

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 Alectra Utilities Corporation to the Ontario Energy Board (“OEB”) for an Order or Orders approving or fixing just and reasonable rates and other service charges for the distribution of electricity as of January 1, 2018.

**INTERROGATORIES
TO ALECTRA UTILITIES CORPORATION (“ALECTRA”)
FROM THE CITY OF HAMILTON (“COH”)**

Horizon Rate Zone

HRZ-COH- 1

Background:

In EB-2015-0075, the then-Horizon Utilities Corporation (“HUC”) sought approval for, among other things, an update to the Load Profile for the street lighting rate class. The application for that relief was based, in part, on HUC’s stated desire to “incorporate the change in forecast consumption levels and load profiles as a result of the City’s LED conversion program.” HUC stated that it considered the update important in that it allowed the COH to realize the benefits of its LED conversion program on a timely basis.

The OEB, in its Decision and Order dated December 10, 2015, denied the request for that relief on the basis that “Until data that is more accurate is available for all classes, Horizon must continue to use the existing load profiles for the purpose of its cost allocation model.”

Interrogatories:

- (a) Has Alectra obtained more accurate Load Profile data for all rate classes?
- (b) If it has not done so, why has it not done so?
- (c) If it has obtained more accurate Load Profile data for all rate classes, why has the Load Profile for those classes, including the street lighting class, not been updated?

HRZ-COH- 2

Background:

The COH has continued its LED conversion program referred to in EB-2015-0075.

Interrogatories:

- (a) Do the rates for the street lighting class which Alectra proposes in this application give full effect to the continuing LED conversion program?
- (b) If not, why not?

HRZ-COH- 3

Background:

The COH's LED conversion program is consistent with the Ontario government's policy on energy conservation, and with the OEB's stated intention to include technological developments in its considerations.

Interrogatories:

- (a) In light of the Ontario government's policies on energy conservation and the OEB's stated intention, does Alectra believe that it should be giving full effect to the COH's LED conversion program?
- (b) If not, why not?

HRZ-COH- 4

Interrogatories:

- (a) Has Alectra considered moving the LED-converted lights from an unmetered to a metered rate class?
- (b) If not, why not?
- (c) Would giving full effect to the COH's LED conversion program require moving the CED-converted lights from an unmetered rate class to a metered rate class?
- (d) If not, why not?

HRZ-COH- 5

Interrogatories:

- (a) Does Alectra agree that the street lighting class should receive, on a timely basis, the benefit in rates of its LED conversion program, whether as a result of changes to the Load Profile or the change from unmetered to metered rate classes, or both?
- (b) If not, why not?

HRZ-COH- 6

Interrogatories:

- (a) Please estimate the annual rate impact for the years 2018 and 2019 for the street lighting class if the load profile were updated to include the effect of the current status of the LED conversion?
- (b) Please estimate the annual rate impact for the street lighting class for the years 2018 and 2019 if the LED-converted lights were moved from an unmetered rate class to the appropriate metered rate class?

HRZ-COH- 7

Background:

In its Decision in EB-2015-0075, the OEB implemented the street lighting adjustment factor (“SLAF”).

Interrogatories:

- (a) Does the SLAF need to be adjusted to reflect the effect of the current status of the COH’s LED conversion program?
- (b) If not, why not?
- (c) If so, what would be the effect on annual rates for the street lighting rate class for 2018 and 2019?