

November 12, 2009

RE: EB-2009-0326 INTERROGATORIES FROM ALASI to EDA

Interrogatory # 1

Reference: EDA_EVD_20091105 Attachment – Load Dispatching

1. A) What specific, if any, increase in supervision and engineering might be required for FIT contracted micro embedded generation facilities as compared to Net Metered EG facilities?
1. B) Does the ESA's role in inspecting and qualifying an EG facility not suffice in ensuring a safe EG facility for connection to your members distribution networks and therefore results in additional costs to your members and if so please identify and explain these costs?
1. C) What are the estimated costs and additionally the variance in costs among your membership in regard to Load dispatching as a result of the connection of an embedded generation facility under FIT versus the similar facilities under Net Metering?

Interrogatory # 2

Reference: EDA_EVD_20091105 Attachment – Customer Premises; Operation and Labour & Materials and Expenses

2. A) Can you identify scenarios under which labour would need to be dispatched specifically to an EG facility beyond the dispatch of labour to a community as the result of a more general system anomaly?
2. B) What are the incremental costs of islanding the EG facility when the labour force has already been dispatched to that community?
2. C) What materials and material costs do your members foresee requiring in the service of a micro embedded generator and how do these materials and costs differ from those required by and for a Net Meter EG facility, and do these costs vary across your membership?

Reference: EDA_EVD_20091105 Attachment – Maintenance of Meters

Interrogatory # 3

3. A) Given that the OPA FIT rules state the LDC shall own any meter associated with the microFIT Project, why should an EG customer purchase the meter and or pay to replace the meter that is the property of the LDC?
3. B) What are the variances in meter costs among your membership?
3. C) What is the expected useful life of the meters to be employed for EG facilities and if these vary across your membership please explain and provide costs and technical specifications for each.

Interrogatory # 4

Reference: EDA_EVD_20091105 Attachment – Meter Reading

- 4. A) What are the incremental costs to your members of recording the metered data from a second meter at a location at which they are already in attendance?
- 4. B) What is the variance in costs for meter reading activities among your membership and why does this variance exist?

Interrogatory # 5

Reference: EDA_EVD_20091105 Attachment – Customer Billing

- 5. A) While we appreciate that some of your members may have previously invested in billing and customer management systems and software that are either at capacity or inflexible in their ability to add and or capture additional items without additional investment, on what basis should your members customer billing management system investment costs be borne by EG customers alone rather than by their entire customer base?
- 5. B) Where any of your members are unable to cost effectively create and manage customer accounts for EG customers under FIT Contracts, would those members be amenable to having other Ontario LDC's or private third parties provide those services if it were permitted by the OPA and the OEB?

Interrogatory # 6

Reference: EDA_EVD_20091105 Attachment – Amortization Expense – General Plant Assigned to Meters

- 6. A) What is the amortization period assigned to meters that will be deployed for EG facilities and if this varies across your members please provide the minimum and maximum?
- 6. B) The FIT Rules state that the LDC shall Own the meters, and therefore why should an EG customer purchase the meter on behalf of the LDC?

Interrogatory # 7

Reference: EDA_EVD_20091105 Attachment – Admin & General

7. A) In that a FIT contracted micro EG facility will sell 100% of its generated output to the OPA, and the OPA will subsequently sell that electricity to the LDC, who in turn will sell that electricity to the associated load customer, what is the total cost per kWh that is actually incurred by the LDC in the resale of the micro EG facility generated electricity to the associated load customer and what is the total “found revenue” or undispersed cost in this regard?

7. B) How do these additional revenues that have no related incurred cost compare to your members expectations of administration and staffing expense that will be incurred in relation to Micro EG facilities both in the short term and after the microFIT EG processes and procedures have improved in the future?

Interrogatory # 8

Reference: EDA_EVD_20091105 Attachment – Allocated PILs, Allocated Debt Return, &, Allocated Equity Return

8. A) What portion of these expenses cannot be applied under the resale of the Micro EG generated electricity back to the Associated Load Customer, and why?

Interrogatory # 9

If a settlement facility and mechanism is provided by the OEB that ensures that your members remain whole in recovering any and all actual costs incurred in relation to microFIT EG facilities, would your members have any objections or concerns regarding the facility or mechanism selected by the OEB?