

#### VIA RESS AND COURIER

September 1, 2009

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

Dear Ms. Walli:

Re: Enersource Hydro Mississauga Inc.-Electricity Distribution Rate Change Application

Submission of AMPCO Interrogatories

Board File No. EB-2009-0193

Pursuant to the Board's Notice of Application and Written Hearing dated July 21, 2009, attached please find AMPCO's interrogatories in the above proceeding.

Sincerely yours,

**ORIGINAL SIGNED** 

Adam White

Copy to: Ms. Gia DeJulio

Director, Regulatory Affairs

Enersource Hydro Mississauga Inc.

**Association of Major Power Consumers in Ontario** 

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# AMPCO Interrogatories Enersource Hydro Mississauga Inc. Electricity Distribution Rate Application EB-2009-0193

# Interrogatory # 1

Reference: Tab B, Page 3, Paragraphs 8 & 9

<u>Preamble:</u> Enersource states that as a result of the misalignment between its fiscal year end (commencing January 1) and the effective date of rate orders (May 1), the actual rate of return does not match the approved rate of return.

<u>Interrogatory:</u> Please provide specific details and figures for Enersource's actual rate of return vs the approved rate of return for the 2009 and 2010 calendar years and rate years to further explain this point.

### Interrogatory # 2

Reference: Tab B, Pages 8 & 9

<u>Preamble:</u> Table 1 on Page 8 shows the 2009 3GIRM load forecast for the Large Use class as 1,720,956 kW. Table 2 on Page 9 shows the 2010 load forecast for the Large User as 1,847,558 kW, an increase of 126,602 kW.

Table 1 on Page 8 shows the 2009 3GIRM load forecast for the General Service 500kW - 4999 kW as 5,310,121 kW. Table 2 on Page 9 shows the 2010 load forecast for the large user as 5,107,408 kW, a decrease of 202,713 kW.

<u>Interrogatory:</u> Please explain the change in load forecast in 2010 and the derivation of this figure for the General Service 500kW – 4999kW and Large Use classes.

## Interrogatory #3

Reference: Tab B, Page 11, Paragraph 33, Cost Allocation

<u>Preamble:</u> Enersource submits that pursuant to the Settlement Agreement from its 2008 Cost of Service Rate Application, EB-2007-0706, all parties agreed on the current customer cost allocation ratios. All customer classes with revenue-to-cost ratios below 100% were increased to 91.5%. All customer classes with revenue-to-cost ratios above 100% were reduced to 111%. Four customer classes are overcontributing (GS<50kW, small commercial, GS>50kW, large user). Three customer classes are undercontributing (residential, GS>500kW, street lighting). As part of the EB-2007-0706 Settlement Agreement, AMPCO accepted the proposed 2008 revenue-to-cost ratios on the understanding that it may address in Enersource's 2009 IRM application the appropriateness of continuing those revenue to cost ratios after the 2008 test year.

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<u>Interrogatory:</u> Please provide an update on the steps Enersource has taken to improve the quality of the data and knowledge of the costs to serve each customer class, and what plans are underway to move revenue-to-cost ratios closer to one.