2nd Generation rate adjustment mechanism for Electricity Distribution Sector

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Objectives of 2nd Generation "IRM"

- a. Provide regulatory certainty during the 2007-2009 period of the rate plan
- b. Drive out efficiencies improvements
- c. Lay a foundation for 3rd generation IRM

In fact, only a) was achievable

Objectives of 2nd Generation "IRM"

- During the proceeding most stakeholders agreed that:
 - There was insufficient quantitative evidence to suggest that there <u>exists</u> significant efficiencies to be "driven out" since the prolonged rate freeze period (3 tranches and Bill 210).
 - There was insufficient <u>time</u> to drive out efficiencies
 - There was no <u>incentive</u> to drive out efficiencies (any savings "clawed back" at rebasing)

2nd Generation "Price Adjustment Mechanism"

- Insufficient time to <u>understand</u> and take into account the rapidly changing and complex context in which LDCs are operating (but we have that now!)
- GDP-IPI selected because it was easily understood despite not providing an appropriate inflationary
- Generic X factor based on numerous North American jurisdictions
 - Similarities pretty much start and finish with the fact that we convey electricity at voltages no greater than 50kv
 - Our diversity, geography, ownership structure, productivity differences are all significantly different than all other North American jurisdictions
 - Generic x factor has punished the efficient LDCs and rewarded the less efficiency LDCs – completely opposite to what it is designed for!
- No adjustment for capital expenditures

2nd Generation "Price Adjustment Mechanism"

What we got was a

Transitional Price Adjustment Mechanism

Or Rate attrition mechanism

Benefits of 2nd Generation "Price Adjustment Mechanism"

- Price certainty
- Reduced regulatory burden (applications easy to process)
- Flexibility to self-elect re-basing year