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Barristers and Solicitors

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November 19, 2009

Via Email and Courier

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
27th Floor
2300 Yonge Street
Toronto, ON M5P 1E4

Dear Ms. Walli:

**Re: Information Requests of Brant County Power Inc. for Brantford Power Inc.
Board File Number EB-2009-0063**

Please find enclosed the Information Requests of Brant County Power Inc. for Brantford Power Inc. A copy of this will be filed on the Board's RESS System.

If there are any questions, please feel free to contact the undersigned at your earliest convenience.

Yours very truly,

AIRD & BERLIS LLP



Scott Stoll

SS/br
Encl.

cc: James Sidlofsky
All Intervenors
Christie Clark
Bruce Noble

6005900.1

**INTERROGATORIES
OF
BRANT COUNTY POWER INC.**

I.R. # 1 – Load Forecasts

Reference:

- Dec. 20, 2007 Filing
 - Exhibit 3, Tab 2, Schedule 2, Pg. 5 of 5, Table 3.2.2-4
 - Exhibit 2, Tab 4, schedule 1, pg. 4 of 4

The “Test Year Normalized Forecast” (2008) indicates GS > 50 kW class has a demand (kW) forecast of 1,635,606. It is understood that this value includes all GS > 50 kW customers including all Brant County Power meter points (three) and the other new large use customer.

- a) Please fill in the following chart for (all years) reconciling to table 3.2.2-4. If load forecasts for the other large use customer are deemed confidential, please fill in remaining areas and indicate such.

	Historical Actual Normalized (2006)	Bridge Year Normalized (2007)	Annual Change (kW)	Annual Change (%)	Test Year Normalized (2008)	Annual Change (kW)	Annual Change (%)
BCP – Powerline							
BCP – Colborne West							
BCP – Colborne East							
Other L/U							
Remaining GS > 50 kW							
Total							

- b) Please fill in the following chart reconciling to total Network / Connection forecast of \$10,055,737 found in exhibit 2, tab 4, schedule 1, pg. 4 of 4.

	Billing Determinant (kWh/ kW)	Wholesale Rate	Network & Connection Expense Forecast in \$ (2008)	Billing Determinant (kWh / kW)	Retail Rate	Network & Connection Revenue Forecast in \$ (2008)
Residential						
GS < 50 kW						
GS > 50 kW						
Street Light						
Sentinel Light						
Unmetered / Scattered Loads						
Total						

I.R. #2 – Load Forecasts

Reference: Exhibit 3, Tab 2, Schedule 2, Page 1 of 5, Table 3.2.2-1

Question:

- a) Please specify, for each Brant County Power Inc.'s meter points, the first year and the value forecasted, kW and kWh, for such point.

Point	Year	Amount
BCP - Powerline Road		
BCP- Colborne West		
BCP - Colborne East		

- b) Please specify the amount included in the forecast, kW and kWh, for each subsequent year available.

Point	2005	2006	2007	2008
Powerline Road				
Colborne West				
Colborne East				
Total Forecasted				

I.R. #3 – Load Forecast

Reference: Response to Board Staff Interrogatory 10.1 (b)

Question:

- a) Please confirm the annual yearly energy delivered figures provided in Table 10.1.b were included in the 2008 forecast?
- (i) If yes, please specify the forecasted total yearly energy delivered to: (1) the GS>50kW customer class, (2) Brant County Power; and (3) remaining GS>50kW customers.
- (ii) If no, please specify the forecasted total yearly energy delivered to: (1) the GS>50kW customer class, (2) Brant County Power; and (3) remaining GS>50kW customers.

I.R. # 4 – Cost Allocation Methodology

Reference

- Board Staff IR Response May 15, 2008 – IR # 10.3 a)
- Dec. 20, 2007 Filing – Exhibit 4, Tab 2, Schedule 1

USoA Account	Description	Expense Type	Approved Amount (2008 Test) (Ref b)	Embedded Distributor Amount (Ref a)	Allocation %
5405	Supervision	G&A	\$0	\$494	N/A
5410	Community Relations – Sundry	G&A	\$125,171	\$1,145	0.9%
5420	Community Safety Program	G&A	\$13,920	\$362	2.6%
5515	Advertising Expense	G&A	\$0	-\$3	N/A
5605	Executive Salaries & Expenses	G&A	\$429,070	\$4,060	0.9%
5610	Management Salaries & Expenses	G&A	\$723,218	\$3,226	0.4%
5615	General Admin Salaries & Expenses	G&A	\$726,087	\$9,181	1.3%
5620	Office Supplies & Expenses	G&A	\$52,654	\$3,928	7.5%
5630	Outside Services Employed	G&A	\$179,500	\$694	0.4%
5635	Property Insurance	G&A	\$0	\$387	N/A
5645	Employee Pensions & Benefits	G&A	\$110,367	\$2,174	2.0%
5650	Franchise Requirements	G&A	\$53,871	\$1,125	2.1%
5655	Regulatory Expense	G&A	\$215,000	\$2,179	1.0%
5660	General Advertising Expense	G&A	\$26,000	\$353	1.4%
5665	Misc. General Expenses	G&A	\$187,617	\$12,972	6.9%
5670	Rent	G&A	\$0	\$4,676	N/A
5675	Maintenance of General Plant	G&A	\$0	\$539	N/A
5680	Electrical Safety Authority Fees	G&A	\$20,000	\$78	0.4%
6105	Taxes Other Than Income Taxes	G&A	\$12,298	\$3,782	30.8%
6205	Donations	G&A	N/A	\$81	N/A
5315	Customer Billing	Cust. Related	\$509,848	\$1	0.0%
5705	Amort. Exp – Property, Plant & Equip	Dep'n & Amort	\$3,027,657	\$55,005	1.8%
5710	Amort. Of Limited Term Elec. Plant	Dep'n & Amort	\$0	\$2,395	N/A
5005	Operation Supervision & Engineering	Distribution	\$266,919	\$3,551	1.3%
5010	Load Dispatching	Distribution	\$17,887	\$205	1.1%
5012	Station Buildings & Fixtures Expense	Distribution	\$39,832	\$2,757	6.9%
5014	Trans. Station Equip. – Operation Labour	Distribution	\$6,778	\$200	3.0%
5015	Trans. Stat. Equip. – Oper. Supplies & Expense	Distribution	\$55,950	\$59	0.1%
5020	Overhead Dist. Lines & Feeder – Ops. Labour	Distribution	\$3,298	\$24	0.7%
5025	O/H Dist. Lines & Feeder – Ops. Sup. & Exp.	Distribution	\$15,081	\$531	3.5%
5040	Underground Dist. Line & Feed – Ops. Labour	Distribution	\$1,139	\$31	2.7%
5045	U/G Dist. Lines & Feeders – Ops. Supp. & Exp.	Distribution	\$20,669	\$150	0.7%
5085	Misc. Distribution Expense	Distribution	\$129,239	\$3,464	2.7%
5105	Maintenance Supervision & Engineering	Distribution	\$306,914	\$9,075	3.0%
5110	Maintenance Build. & Fix. – Dist. Stations	Distribution	\$4,337	\$75	1.7%
5114	Maintenance DS Equipment	Distribution	\$17,703	\$1,042	5.9%
5120	Maintenance Poles, Towers & Fixtures	Distribution	\$167,336	\$7,225	4.3%
5125	Maintenance of O/H Conductor & Devices	Distribution	\$212,429	\$11,833	5.6%
5135	O/H Dist. Lines & Feeder – Right of Way	Distribution	\$364,402	\$12,595	3.5%
5145	Maintenance of U/G Conduit	Distribution	\$72,896	\$889	1.2%
5150	Maintenance of U/G Conductors & Devices	Distribution	\$121,982	\$2,579	2.1%
6110	Income Taxes	PILS	\$1,889,507	\$38,956	2.1%
6005	Interest on Long-Term Debt	Interest	\$2,098,892	\$39,815	1.9%
Total				243,890	

I.R. #4 - Cost Allocation (cont'd)

Board Staff noted Brantford had indicated in the Informational Filing that the revenue requirement was approximately \$300,000 for the embedded distributor. Brantford stated that it wanted to ensure customers are treated fairly.

Question:

- a) Please explain the basis for the estimate of \$300,000 per year statement, as opposed to the total of \$243,890 which results from a summation of the table.
- b) Please explain the basis upon which the allocation to the embedded distributor class was made for each account included in the table.
- c) Are there any underground assets that service Brant County Power? If so, please describe the assets.
- d) The allocation for Account 5645 is approximately 2%. The allocated costs for Accounts 5605 (0.9%), 5610 (0.4%) and 5615 (1.3%) are much lower. Please explain the rationale and reconcile the variation in the stated percentages.
- e) Please explain why Accounts 5405, 5635, 5670, 5675 and 5710 each have a total balance of \$0 yet significant costs are allocated to the embedded distributor class.
- f) Please explain why the allocation of account 6105 to the embedded distributor class exceeds 30%.
- g) What criteria or factors does Brantford use to determine the "fairness" of a proposed rate. Are there any specific revenue-to-cost ratios? If so, please specify.

I.R. #5 – Regulatory Assets

- a) Confirm if the electricity supplied to Brant County Power Inc. by Brantford is included in the calculation of the billing determinants for Brantford's regulatory assets? If so, please provide a summary of the amounts that were included and for which meter points.