



Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario M4P 1E4
Boardsec@oeb.ca

August 23, 2019

Sent via RESS and Courier

Dear Ms. Walli,

RE: EB-2019-0022 – Filing of GA Analysis Form and GA Appendix A

In its letter of August 12, BPI indicated it had filed its Application for rates effective January 1, 2020 however it had not yet been able to reconcile the Global Adjustment Variance Workform to the level required in the Filing Requirements, and that it would be filing the Workform and the associated Appendix A questions on 1588 and 1589 at a later date.

BPI has now completed its Global Adjustment Variance Workform and is submitting this work form as well as the responses to the Appendix A Questions. In completing the reconciliation, BPI identified a reconciling item which required an adjustment to the DVA continuity schedule. The adjustment relates to an over-accrual of the unbilled revenue in Account 1589 which was recorded in 2018, and has since been reversed in the 2019 General Ledger, amounting to \$484,889.

BPI has identified this as an item requiring an adjustment to the Principal amount for 1589 in the DVA Continuity Schedule and is submitting an updated Rate Generator model which has the requisite adjustment to 1589. The amount has been added to the original 2018 Principal adjustments (Cell BF29), which was previously a credit of \$(27,741), bringing the total principal adjustments in Account 1589 to \$457,148 (Cell BF29).

BPI's initial application did not propose any rate riders for the disposition of Group 1 Deferral and Variance Accounts as the total balance of Group 1 DVAs does not meet the threshold for disposition.



The updated total Group 1 DVA Balance still does not meet the threshold (see table below), and as a result there are no changes to the rates being proposed for recovery in this Application.

Updated Threshold Test

Total Claim for Threshold Test (All Group 1 Accounts)	\$285,972
Threshold Test (Total claim per kWh) ²	\$0.0003

Claim does not meet the threshold test.

BPI has submitted the following via RESS:

Brantford_GA-Analysis-Workform-Instructions_20190823 (pdf)

Brantford_2020-IRM-Rate-Generator_Revised_20190823 (excel)

Brantford_2020_GA_Analysis_Workform_20190823 (excel)

Please do not hesitate to contact me with any questions,

Sincerely,

Original Signed By

Oana Stefan
Manager of Regulatory Affairs
Brantford Power Inc.
Box 308, Brantford, Ontario N3T 5N8
Phone 519-751-3522 ext. 5477
ostefan@brantford.ca