revenue Requirement appropriate?

### **4. Load Forecast**

- 4.1 Is the proposed load forecast methodologies and the resulting load forecasts appropriate?

### **5. Cost Allocation, Rate Design, and Other Charges**

- 5.1 Are the proposed cost allocation methodology, allocations, and revenue-to-cost ratios, appropriate?
- 5.2 Is the proposed rate design, including fixed/variable splits and the proposed change to 30-day fixed charges, appropriate?
- 5.3 Are the proposed Retail Transmission Service Rates and Low Voltage rates appropriate?
- 5.4 Are the proposed loss factors appropriate?
- 5.5 Are the Specific Service Charges and Retail Service Charges appropriate?

5.6 Are rate mitigation proposals required and appropriate?

**6. Deferral and Variance Accounts**

6.1 Are the proposals for deferral and variance accounts, including the balances in the existing accounts and their disposition, requests for new accounts, requests for discontinuation of accounts, and the continuation of existing accounts, appropriate?

**7. Other**

7.1 Is the proposed effective date appropriate?

7.2 Has the applicant responded appropriately to all relevant OEB directions from previous proceedings?