



**VIA RESS AND COURIER**

February 5, 2009

Ms. Kirsten Walli  
Board Secretary  
P.O. Box 2319  
Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto, Ontario M4P 1E4

Dear Ms. Walli:

Re: AMPCO Interrogatories  
2009 Electricity Distribution Rates: Bluewater Power Distribution Corp  
Board File No. EB-2008-0221

Attached please find AMPCO's interrogatories on the above application. AMPCO consulted with Canadian Manufacturers and Exporters in the preparation of these interrogatories to avoid duplication.

Please contact Christine Dade at 416-938-5143 if you have any questions or require any further information.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Adam White", with a stylized flourish at the end.

Adam White

Copies to: Applicant and Intervenors (email)

**Association of Major Power Consumers in Ontario**  
[www.ampco.org](http://www.ampco.org)

372 Bay Street, Suite 1702  
Toronto, Ontario M5H 2W9

P. 416-260-0280  
F. 416-260-0442

**AMPCO Interrogatories  
2009 Electricity Distribution Rates  
Bluewater Power Distribution Corp.**

**EB-2008-0221**

**Interrogatory #1**

Exhibit 1, Tab 1, Schedule 3.1 Page 7 of 19 – paragraph 2

Bluewater has noted that they are going to seek to recover the net book value of the stranded assets from UBE.

- a) Has Bluewater approached UBE about this already?
- b) What is the likelihood of Bluewater being able to collect these monies?
- c) Would these assets come back into service if another industry moved in, or is UBE dismantling its facilities in total?

**Interrogatory #2**

Exhibit 1, Tab 1, Schedule 3.1 Page 11 of 19 Table 10

Bluewater notes in this table that the revenue requirement for the utility is only \$115,847 less than the original application.

- a) Table 6 – page 6 of 19 shows that the revenue shortfall of both UBE and Royal is \$513K. How does this shortfall in revenue net out to a difference in revenue requirement of \$115K?
- b) What about the avoided costs associated with this loss of revenue?

**Interrogatory #3**

Please provide the bill change for Bluewater's customers in 2009 from the current rates in 2008, without the rate riders.

**Interrogatory #4**

Has Bluewater considered the economical impact of the distribution rate increase to their GS 1000 – 4999 kW and Large Use customers when the rate riders are removed?

**Interrogatory #5**

Has Bluewater considered that UBE and Royal should be refunded their portion of the deferral/variance account when they close?

**Interrogatory #6**

- a) Has Bluewater calculated the amount that UBE and Royal have contributed to the credit in the deferral/variance account?
- b) During 2009, when UBE and Royal are planning to shut down, does Bluewater plan to accrue the rate rider back to the same deferral/variance account?