



February 28, 2025

Ontario Energy Board
2300 Yonge Street
27th Floor, P.O. Box 2319 Toronto,
ON M4P 1E4

**Rideau St. Lawrence Distribution Inc.
2025 IRM Application
Ontario Energy Board File Number EB-2024-0053
Response to Draft Decision and Rate Order**

Dear Ms. Marconi,

Rideau St. Lawrence Distribution Inc. (RSL) has reviewed the Board's Draft Rate Order issued February 26, 2025, with respect to the above noted proceeding.

RSL notes that the interest projection amendments made in Tab 3 Continuity Schedule of the Rate Generator Model were not reflected in the excel model attached with the draft decision and rate order. The amendments were made in response to question 1-Staff-4 in the set of questions dated December 13, 2024. RSL provided a revised Rate Generator Model incorporating these changes on December 13, 2024 as well as on January 28, 2025 with other minor requested amendments. The Rate Generator Model section showing the amendments is provided on the following page for clarity. Please incorporate these changes into the final Rate Generator Model. Please note these changes will be carried through and result in slight amendments to other tabs in the model once the Excel Macro functions are executed. The impacted tabs in the Rate Generator Model are: 4. Billing Det for Def-Var, 5. Allocating Def-Var Balances, 6.1 GA, 6.2 CBR B, 7. Calculation of Def-Var RR, 20. Final Tariff Schedule, and 21. Bill Impacts.

		BQ	BR	BS	BT	BU	BV	BW
		Projected Interest on Dec-31-2024 Balances				2.1.7 RRR ⁵		
Account Descriptions	Account Number	Projected Interest from Jan 1, 2024 to Dec 31, 2024 on Dec 31, 2023 balance adjusted for disposition during 2024 ¹	Projected Interest from Jan 1, 2025 to Apr 30, 2025 on Dec 31, 2023 balance adjusted for disposition during 2024 ²	Total Interest	Total Claim	Account Disposition: Yes/No?	As of Dec 31, 2023	Variance RRR vs. 2023 Balance (Principal + Interest)
Group 1 Accounts								
LV Variance Account	1550	(3,408)	(804)	(3,312)	(69,552)		(88,388)	0
Smart Metering Entity Charge Variance Account	1551	(972)	(229)	(1,271)	(20,159)		(36,871)	0
RSVA - Wholesale Market Service Charge ³	1580	(5,345)	(1,260)	(10,503)	(114,384)		161,200	8,175
Variance WMS - Sub-account CBR Class A ⁴	1580	0	0	0	0		0	0
Variance WMS - Sub-account CBR Class B ⁵	1580	1,097	259	1,270	22,583		0	(8,175)
RSVA - Retail Transmission Network Charge	1584	703	166	(1,905)	11,752		145,492	0
RSVA - Retail Transmission Connection Charge	1586	185	44	(577)	3,027		8,056	0
RSVA - Power ⁶	1588	5,075	1,197	6,665	105,301		214,568	(929)
RSVA - Global Adjustment ⁴	1589	16,002	3,774	28,114	339,143		218,658	0
Disposition and Recovery/Refund of Regulatory Balances (2019) ³	1595	0	0	172	0	No	2,745	0
Disposition and Recovery/Refund of Regulatory Balances (2020) ³	1595	(180)	(42)	(13,789)	(17,281)	Yes	(17,059)	0
Disposition and Recovery/Refund of Regulatory Balances (2021) ³	1595	(247)	(58)	3,347	0	No	(1,143)	0
Disposition and Recovery/Refund of Regulatory Balances (2022) ³	1595	3,038	716	14,002	0	No	69,288	1
Disposition and Recovery/Refund of Regulatory Balances (2023) ³	1595	3,982	939	22,394	0	No	94,875	(1)
Disposition and Recovery/Refund of Regulatory Balances (2024) ³	1595					No		
<i>Not to be disposed of until two years after rate rider has expired and that balance has been audited. Refer to the Filing Requirements for disposition eligibility.</i>								
RSVA - Global Adjustment requested for disposition	1589	16,002	3,774	28,114	339,143		218,658	0
Total Group 1 Balance excluding Account 1589 - Global Adjustment requested for disposition		3,928	926	16,496	(78,713)		552,763	(928)
Total Group 1 Balance requested for disposition		19,931	4,700	44,609	260,430		771,421	(928)
LRAM Variance Account (only input amounts if applying for disposition of this account) Impacts Arising from the COVID-19 Emergency, Sub-account Forgone Revenues from Postponing Rate Implementation ⁴	1568			0	0		0	0
	1509			0	(0)			(2,140)
Total Group 1 balance including Account 1568 and Account 1509 requested for disposition		19,931	4,700	44,609	260,430		771,421	(928)

With the revised interest projections, the 2023 year-end net balance for RSL's Group 1 accounts eligible for disposition, including interest projected to April 30, 2025, is a debit of \$260,430. This is accurately stated in the draft decision and rate order, however the changes are not reflected in the Tariff Schedule within the same document. Please amend the Final Tariff Schedule using the rates that reflect the revised interest projections. Specifically, the rates that require amending are outlined below:

- GENERAL SERVICE 50 TO 4,999 KW SERVICE CLASSIFICATION: Rate Rider for Disposition of Deferral/Variance Accounts (2025) - effective until April 30, 2026 – should be \$/kW (0.2612)
- SENTINEL LIGHTING SERVICE CLASSIFICATION - Rate Rider for Disposition of Deferral/Variance Accounts (2025) - effective until April 30, 2026 – should be \$/kW (0.2918)
- STREET LIGHTING SERVICE CLASSIFICATION - Rate Rider for Disposition of Deferral/Variance Accounts (2025) - effective until April 30, 2026 – should be \$/kW (0.2888)

RSL is satisfied with the accuracy and completeness of the draft rate order other than the changes listed above.

Yours truly,



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