



**PUBLIC INTEREST ADVOCACY CENTRE
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Michael Janigan
Counsel for VECC

December 02, 2014

VIA MAIL and E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli:

**Re: Vulnerable Energy Consumers Coalition (VECC)
VECC Interrogatories EB-2014-0060
Cambridge and North Dumfries Hydro Inc.**

Please find enclosed the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Thank you.

Yours truly,

A handwritten signature in black ink, appearing to read 'Michael Janigan', is written over a horizontal line.

Michael Janigan
Counsel for VECC

cc: Cambridge and North Dumfries Hydro Inc.

ONTARIO ENERGY BOARD

IN THE MATTER OF

the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B), as amended;

AND IN THE MATTER OF an Application by
Cambridge and North Dumfries Inc. pursuant to section 78 of the
Ontario Energy Board Act for an order
approving just and reasonable rates and other charges
for the distribution of electricity effective May 1, 2015.

Information Requests of the Vulnerable Energy Consumers Coalition (VECC)

LRAMVA for 2011-2014

VECC-1

Ref: Application, Page 19

Preamble: CND is requesting recovery of \$282,127 in LRAMVA including forecast carrying charges of \$7,291 resulting from CDM activities in 2013, from 2011, 2012 and 2013 programs.

- a) Please confirm CND has not recovered any of the LRAM amounts proposed for recovery in this application in a previous application.
- b) Please provide the CDM component by customer class included in the load forecast that underpins the rates used to calculate the lost revenue in 2013.

VECC-2

Ref 1: Application, Page 20, lines 11-13

Ref 2: Application, Page 22, Table 9 Detailed Calculation of Lost Revenue

Preamble: At reference #1, CND provides the net energy savings for 2013 for all rate classes calculated by the OPA as 31,718,079 kWhs comprised of 2011, 2012 and 2013 programs based on the OPA's 2013 Draft Verified Results. CND indicates these amounts were used to determine the lost revenue amount of \$278,853 split between all customer classes.

At reference #2, the total kWh used in the LRAMVA calculation is shown as 4,279,395.

- a) Please explain the difference in kWh between reference #1 (31,718,079) and #2 (4,279,395) and compare to the kWh used in the calculation.
- b) Please explain how the total kW provided in the OPA's 2013 Draft Verified Results relates to the total kW used in Table 9 to calculate the lost revenue amount of \$278,853 split between all customer classes.
- c) Please provide the updated net energy kWh and kW savings for 2013 for 2011, 2012 and 2013 programs based on the OPA's 2013 Final Verified Results.
- d) Please provide a copy of the OPA's 2013 Final Verified Results.
- e) Please update Table 9 to reflect the OPA's 2013 Final Verified Results.

VECC-3

Ref: Application, Page 20, lines 19-22

Preamble: CND has calculated the LRAM amounts and associated carrying charges applied to the LRAMVA on the assumption that lost revenues were lost evenly and consistently throughout the year in 2013.

- a) Please explain this statement and approach more fully.
- b) Please discuss CND's views on applying a half year rule to CDM savings in 2013 from 2013 CDM programs.

VECC-4

Ref: Application, Page 21 Table 9 Detailed Calculation of Lost Revenue

- a) Please confirm that the kW savings values reported for the Demand Response 3 program are contracted values and not actual demand reductions in each year.
- b) Does CND have any record as to how much actual demand reduction was achieved in each year due to the Demand Response 3 program? If so, how much was the actual demand reduction in each year and was the demand reduction coincident with the peak interval used to establish the customers' billing demands?

Z-Factor Claim

VECC-5

Ref: Application, Page 24

Preamble: CND is applying for recovery of a total Z-Factor claim of \$497,314 including carrying charges of \$9,520.

- a) Please confirm that all regular payroll costs and the associated truck costs are deducted from the total cost claim.
- b) Please confirm all of the costs in the Z-Factor claim were incurred in 2013.
- c) Please confirm CND followed its corporate policies regarding employee allowances for meals and accommodations.

VECC-6

Ref: Application, Page 25

Preamble: CND indicates restoration costs incurred by CND staff during CND's regular work days (Monday Dec 23, the morning of Tuesday Dec 24, Friday Dec 27, 2013 and certain days in the following week) have not been included in the claim.

- a) Please provide the actual days in the following week that have not been included in the claim.
- b) Please explain why work on the afternoon of Tuesday December 24, 2013 has been included in the claim and provide the \$ amount.
- c) Please provide the total number of hours and total \$ amount of the regular hours not included in the claim.

VECC-7

Ref: Page 36 Table 17 Total Subcontractor Costs

- a) For each of the companies listed in Table 17, please provide a further breakdown of costs into the categories of labour, materials, accommodations, meals, truck and other (provide explanation).

VECC-8

Ref: Page 37 Table 18 Material Costs

- a) Please confirm the materials acquired were at normal rates from regular suppliers.
- b) If not, please explain and provide a breakdown and explanation of the premium paid.

VECC-9

Ref: Page 33 Table 14 Total Overtime Labour and Vehicles

Preamble: CND indicates \$15,105 related to overtime for supervisory staff is included in the overtime hours and costs in Table 14.

- a) Please confirm the employee group for supervisory staff.
- b) Please provide CND's policies regarding non-union and management over time and include any written policies.
- a) Please discuss how supervisory staff overtime was treated in the past 3 years.

VECC-10

Ref: Page 36, Table 17 Total Subcontractor Costs

Preamble: CND indicates subcontractors charged emergency overtime rates and Statutory Holiday rates based on existing or previously established rates for both workers and equipment.

- a) Please compare emergency overtime rates to Statutory Holiday rates for each applicable company.
- b) Please discuss how existing and previously established rates have been determined and identify the companies with existing and previously established rates.
- c) For each of the companies listed in Table 17 please provide their overtime rate (i.e. time and a half, double time, etc.)
- d) Please discuss if CND paid any other premiums to the companies in Table 17 and provide details.
- e) Please list the companies in Table 17 that have existing contracts in place with CND to provide services.
- f) Please discuss if overtime rates were charged by subcontractors for work undertaken on Monday December 23, 2013 and/or December 27-31, 2013 and

provide the value of this work.

VECC-11

- a) Please provide CND's tree trimming cycle.
- b) Please provide CND's vegetation management budget and actuals for the years 2010 to 2014 and explain any variances greater than 10%.