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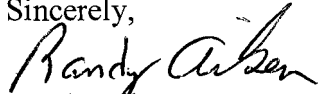
Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, Ontario, M4P 1E4

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 EDA

Please find attached the interrogatories of the London Property Management Association (LPMA) to the Electricity Distributors Association (EDA) in the above noted proceeding.

Sincerely,



Randy Aiken
Aiken & Associates

cc Maurice Tucci, Electricity Distributors Association

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 or less.

INTERROGATORIES OF THE LONDON PROPERTY MANAGEMENT
ASSOCIATION ("LPMA")
TO
ELECTRICITY DISTRIBUTORS ASSOCIATION

Interrogatory # 1

Does the EDA agree with the Hydro One proposal of using a fixed charge, being equivalent to the fixed charge credit provided to Unmetered Scattered Load (USL) customers? Please explain fully.

Interrogatory # 2

If the Board were to accept the approach recommended by Hydro One, does the EDA believe that two-phase approach should still be used? If yes, please explain why.

Interrogatory # 3

a) The EDA has proposed the inclusion of a number of cost items to be recovered through the MicroFit generator customer charge. Given that some of the assets used by the MicroFit generator customer are currently allocated to the residential and GS < 50 kW customer classes, should there be a reduction in the costs allocated to these customer classes? If not, why not?

b) If the Board were to accept the EDA proposal, should there be a credit (either to the load customer or to the generator customer) for the shared facilities/assets used by the load customer and the generator customer? If not, why not?

Interrogatory # 4

The EDA proposal indicates that the generator will be purchased by the generator.

- a) Please clarify whether the meter would be owned by the LDC or the generator customer.
- b) Would the meter be owned by the LDC and could 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) How does the EDA propose that the Board deal with revenues and costs associated with the MicroFit rate under the incentive regulation framework?
- b) Does the EDA 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?
- c) If a distributor is under incentive regulation, or files a cost of service application without an allocation of costs to the new MicroFit generator rate class (because of insufficient information), does the EDA agree that all revenues collected through the charge(s) to these MicroFit customers should be recorded in a deferral account the rebate to customers in the future? If not, please explain why not especially in light of the fact that any costs associated with the MicroFit customers would be allocated to other customer classes until a generic cost allocation study that incorporates such a class can be completed.

Interrogatory # 6

- a) Does the EDA 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 the EDA members 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?

Interrogatory # 7

The EDA proposal calls for the calculation of a province wide charge based on the calculation steps provided in the evidence.

a) Why cannot individual distributors calculate their customer-weighted average for cost components 1 to 12 shown and sum the 12 individual figures to arrive at their own utility-specific customer charge?

b) The averaging of the cost components over all provincial distributors would result in revenues in excess of costs for some distributors and costs in excess of revenues for others. Does the EDA believe this is appropriate and acceptable?

c) Please compare the 12 cost components proposed by the EDA for recovery through the MicroFit generator rate monthly charge with the cost categories that would be reflected in the Hydro One proposal (i.e. the cost categories that are reflected in the USL fixed charge credit.