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Ontario Energy Board
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RE: Brant County Power Inc. – 2012 3rd Generation IRM Application (EB-2011-0154) inaccurate Retail Transmissions Rates in draft Tariff Sheet

Brant County Power supplied evidence regarding host distributor transmission charges in our original 2012 3rd Generation IRM rate filing. Apparently this was not considered during the final rate approval process.

Our case manager has requested a letter outlining the impacts of the omission of the Brantford Transmission Charges.

Below is an excerpt of the originally filed evidence.

“BCP has completed the 2012 RTSR Adjustment model as required, which includes the Transmission Charges levied to BCP from both Hydro One and the IESO. Additionally, BCP also pays monthly Transmission charges to Brantford Power on 3 delivery points.

As the RTSR Adjustment Model does not allow for the addition of Host Distributor charges, BCP is providing the calculation below that incorporates the historical Brantford Power Transmission Charges into new applied for Retail Transmission Rates.

Summary of Brantford Power 2010 Network and Connection Charges

	Network			Connection		
	Billed Units	Rate	Charges	Billed Units	Rate	Charges
January	13,664	\$ 1.9843	\$ 27,113.44	14,771	\$ 1.6402	\$ 24,227.07
February	13,596	\$ 1.9843	\$ 26,977.89	14,316	\$ 1.6402	\$ 23,481.75
March	11,981	\$ 1.9843	\$ 23,773.86	12,291	\$ 1.6402	\$ 20,159.45
April	11,026	\$ 1.9843	\$ 21,878.15	11,026	\$ 1.6402	\$ 18,084.23
May	13,342	\$ 2.2939	\$ 30,604.31	13,342	\$ 1.7255	\$ 23,020.95
June	12,825	\$ 2.2939	\$ 29,418.30	12,825	\$ 1.7255	\$ 22,128.82
July	14,377	\$ 2.2939	\$ 32,978.44	14,377	\$ 1.7255	\$ 24,806.79
August	14,112	\$ 2.2939	\$ 32,371.61	14,112	\$ 1.7255	\$ 24,350.33
September	13,528	\$ 2.2939	\$ 31,032.30	13,528	\$ 1.7255	\$ 23,342.89
October	11,034	\$ 2.2939	\$ 25,311.21	11,061	\$ 1.7255	\$ 19,085.49
November	12,146	\$ 2.2939	\$ 27,862.37	12,146	\$ 1.7255	\$ 20,958.49
December	13,423	\$ 2.2939	\$ 30,791.95	13,475	\$ 1.7255	\$ 23,250.92
Total			\$340,113.83			\$266,897.18

Modified Output from 2012 RTSR Adjustment Model

Network: (note: output is from Tab 11. Adj. Network to Forecast WS)

Customer Class	Billed Amount (from RTSR Model)	2010 Brantford Network Charges	Total 2011 Estimated Network Charges	Loss Adjusted Billing Determinants (from RTSR Model)	Proposed RTSR Network Rates
Residential	\$ 349,687	\$ 118,533	\$ 468,219	90,449,643	0.0052 per kWh
GS less than 50kW	\$ 144,171	\$ 48,869	\$ 193,040	40,398,655	0.0048 per kWh
GS 50 to 4,999 kW	\$ 225,571	\$ 76,461	\$ 302,033	157,751	1.9146 per kW
GS 50 to 999 kW - Interval Metered	\$ 161,329	\$ 54,685	\$ 216,014	106,356	2.031 per kW
GS 1,000 to 4,999 kW - Interval Metered	\$ 115,610	\$ 39,188	\$ 154,798	76,129	2.0334 per kW
Unmetered Scattered Load	\$ 1,835	\$ 622	\$ 2,457	514,175	0.0048 per kWh
Sentinel Light	\$ 34	\$ 11	\$ 45	31	1.4512 per kW
Street Light	\$ 5,144	\$ 1,744	\$ 6,888	4,770	1.444 per kW
Total	\$ 1,003,380	\$ 340,114	\$ 1,343,493		

Connection: (note: output is from Tab 12. Adj. Conn. to Forecast WS)

Customer Class	Billed Amount (from RTSR Model)	2010 Brantford Connection	Total 2011 Estimated Connection Charges	Loss Adjusted Billing Determinants (from RTSR Model)	Proposed RTSR Network Rates
Residential	\$ 227,136	\$ 93,624	\$ 320,760	90,449,643	0.0035 per kWh
GS less than 50kW	\$ 89,652	\$ 36,954	\$ 126,606	40,398,655	0.0031 per kWh
GS 50 to 4,999 kW	\$ 143,440	\$ 59,125	\$ 202,566	157,751	1.2841 per kW
GS 50 to 999 kW - Interval Metered	\$ 106,875	\$ 44,053	\$ 150,929	106,356	1.4191 per kW
GS 1,000 to 4,999 kW - Interval Metered	\$ 75,883	\$ 31,278	\$ 107,161	76,129	1.4076 per kW
Unmetered Scattered Load	\$ 1,141	\$ 470	\$ 1,611	514,175	0.0031 per kWh
Sentinel Light	\$ 22	\$ 9	\$ 31	31	1.0135 per kW
Street Light	\$ 3,353	\$ 1,382	\$ 4,735	4,770	0.9926 per kW
Total	\$ 647,502	\$ 266,897	\$ 914,399		

Please note, the 2012 Rate Generator Model utilized the above rates."

The RTSR model sent with our draft Tariff sheet entitled "RTSR Final" reconciles to the above excerpt and the rates approved in the draft Tariff order match to the "RTSR Final" model. As a result the financial impact of not adjusting the RTSR rates to the rates identified above is an annual under recovery of \$340,114 for Network and an additional \$266,897 for Connection totalling to a total annual under recovery of Brantford Transmission charges of \$607,011.

The rates requested by Brant County Power are outlined in the original submission above.

If there are any questions, please contact me directly.

Sincerely,



Ian McKenzie

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