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2711 Hunt Club Road / chemin Hunt Club
PO Box 8700 / C.P. 8700
Ottawa, Ontario K1G 3S4

Hydro Ottawa Limited
Hydro Ottawa limitée
hydroottawa.com

By RESS and Email

December 3, 2021

Ms. Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
PO Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON, M4P 1E4

Dear Ms. Long:

Subject: **Electricity Distribution Licence No. ED-2002-0556**
2022 Electricity Distribution Rate Application (EB-2021-0035) - Application Updated, Appendices and Models

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On August 18th, 2021, Hydro Ottawa submitted its 2022 application for distribution rates, as per its 2021-2025 Custom Incentive Rate-setting Application (EB-2019-0261).

As such, please see the attached Hydro Ottawa Updated Application, Excel Appendices and Models which reflect the Inflationary factor released by the OEB on November 18, 2021. As advised by the OEB, Hydro Ottawa has incorporated the interim province-wide wireline pole attachment charge into the updated application, given that the "OEB does not anticipate the pole attachment charge to be finalized in time for setting Hydro Ottawa's 2022 distribution rates."[1]

Please see a list of the attached Updated Excel Appendices and Models:

- Updated OEB Appendix 2-A
- Updated Attachment 4-3-1(A): OEB Workform - 2022 Income Tax/PILS Workform
- Updated Attachment 6-1-1(A): OEB Workform - 2022 Revenue Requirement Workform
- Updated Attachment 8-10-1(A): OEB Workform - 2021 Current and 2022 Proposed Tariff of Rates and Charges
- Updated Attachment 8-7-1(A): Dry Core Calculations

Please do not hesitate to contact me if you require anything further.

Yours truly,

DocuSigned by:
April Barrie
1E403775748B4CB...

April Barrie
Director, Regulatory Affairs
Directeur, Affaires réglementaires
aprilbarri@hydroottawa.com
Tel./tél.: 613 738-5499 | ext./poste 2106
Cell.: 613 808-3261

[1] Ontario Energy Board, Letter re: EB-2021-0035 Hydro Ottawa Limited - Application for 2022 Rates Pole Attachment Guidance (November 29, 2021)

2711 Hunt Club Road / chemin Hunt Club
PO Box 8700 / C.P. 8700
Ottawa, Ontario K1G 3S4

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2022 APPLICATION UPDATED SUMMARY

1. INTRODUCTION

Hydro Ottawa Limited ("Hydro Ottawa" or "the utility") filed its 2022 Electricity Distribution Rate Application ("Original Application") on August 18, 2021. It represented Hydro Ottawa's year two rate update under its five-year Custom Incentive Rate-Setting ("Custom IR") plan. As part of the 2021-2025 Approved Settlement Agreement,[1] the Parties[2] agreed to specific annual and mid-term adjustments over the Custom IR Term. The following outlines the update of the Original Application, which has resulted from the release of the OEB Decision on the incentive rate-setting under Price Cap IR and Annual Index plans for the year 2022 on November 18, 2021 and the continuation of the interim pole attachment rates.

As described in the Original Application, Hydro Ottawa agreed to update its 2022 proposed revenue requirement and rates and charges when the OEB publishes its "2022 Inflationary Factor". The adjustments to Hydro Ottawa's revenue requirement, rates and other charges set forth in this update are wholly consistent with the Approved Settlement Agreement and the related OEB Decisions.

By way of the Original Application and as adjusted by this update to its application, Hydro Ottawa is seeking the OEB's approval for proposed electricity distribution rates and other charges, effective January 1, 2022.

2. ANNUAL ADJUSTMENTS

As a placeholder in Hydro Ottawa's Original Application, the OEB's 2021 inflation factor of 2.2% was used in calculating its proposed Working Capital Allowance, Operations Maintenance & Administration ("OM&A"), Custom Price Escalation Factor ("CPEF"), Specific Service Charges ("SSCs") and resulting proposed 2022 revenue requirement and rates and charges. With the

[1] Hydro Ottawa Limited, *2021-2025 Custom Incentive Rate-Setting Approved Settlement Proposal*, EB-2019-0261 (September 18, 2020).
[2] Hydro Ottawa and the following intervenor groups: Building Owners and Managers Association, Consumers Council of Canada, Distributed Resource Coalition, Environmental Defence, Energy Probe Research Foundation, Pollution Probe, School Energy Coalition, Vulnerable Energy Consumers Coalition.

release of the OEB inflation factor for 2022 incentive rate-setting under Price Cap IR and Annual Index plans, Hydro Ottawa has updated its Application to incorporate the OEB's designated 2022 inflation factor of 3.3%.

Please see Table 1 below for a summary of the agreed annual and mid-term adjustments. For the 2022 term, only the annual adjustments apply.

Table 1 - Summary of Annual and Mid-Term Adjustments

#	Item	Timing	Adjustment Description
1	Working Capital Allowance	Annual	Use of OEB's annual inflation factor (with no productivity or growth factor)
2	Cost of Capital - ROE[3]	Mid-term adjustment (for 2024 and 2025)	Use of OEB's Fall 2023 deemed ROE results for 2024 and 2025
3	Cost of Capital - Long-Term Debt Rate	Set	Set for all years
4	Cost of Capital - Short-Term Debt Rate	Set	Set for all years
5	Inflation Factor for OM&A	Annual	Use of OEB's annual inflation factor
6	Specific Service Charges[4]	Annual	"I minus X" component of modified Custom Price Escalation Factor (i.e. OEB inflation factor minus 0.45% stretch factor)
7	Low Voltage Charges	Annual	Based on updated Transmission Connection rates
8	Retail Transmission Service Rates	Annual	Based on OEB-approved adjustments to the Hydro One Networks' Uniform Transmission Rates ("UTRs") using the RTSR model
9	Deferral Accounts	In accordance with OEB policy	Disposition of Group 1 and Group 2 accounts will be in accordance with applicable OEB policy
10	Third Party Non-Distribution Charges	Ad hoc	Further to OEB direction

[3] As stated in the 2021-2025 Approved Settlement Agreement, if the OEB revises its underlying methodology for calculating ROE in advance of Hydro Ottawa's scheduled adjustment for 2024 and 2025, then the updated ROE for 2024 and 2025 will be the lower of the following: (i) the ROE rate established by the OEB for 2024, based upon the revised methodology, or (ii) the ROE rate calculated for 2024 in September 2023 using the OEB's current formulaic methodology for determining deemed ROE as documented in the Report of the Board on the Cost of Capital for Ontario's Regulated Utilities, issued December 11, 2009.

[4] This does not include the Access Power Poles - Wireline charge, for which Hydro Ottawa will continue to use the OEB's generic charge.

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PO Box 8700 / C.P. 8700
Ottawa, Ontario K1G 3S4

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3. UPDATED RATE BASE

As part of the 2021-2025 Approved Settlement Agreement,[5] both gross and net capital additions have been set for the five year term, however, Hydro Ottawa's working capital allowance will be updated using OEB's annual inflation factor (with no productivity or growth factor), as discussed in Exhibit 2-3-1: Working Capital Requirement.

Hydro Ottawa's working capital allowance has been updated using the OEB's 2022 Inflation Factor. This update changes Hydro Ottawa's Rate Base, which is incorporated into its 2022 proposed revenue requirement and rates and charges. Table 2 provides a summary of Hydro Ottawa's Rate Base for 2021 Approved, 2022 Originally proposed, 2022 Updated, as well as the change between Updated and Proposed for 2022:

Table 2 – Summary of Rate Base 2021-2022 ($'000s)[6]

	2021 Approved	2022 Original	2022 Updated	Change
Opening Net Book Value	$1,083,600	$1,182,840	$1,182,840	$0
Closing Net Book Value	$1,182,840	$1,248,271	$1,248,271	$0
Average Net Fixed Assets	**$1,133,220**	**$1,215,555**	**$1,215,555**	**$0**
Working Capital Allowance	$85,459	$87,339	$88,279	$940
RATE BASE	**$1,218,679**	**$1,302,894**	**$1,303,835**	**$940**

Table 3 below provides a summary of Hydro Ottawa's Working Capital Allowance for 2021 Approved, 2022 Originally proposed, 2022 Updated and the change between Updated and Proposed for 2022:

[5] Hydro Ottawa Limited, *2021-2025 Custom Incentive Rate-Setting Approved Settlement Proposal*, EB-2019-0261 (September 18, 2020).
[6] Totals may not sum due to rounding.

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PO Box 8700 / C.P. 8700
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Table 3 – Working Capital Allowance 2021-2022 ($'000s)

	2021 Approved	2022 Original	2022 Updated	+/-
Power Supply Expenses	$1,048,856	$1,071,931	$1,083,468	$11,537
OM&A Expenses	$90,600	$92,593	$93,590	$997
Total Expenses for Working Capital	$1,139,456	$1,164,524	$1,177,058	$12,534
Working Capital %	7.50%	7.50%	7.50%	0.00%
Total WCA	**$85,459**	**$87,339**	**$88,279**	**$940**

4. OTHER REVENUE SUMMARY

Hydro Ottawa's Other Revenue include the following categories: SSCs, Late Payment Charges, Other Operating Revenue, and Other Income and Deductions. Some portions of Other Revenue have been set for the Custom IR term, while a portion of the rates and charges that are incorporated into the proposed Other Revenue will be updated annually. The change to Hydro Ottawa's CPEF is described below in Section 5.

Table 4 below provides an update to Hydro Ottawa's Specific Service Charge Revenue for 2022. SSCs are escalated over the 2021-2025 period using the "I minus X" component of the CPEF, while the OEB generic charge is used for the pole attachment revenue. There were no other changes to Other Revenue sources for 2022, as the expected revenues for Other Operating Revenues were agreed to for all five years of Hydro Ottawa's 2021-2025 Custom IR term, as per the 2021-2025 Approved Settlement Agreement.[7]

[7] Hydro Ottawa Limited, *2021-2025 Custom Incentive Rate-Setting Approved Settlement Proposal*, EB-2019-0261 (September 18, 2020), p. 30.

Table 4 – Updated Other Revenue Summary 2022 ($'000s)

	2021 Approved	2022 Original	2022 Updated	Change
Specific Service Charges (4235)	$5,119	$5,382	$5,243	$(139)
Late Payment Charges (4225)	$1,000	$1,000	$1,000	$0
Other Operating Revenue (4082, 4084, 4086, 4090)	$1,456	$1,462	$1,462	$0
Other Income & Deductions (4315, 4325, 4330, 4362, 4375, 4405)	$2,105	$1,691	$1,691	$0
TOTAL OTHER REVENUE	**$9,680**	**$9,536**	**$9,397**	**$(139)**

5. OPERATING EXPENSES

5.1 Operations, Maintenance and Administration

Under a Price Cap IR, rates are adjusted using a formulaic approach in the years following the first year base rates. For Hydro Ottawa's 2022-2025 term, a modified CPEF was agreed to in Hydro Ottawa's Approved Settlement Agreement.[8] Hydro Ottawa's CPEF has been updated from the placeholder value of 2.09% used in the Original Application to 3.19% as updated by the 2022 Inflationary Factor. Table 5 provides detailed calculation on the updated CPEF.

Table 5 – Update Custom Price Escalation Factor

Component	As per Settlement Proposal
Inflation factor ("I")	• Uses the OEB inflation rate for incentive rate-setting under Price Cap IR and Annual Index plans, 3.3% for 2022 • Uses standard OEB labour/non-labour weighting factors • Updated Annually
Productivity factor ("X")	• 0.45% (0% Total Productivity Factor plus 0.45% stretch factor) • Fixed for duration of Custom IR term
Growth factor ("G")	• 0.34% • Fixed for duration of Custom IR term
Total CPEF Value: (I - X)	• 3.3% - 0.45% +0.34% = 3.19%[9]

[8] Ibid.
[9] 3.3% noted in EB-2021-0212, Decision and Order on 2022 inflationary factors, issued November 18, 2021

As per the 2021-2025 Approved Settlement Agreement, the Parties agreed to set the 2021 Test Year OM&A funding envelope at $90.6M. Table 6 provides Hydro Ottawa's approved 2021 base year OM&A, the 2022 OM&A incorporated into the originally proposed 2022 revenue requirement and the updated OM&A incorporated into the updated 2022 revenue requirement.

Table 6 – Recoverable OM&A 2021-2022 ($'000s)

2021 Approved	2022 Original	2022 Updated	Change
$90,600	$92,494	$93,490	$996

5.2 PAYMENTS IN LIEU OF TAXES

It was agreed in the 2021-2025 Approved Settlement Agreement that Payments in Lieu Of Taxes ("PILS") would be updated annually for changes to rate base as a result of the update to working capital allowance. In addition, it was agreed that PILS would be updated for return on equity as part of the mid-term update in 2024. For further information, please refer to Exhibit 2-3-1: Working Capital Requirement, Exhibit 4-3-1: Payments in Lieu of Taxes and Exhibit 5-1-1: Cost of Capital and Capital Structure.

Hydro Ottawa has updated the 2022 PILS amounts due to the change in working capital allowance as explained in section 3 above. The Updated 2022 PILS calculations have been provided in Excel as Updated Attachment 4-3-1(A): OEB Workform - 2022 Income Tax/PILS Workform.

Table 7 below depicts Hydro Ottawa's Approved 2021 base year PILS, the 2022 PILS incorporated into the originally proposed 2022 revenue requirement and the updated PILS incorporated into the updated 2022 revenue requirement.

2711 Hunt Club Road / chemin Hunt Club
PO Box 8700 / C.P. 8700
Ottawa, Ontario K1G 3S4

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Table 7 – Corporate PILS ($'000s)[10]

2021 Approved	2022 Original	2022 Updated	Change
$891	$2,119	$2,131	$11

6. CALCULATION OF REVENUE DEFICIENCY AND SURPLUS

Hydro Ottawa's 2022 revenue requirement has been updated due to changes to Working Capital Allowance, OM&A, and SSCs. The updates have also been incorporated into the Updated 2022 Revenue Requirement Workforms ("RRWF") attached to this Schedule:

- Updated Attachment 6-1-1(A): OEB Workform - 2022 Revenue Requirement Workform

Table 8 below provides Hydro Ottawa's approved 2021 revenue requirement, the 2022 originally proposed revenue requirement and the 2022 updated revenue requirement.

[10] Totals may not sum due to rounding.

Table 8 – Revenue Deficiency/Sufficiency for 2021-2022 ($'000s)[11]

	2021 Approved	2022 Original	2022 Updated	Change
Return on Rate Base	$64,029	$68,445	$68,503	$58
Distribution Expenses (not including amortization)	$90,600	$92,494	$93,490	$996
Depreciation, amortization	$51,956	$55,472	$55,472	$0
Payment in Lieu of Taxes	$891	$2,119	$2,131	$11
Service Revenue Requirement	**$207,477**	**$218,539**	**$219,597**	**$1,058**
Less Capital Stretch Factor	$0	$775	$776	$1
Service Revenue Requirement Net of Capital Stretch Factor	**$207,477**	**$217,764**	**$218,821**	**$1,057**
Less Revenue Offsets	$9,680	$9,536	$9,397	($139)
Base Revenue Requirement	**$197,797**	**$208,228**	**$209,423**	**$1,195**
Transformer Ownership Credit	$1,065	$1,069	$1,069	($0)
Revenue Requirement from Rates	**$198,861**	**$209,297**	**$210,492**	**$1,195**
Forecasted Load at 2020 Rates	$188,518	$189,731	$189,731	($0)
Cumulative Revenue Deficiency (over 2020)	**($10,344)**	**($19,566)**	**($20,761)**	**($1,195)**
Yearly Revenue Deficiency over 2020	**($10,344)**	**($9,222)**	**($10,417)**	**($1,195)**

7. RATE DESIGN

7.1 Fixed/Variable Proportion

Hydro Ottawa's approved 2021 and proposed updated 2022 tariffs of rates and charges are provided in Updated Attachment 8-10-1(A): OEB Workform - 2020 Current and 2021 Proposed Tariff of Rates and Charges.

The updated revenue requirement outlined in section 6 above has not changed the 2022 proposed fixed/variable splits ratios as outlined in Table 2 of Exhibit 8-1-1: Fixed/Variable Proportion.

[11] Totals may not sum due to rounding.

The Distribution charge for the Residential customer class has been set at 100% fixed. As directed, fixed rates for the three commercial classes have been held constant in 2022 and the variable rates have been adjusted accordingly for the updated proposed revenue requirement for each of the classes. Table 9 summarizes the 2021 approved, 2022 proposed and 2022 update fixed and variable charges by rate class.

Table 9 – Approved and Proposed Fixed/Variable Charges 2021-2022 ($'000s)

	2021 Approved		2022 Original		2022 Updated		2022 Change	
	Fixed $	Variable $/kWh or $/kW	Fixed $	Variable $/kWh or $/kW	Fixed $	Variable $/kWh or $/kW	Fixed $	Variable $/kWh or $/kW
Residential	$29.32	$0.0000	$30.59	$0.0000	$30.77	$0.0000	$0.18	$0.0000
GS < 50 kW	$19.76	$0.0256	$20.72	$0.0268	$20.83	$0.0270	$0.11	$0.0002
GS 50 to 1,499 kW	$200.00	$5.2905	$200.00	$5.6065	$200.00	$5.6423	$0.00	$0.0358
GS 1,500 to 4,999 kW	$4,193.93	$4.8106	$4,193.93	$5.1311	$4,193.93	$5.1687	$0.00	$0.0376
Large Use	$15,231.32	$4.7117	$15,231.32	$5.0407	$15,231.32	$5.0761	$0.00	$0.0354
Unmetered Scattered Load	$5.37	$0.0255	$5.77	$0.0274	$5.80	$0.0276	$0.03	$0.0002
Sentinel Lighting	$3.88	$18.2019	$4.60	$21.5536	$4.63	$21.7203	$0.03	$0.1667
Street Lighting	$0.96	$6.6705	$1.00	$6.9909	$1.01	$6.9763	$0.01	-$0.0146
Standby Power GS 50 to 1,499 kW	$153.14	$2.0437	$161.61	$2.1566	$162.65	$2.0449	$1.04	-$0.1117
Standby Power GS 1,500 to 4,999 kW	$153.14	$1.8746	$161.61	$1.9782	$162.65	$1.9910	$1.04	$0.0128
Standby Power Large Use	$153.14	$2.0803	$161.61	$2.1953	$162.65	$2.0816	$1.04	-$0.1137

7.2 Retail Service Charges

As accepted as part of the 2021-2025 Settlement Agreement, Hydro Ottawa will continue to use the OEB generic Retail Service Charges ("RSC") for 2021-2025. Hydro Ottawa has updated its 2022 RSC rates in accordance with those prescribed in the OEB's Decision and Order EB-2021-0301. Table 10 below summarizes the 2021 approved, 2022 originally proposed and 2022 Updated RSC rates and are included in Hydro Ottawa's Updated attachment 8-10(A)_OEB Workform - 2021 Current and 2022 Proposed Tariff of Rates and Charges.

Table 10 – Retail Service Charges 2021-2022 ($'000s)

	2021 Approved	2022 Original	2022 Updated	Change
Standard Charge	$104.04	$106.53	$107.68	$1.15
Monthly Fixed Charge	$41.62	$42.62	$43.08	$0.46
Monthly Variable Charge	$1.04	$1.06	$1.07	$0.01
Distributor consolidated billing charge	$0.62	$0.63	$0.64	$0.01
Retailer consolidated billing credit	$(0.62)	$(0.63)	$(0.64)	$(0.01)
Service Transaction Requests, per request	$0.52	$0.53	$0.54	$0.01
Service Transactions Requests, per process	$1.04	$1.06	$1.07	$0.01
Electronic Business Transaction, up to two per year	$0.00	$0.00	$0.00	$0.00
Electronic Business Transaction, more than two, per request	$4.17	$4.26	$4.31	$0.05

7.3 Specific Service Charges

As outlined in section 4 above, some SSC rates are updated annually. Hydro Ottawa's SSCs listed below include rates that have been updated using the escalation factor increase of 2.85% as established in the 2021-2025 Approved Settlement Agreement, which uses the CPEF for OM&A excluding the growth component of the factor.[12] For some charges, after rounding, the change in escalation factor has not resulted in a change in the charge.

1. Arrears Certificate
2. Easement Certificate for Unregistered Easements
3. Duplicate Invoices for Previous Billing
4. Special Billing Service, per hour
5. Credit Reference/Credit Check (+ credit agency costs)
6. Unprocessed Payment Charge (+ bank charges)
7. Account Set Up/Change of Occupancy Charge
8. Interval Meter - Field Reading

[12] Hydro Ottawa Limited, 2021-2025 *Custom Incentive Rate-Setting Approved Settlement Proposal*, EB-2019-0261 (September 18, 2020) p. 28.

2711 Hunt Club Road / chemin Hunt Club
PO Box 8700 / C.P. 8700
Ottawa, Ontario K1G 3S4

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9. High Bill Investigation - If Billing is Correct
10. Non-Payment of Account - Reconnect at Meter
11. TS-I&R - Overhead - no transformer
12. TS-I&R - Underground - no transformer
13. TS-I&R - Overhead - with transformer
14. ERF Administration Charge Without Account Set Up

Table 11 below summarizes the 2021 approved, 2022 originally proposed and 2022 updated SSCs and are included in Hydro Ottawa's Updated attachment 8-10(A) _OEB Workform - 2021 Current and 2022 Proposed Tariff of Rates and Charges.

2711 Hunt Club Road / chemin Hunt Club
PO Box 8700 / C.P. 8700
Ottawa, Ontario K1G 3S4

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Table 11 – Update Specific Service Charge

	2021 Approved	2022 Proposed	2022 Updated	Change
Customer Administration				
Arrears Certificate	$16.00	$16.00	$16.00	$0.00
Easement Certificate for Unregistered Easements	$25.00	$26.00	$26.00	$0.00
Duplicate Invoices for Previous Billing	$5.00	$6.00	$6.00	$0.00
Special Billing Service, per hour	$122.00	$125.00	$126.00	$1.00
Credit Reference/Credit Check (+ credit agency costs)	$16.00	$16.00	$16.00	$0.00
Unprocessed Payment Charge (+ bank charges)	$25.00	$26.00	$26.00	$0.00
Account Set Up/Change of Occupancy Charge	$25.00	$26.00	$26.00	$0.00
Interval Meter - Field Reading	$314.00	$320.00	$323.00	$3.00
High Bill Investigation - If Billing is Correct	$237.00	$241.00	$243.00	$2.00
Non-Payment of Account				
Reconnect at Meter - Regular Hours	$67.00	$68.00	$69.00	$1.00
Reconnect at Meter - After Regular Hours	$100.00	$102.00	$103.00	$1.00
Reconnect at Pole - Regular Hours	$250.00	$255.00	$258.00	$3.00
Reconnect at Pole - After Regular Hours	$423.00	$430.00	$435.00	$5.00
Other				
Temporary Service - Install and Remove ("TS-I&R") - Overhead - no transformer	$881.00	$896.00	$906.00	$10.00
TS-I&R - Underground - no transformer	$1,278.00	$1,300.00	$1,314.00	$14.00
TS-I&R - Overhead - with transformer	$3,141.00	$3,196.00	$3,231.00	$35.00
Specific Charge to Access Power Poles - Wireline	$44.50	$46.48	$44.50	$(1.98)
Drycore Transformer Charge	8-7-1 (B)	8-7-1 (B)	8-7-1 (B)	
ERF Administration Charge Without Account Set Up	$142.00	$145.00	$146.00	$1.00

As part of the 2021-2025 Approved Settlement Agreement, the Parties agreed that Hydro Ottawa would use the OEB generic wireline pole attachment charge. However, the OEB has not yet released a final Decision and Order on the province-wide wireline pole attachment charge for 2021 and 2022. In its letter dated November 29, 2021, the OEB advised Hydro Ottawa that "The OEB does not anticipate the pole attachment charge to be finalized in time for setting Hydro

Ottawa's 2022 distribution rates and advises that Hydro Ottawa shall maintain the current interim pole attachment charge of $44.50 for setting 2022 rates."[13] Therefore Hydro Ottawa has used the interim rate for 2021 of $44.50[14] and incorporated the interim rate into this Update.

Hydro Ottawa continues to request that its current 2021 rates provided in Attachment 8-10-1(A): OEB Workform - 2021 Current and 2022 Proposed Tariff of Rates and Charges be declared interim effective January 1, 2022, as necessary if 2022 approvals cannot be issued by the OEB in time to implement final rates effective January 1, 2022. In such an event, Hydro Ottawa also requests the Board to approve establishment of an account that would provide for the recovery of differences between the interim rates and the approved rates, as determined by the OEB in its final Decision and Order.

7.4 Low Voltage and Retail Transmission Service Rates

Low Voltage Charges and Retail Transmission Service Rates have not been updated as Hydro One has not received approval of its 2022 Uniform Transmission Rates ("UTRs") for 2022 at the time of this updated filing.

7.5 Dry Core Transformer Charge

The 2022 dry core transformer charges have been adjusted to reflect changes to the relevant distribution variable rates. The updated rates are outlined in Updated Attachment 8-7-1(A): Dry Core Calculations.

7.6 Bill Impacts

Table 12 below provides an updated summary of bill impacts per rate class. Details of the impacts of the proposed rates are provided in Hydro Ottawa's Updated Attachment 8-10-1(A): OEB Workform - 2021 Current and 2022 Proposed Tariff of Rates and Charges.

[13] Ontario Energy Board, Letter re: EB-2021-0035, *Hydro Ottawa Limited - Application for 2022 Rates Pole Attachment Guidance,* (November 29, 2021)
[14] OEB letter to distributors, November 28, 2019.

2711 Hunt Club Road / chemin Hunt Club
PO Box 8700 / C.P. 8700
Ottawa, Ontario K1G 3S4

Hydro Ottawa Limited
Hydro Ottawa limitée
hydroottawa.com

Table 12 – Summary of Rate Impacts

Rate Class		2021 Approved	2022 Original	2022 Updated	2022 Change
Residential (750 kWh)	Distribution Charge	$29.06	$30.34	$30.52	$0.18
	Change in Distribution Charge		$1.28	$1.46	$0.18
	% Distribution Increase		4.40%	5.02%	0.62%
	% Increase of Total Bill		1.45%	1.59%	0.14%
Residential (232 kWh)	Distribution Charge	$29.06	$30.34	$30.52	$0.18
	Change in Distribution Charge		$1.28	$1.46	$0.18
	% Distribution Increase		4.40%	5.02%	0.62%
	% Increase of Total Bill		2.45%	2.75%	0.30%
General Service <50 kW (2000 kWh)	Distribution Charge	$70.76	$74.12	$74.63	$0.51
	Change in Distribution Charge		$3.36	$3.87	$0.51
	% Distribution Increase		4.75%	5.47%	0.72%
	% Increase of Total Bill		1.41%	1.57%	0.16%
General Service 50 kW - 1,499 kW (250 kW)	Distribution Charge	$1,469.73	$1,548.93	$1,557.88	$8.95
	Change in Distribution Charge		$79.20	$88.15	$8.95
	% Distribution Increase		5.39%	6.00%	0.61%
	% Increase of Total Bill		(0.62)%	(0.56)%	0.06%
General Service 1,500 kW - 4,999 kW (2,500 kW)	Distribution Charge	$15,800.68	$16,604.18	$16,698.18	$94.00
	Change in Distribution Charge		$803.50	$897.50	$94.00
	% Distribution Increase		5.09%	5.68%	0.59%
	% Increase of Total Bill		(0.61)%	(0.56)%	0.05%
Large Use (7,500 kW)	Distribution Charge	$49,069.82	$51,537.32	$51,802.82	$265.50
	Change in Distribution Charge		$2,467.50	$2,733.00	$265.50
	% Distribution Increase		5.03%	5.57%	0.54%
	% Increase of Total Bill		(0.85)%	(0.80)%	0.05%
Sentinel Lighting (0.4 kW)	Distribution Charge	$10.96	$13.02	$13.11	$0.09
	Change in Distribution Charge		$2.06	$2.16	$0.10
	% Distribution Increase		18.81%	19.69%	0.88%
	% Increase of Total Bill		9.08%	9.50%	0.42%
Street Lighting (1 kW)	Distribution Charge	$7.29	$7.65	$7.65	$0.00
	Change in Distribution Charge		$0.36	$0.35	$(0.01)
	% Distribution Increase		4.91%	4.85%	(0.06)%
	% Increase of Total Bill		1.55%	1.53%	(0.02)%
Unmetered Scattered Load (470 kWh)	Distribution Charge	$16.93	$18.18	$18.30	$0.12
	Change in Distribution Charge		$1.25	$1.37	$0.12
	% Distribution Increase		7.36%	8.09%	0.73%
	% Increase of Total Bill		2.01%	2.18%	0.17%

2711 Hunt Club Road / chemin Hunt Club
PO Box 8700 / C.P. 8700
Ottawa, Ontario K1G 3S4

Hydro Ottawa Limited
Hydro Ottawa limitée
hydroottawa.com

All of which is respectfully submitted this 3rd day of December, 2021.