

February 11, 2025  
Nancy Marconi, Registrar  
Ontario Energy Board  
P.O. Box 2319 27th Floor  
2300 Yonge Street  
Toronto ON M4P 1E4

**Attention: Nancy Marconi, Registrar**  
**Regarding: EB-2024-0050 – Reply to OEB Staff Submission on January 28, 2025 for the Ottawa River Power Corporation 2025 Incentive Rate-Setting Mechanism Application for rates effective May 1, 2025 (the “Application”)**

Dear Ms. Marconi,

Ottawa River Power Corporation respectfully submits their reply to the OEB Staff submission on January 28, 2025, pursuant to Procedural Order No. 1.

ORPC confirms that the responses do not include any personal information, as identified in the certification requirements for personal information in Chapter 1 of the filing requirements.

Respectfully submitted,



Justin Allen  
President & CEO  
Ottawa River Power Corporation  
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### **Reply to OEB Staff Submission**

OEB Staff submitted that it has no issue with the proposed Low Voltage Service Rates. ORPC is not opposed to this OEB Staff submission.

OEB Staff submitted that it supports the request to dispose of its LRAMVA balance. ORPC is not opposed to this OEB Staff submission.

OEB Staff submitted that it supports final disposition of ORPC's Accounts 1588 and 1589 and Group 1 balances related to the 208 through 2022 calendar years. Additionally, OEB Staff supports ORPC's request to dispose balances that accumulated in the 2023 calendar year for its Group 1 DVAs on a final basis. ORPC is not opposed to this OEB Staff submission.

OEB Staff submitted that it does not take issue with the OEB making final ORPC's Power Purchase True-Up Rate in its 2024 IRM decision and the proposed 2025 credit per kWh amount. Additionally, OEB staff submitted that it "is concerned with the significant formula change to the model, as indicated in the response to interrogatories, impacting tab "Power Purchased True-Up" column N "Adjustment for audited variances (2-year lag) and Overcollection", specifically the 2026 and forward rate years' "Power Purchased True-Up" rates. OEB staff submits that ORPC should perform another detailed review of this spreadsheet before its next rate application filing, including an assessment of the appropriateness of the above-noted formula change. Findings from the detailed review should be included in ORPC's evidence for its 2026 IRM proceeding." ORPC is not opposed to making final ORPC's Power Purchase True-Up Rate in its 2024 IRM decision and the proposed 2025 credit per kWh amount. However, ORPC would note that the formula change noted by OEB staff concerns a formula correction related to the calculation of variances of amounts that have not yet materialized. The formula error was caused by an adjustment to make the cells equal \$0 until each component of the variance calculation was available. ORPC acknowledges this error, however, the error has been corrected and the formulas in the revised model reference the same cells that were referenced in the original model filed in ORPC's 2024 IRM application. Additionally, it would have been clear that the outputs in the summary table did not match the input values had there been values to be reconciled, but since the relevant formulas relate to variances in future years the outputs are correctly \$0. OPRC will ensure the 2026 Power Purchased True-Up rate is calculated properly when the values relevant to that rate are available, as it did for the 2025 rate that OEB Staff agrees is appropriate. Staff has not identified any errors in the current model or any errors used to calculate the rate it is proposing in this application in either the original or revised model, so ORPC does not agree that a detailed review of the model is warranted.