

Brant County Power Inc. Motion EB-2009-0063

Board Staff Interrogatories to Brant County Power Inc.

As identified in the Procedural Order No. 4 issued on October 5, 2009, the Board has determined to proceed by way of written hearing at this point in time and has ordered written interrogatories and responses in the Motion to Review and Vary the Brantford Power Inc. Decision EB-2007-0698 by Brant County Power Inc. The following are Board Staff's interrogatories.

1 GENERAL

Issue 1.1 Embedded distributor

1 Ref: Exhibit(s) Distribution System Code Motion Record of Brantford Power Inc.

The Distribution System Code defines embedded distributors as "a distributor who is not a wholesale market participant and that is provided electricity by a host distributor."
Does BCPI settle for the cost of power with anyone other than the IESO?

2 VOLUMES

Issue 2.1 Brant County Forecast Volumes for 2008

2 Ref: Exhibit(s) Motion Record of Brant County Power Inc.

BCPI state that the BPI forecast for 2008 is understated.

- a) On what basis was this statement made?
- b) What was BCPI's forecast for 2008?
- c) On what basis was BCPI's forecast developed?

3 VOLUMES AND LOSS FACTORS

Issue 3.1 Volumes

3 Ref: Exhibit(s) Motion Record of Brant County Power Inc.

The Motion Record states that BCP has no rate classification for BCPI, given the General Service 50 kW to 4,999 kW ("GS>50kW") Tariff definition. Please provide BCPI's average annual kW for 2004 to 2008.

4 DEFERRAL AND VARIANCE ACCOUNTS

Issue 4.1 Appropriateness of any DVA charges to BCPI from BPI

4 Ref: Exhibit(s) EB-2007-0698, Approved Rate Schedules

Board staff is aware that the clearing of the deferral accounts resulting in the credits on the rate schedule was over an 8 month period and are no longer in place. However, conceptually staff is interested in whether any deferral and variance accounts should be collected from another utility receiving only delivery service from an electricity distributor. Please state the cost causality and if there is no cost causality the state reasons for making a levy.

5 RATE IMPACTS

Issue 5.1 Rebalanced Rates

5 Ref: Exhibit(s) Motion Record of Brant County Power Inc.

BCPI is claiming that the GS>50 is an inappropriate rate under which they are served. Board staff is interested in the how BCPI will implement new cost levels into their rates if the Board finds a change from the current situation for BCPI is warranted.

- a) In what account would the new charges be collected?
- b) When will BCPI adjust their rates to reflect the new costs?

6 IMPLEMENTATION

Issue 6.1 Implementing any new rates

It is possible that new rates could result from this Motion. Board staff is interested in finding an appropriate means of implementing the Board's findings if rates change. The

current rates for both utilities are final. BPI has been charging BCPI for service under GS >50 to BCPI since 2008.

Currently, BCPI has ceased making payments and state that they will make the required payments, if any, as directed by the Board.

If the Board were to find that the changes to the existing rates are appropriate, does BCPI have a view as to whether these changes should be applied prospectively only or retroactively as well? Please state specifically how BCPI would propose to effect these changes were they to be required.

Issue 6.2 Implementing the RTS finding

Upon resolution of the issues around the RTS billing error, does BCPI have a view on the methodology for settling the amount?