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November 12, 2009

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ms. Walli:

Re: EB-2009-0326 –Notice of a Proceeding to Determine A Just and Reasonable Rate to Recover the Costs Associated with Embedded Generators Having a Nameplate Capacity of 10 kW or Less – Interrogatories of the LPMA to Hydro One

Please find attached the interrogatories of the London Property Management Association (LPMA) to Hydro One in the above noted proceeding.

Sincerely,

Randy Aiken
Aiken & Associates

cc Susan Frank, Hydro One Networks

EB-2009-0326

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, (Schedule B);

AND IN THE MATTER OF a proceeding initiated by the Ontario Energy Board to determine and implement a distribution rate for embedded generators having as nameplate capacity of 10 kW of less.

INTERROGATORIES OF THE LONDON PROPERTY MANAGEMENT ASSOCIATION ("LPMA")
TO
HYDRO ONE NETWORKS INC.

Interrogatory # 1

Does Hydro One agree with the EDA proposal of a two-phase approach to the question of whether there should be a uniform rate for all LDCs or should LDCs have LDC-specific rates? In particular, does Hydro One support the Board initially setting a single provincial MicroFit generator customer charge followed at some point in the future with individual LDCs applying for LDC specific charges after they and the Board gain some experience with the generators? Please explain fully.

Interrogatory # 2

If the Board were to accept the two-phase approach recommended by the EDA, does Hydro One have any concerns with the approach suggested by the EDA to set the initial provincial wide rate? If so, please explain what these concerns are.

Interrogatory # 3

a) Please provide a general description of the costs that are excluded in the fixed charge credit provided to Unmetered Scattered Load (USL) customers.

b) Are the costs related to meter reading, billing and/or payment to MicroFit generators recovered in the fixed charge proposed by Hydro One? If not, why not?

Interrogatory # 4

The Hydro One proposal indicates that the only incremental facility required is a meter.

a) Would this meter be owned by the LDC or the generator customer?

b) Would the generator be required to pay an aid to construction for the meter? Please explain.

c) Is the meter the only incremental facility required by a MicroFit customer regardless of whether they are directly or indirectly connected? Please explain.

d) If the connection of a micro-generator does not use the same facilities as the main account of the customer, should there be a different rate class for those customers? Please explain.

Interrogatory # 5

a) When does Hydro One propose that any new rate approved by the Board should become effective?

b) How does Hydro One propose that the Board deal with revenues and costs associated with the MicroFit rate under the incentive regulation framework?

c) Does Hydro One propose that the rates approved by the Board in this proceeding (and/or the methodology to determine them) remain in place until the Board and LDCs gain experience with this class of customers and they are dealt with as part of the next generic review of cost allocation methodologies? If not, why not?

Interrogatory # 6

a) Does Hydro One believe that "smart" meters are required for all MicroFit generator customers, regardless of whether they are connected directly or indirectly and regardless of the type of generation being proved? Please explain.

b) Would the information provided by "smart" meters related to the amount and timing of generation be useful to Hydro One for distribution planning, cost allocation, or some other function? If yes, please explain.

c) Would the information provided by "smart" meters be useful for determining any benefits resulting from distributed generation associated with MicroFit generators such as losses and reduced capacity constraints? If not, why not?