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BY E-MAIL

December 14, 2009

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Lakeland Power Distribution Limited
2010 IRM3 Distribution Rate Application
Board Staff Interrogatories
Board File No. EB-2009-0234**

In accordance with the Notice of Application and Written Hearing, please find attached Board Staff Interrogatories in the above proceeding. Please forward the following to Lakeland Power Distribution Limited and to all other registered parties to this proceeding.

In addition please advise Lakeland Power Distribution Limited that responses to interrogatories are due by January 7, 2010

Yours truly,

Original Signed By

Martin Benum
Advisor – Applications & Regulatory Audit

Encl.

Board Staff Interrogatories

2010 IRM3 Electricity Distribution Rates Lakeland Power Distribution Limited (“Lakeland”) EB-2009-0234

1. Ref: 2010 IRM Deferral Variance Account 2006 EDR LV

In the 2006 EDR application Lakeland included \$655,386 in LV Allocation as a Rate Adder. In 2007 and 2008 the price cap adjustment (GDP-IPI – X) was 0.9% and 1.1% respectively. This would have increased the 2007 and 2008 LV Allocation to \$661,284 and \$668,559 respectively. In the 2010 IRM Deferral Variance Account Workform Lakeland has reported -\$8,026, -\$20,741 and \$11,828 for 2006, 2007 and 2008 additions for USoA 1550 LV Variance account.

DVAWF			2006 EDR	
	Transactions (additions) during 2006/7/8, excluding interest and adjustments	Transactions (reductions) during 2006/7/8, excluding interest and adjustments	7-2 ALLOCATION - LV-Wheeling Cell L120	(GDP-IPI) - X
2006	-\$ 8,026	\$ -	\$ 655,386	0.0%
2007	-\$ 20,741	\$ -	\$ 661,284	0.9%
2008	\$ 11,828	\$ -	\$ 668,559	1.1%

- a) Please confirm that Lakeland has applied the 2006 EDR LV Allocation against Hydro One LV costs and that the balance shown in the Deferral Variance Account workform are net of the LV allocation and correct.

If LV Allocation not applied or Account 1550 not correct please provide an explanation in respect to the accounting for the LV

2. Ref: 2010 IRM Deferral Variance Account 1588 -Power

The 2008 ending balances reported in the 2010 IRM Deferral Variance Account workform prepared by Lakeland shows the split for account 1588 – Power and Global Adjustment. On October 15, 2009 the Board issued “Regulatory Audit and Accounting Bulletin 200901” which clarified the accounting rules for reporting the 1558 – Global Adjustment sub-account.

Account Description	Account Number	Total Claim
		I = C + D+ E + F + G + H
RSVA - Power (Excluding Global Adjustment)	1588	523,174
RSVA - Power (Global Adjustment Sub-account)		(50,129)

- a) Has Lakeland reviewed the Regulatory Audit & Accounting Bulletin 200901 dated October 15, 2009, and ensured that it has accounted for its account 1588 and sub-account Global Adjustment in accordance with this Bulletin?
- b) Has Lakeland made adjustments subsequent to filing the 2010 IRM3 application and need to re-file an updated 2010 IRM Deferral Variance Account workform?

3. Ref: 2010 IRM Deferral Variance Account 1588 – Global Adjustment

On November 13, 2009 Board Staff prepared a submission in the Enersource EB-2009-0193 2010 IRM3 Application. The following is an excerpt from the submission in respect to Board staff concerns with the current proposal for handling the disposition of the USoA 1588 – Global Adjustment.

The EDDVAR Report as well as the Board’s Decision in EB-2009-0113 adopted an allocation of the GA sub-account balance based on kWh for non RPP customers by rate class. Traditionally this allocation would then be combined with all other allocated variance account balances by rate class. The combined balance by rate class would then be divided by the volumetric billing determinants (kWh or kW) from the most recent audited year end or Board approved forecast, if available. This process hence spreads the recovery or refund of allocated account balances to all customers in the affected rate class.

This method was factored on two premises; a) that the recovery/refund of a variance unique to a subset of customers within a rate class would not be unfair to the rate class as a whole and b) that the distributors’ billing systems would not be able to bill a subset of customers within a rate class, without placing a significant burden to the distributor.

For these reason the Board’s original Deferral Variance Account workflow was modelled on this basis. However based on Enersource’s evidence, there could be material unfairness to RPP customers within the affected rate classes.

Therefore Board staff suggests that a separate rate rider be established to clear the GA sub-account balance to Non-RPP customers within rate classes.

What remains unclear to Board staff is whether Enersource’s billing system could accommodate that change within a reasonable timeframe.”

Board staff would like to poll Lakeland on the above issue.

- a) Board staff is proposing that a separate disposition rate rider be applied prospectively to Non-RPP customers for 1588 – Global Adjustment. Does Lakeland agree that this proposal would be fair to all customers? Why or why not?
- b) If the Board were to order Lakeland to provide such a rate rider, would Lakeland’s billing system be capable of billing non-RPP the separate rate rider? What complications, if any, would Lakeland see with this rate rider?
- c) If Lakeland were to be unable to bill in this fashion what would Lakeland consider proposing in the alternative?

4. Ref: 2010 IRM Deferral Variance Billing Determinants

Below are the billing determinants identified on Sheet “B1.3 Rate Class And Bill Det” of the workflow.

Rate Class	2008		
	Customers or Connection	Billed kWh	Billed kW
	A	B	C
Residential	7,605	81,234,268	
General Service Less Than 50 kW	1,543	44,415,850	
General Service 50 to 4,999 kW	100	90,658,716	226,544
Unmetered Scattered Load	47	214,928	
Sentinel Lighting	45	38,404	111
Street Lighting	2,130	1,876,475	5,123

- a) Please identify if these values are from the Lakeland 2009 Cost of Service Application or 2008 RRR reported values.
- b) If the above are from the 2009 CoS application please provide reference to location in the application.
- c) If the above are from the 2008 RRR reported values, please explain why Lakeland has not used the 2009 CoS values.

5. Ref: 2010 IRM Deferral Variance Billing Determinants

Below are the Billed kWh for Non-RPP customers identified on Sheet “B1.3 Rate Class And Bill Det” of the workform.

Rate Class	Billed kWh for Non-RPP customers D
Residential	9,001,961
General Service Less Than 50 kW	7,849,630
General Service 50 to 4,999 kW	90,658,716
Unmetered Scattered Load	6,773
Sentinel Lighting	1,821
Street Lighting	413,939

- a) Please identify if these values estimated values or actual values and specify the applicable period.
- b) If the above values are estimated please explain why Lakeland is unable to determine actual.
- c) As discussed in question 12 above Board staff have proposed a non-RPP customer rate rider for disposition of the 1588 – Global adjustment. If accepted would Lakeland support using the numbers above as the most reasonable denominator to be used for rate determination.
- d) If Lakeland were to establish a separate rate rider to dispose of the balance of the 1588 – Global adjustment sub-account, does NPEI believe that the rider be applied to customers in the MUSH sector? If not, would NPEI have the billing capability to exclude customers in the MUSH sector if a separate rate rider were to apply for the disposition of the 1588 – Global adjustment sub-account?

Ref: 2010 IRM Deferral Variance Total Claim

Below are the Total Claim values for the EDDVAR Group One Deferral Accounts.

Regulatory Assets - Continuity Schedule Final

Account Description	Account Number	Total Claim
		I = C + D + E + F + G + H
LV Variance Account	1550	10,870
RSVA - Wholesale Market Service Charge	1580	(130,788)
RSVA - Retail Transmission Network Charge	1584	(232,102)
RSVA - Retail Transmission Connection Charge	1586	(273,524)
RSVA - Power (Excluding Global Adjustment)	1588	523,174
RSVA - Power (Global Adjustment Sub-account)		(50,129)
Recovery of Regulatory Asset Balances	1590	22,274
Disposition and recovery of Regulatory Balances Account	1595	0
Total		(130,225)

- a) Please complete the amended Deferral Variance Account Workform V4 as found on the Board's website under the 2010 Electricity Distribution Rates update December 7, 2009. Note that Board staff can assist in converting your most recent model (either the one filed with your application or a more recent version if available). Please contact your case manager to assist you if need be.
- b) Please reconcile final balance for disposition to the 2008 year end account balance reported in the RRR filing. Please identify source and reason for variances.
- c) Please confirm that Lakeland has complied with and applied correctly the Boards accounting policy and procedures for calculation of the final disposition balance. If Lakeland has used other practices in the calculation please explain where in the filing and why?

- d) Please confirm that Lakeland has used the simple interest calculation as required by the Board using the Boards prescribed interest rates. If Lakeland has used other calculations please explain where in the filing and why?
- e) Please confirm that Lakeland has complied with the requirement to apply recoveries to principal first as outlined in the 2006 Regulatory Assets Transactions document issued September 4, 2009 (included in the Updated IRM Deferral and Variance Account Work Form zip file). If Lakeland has not complied with this requirement please explain why not?

6. Ref. 2010 Supplemental Filing Module

On Sheet "B1.2 Removal of Rate Adders" Lakeland has entered the following adjustments to the 2009 Tariff Rates

Rate Class	Service Charge	Distribution	Distribution
	Rate Adders	Volumetric kWh	Volumetric kW
	D	Rate Adders	Rate Adders
		E	F
Residential	1.27	0.0035	0.0000
General Service Less Than 50 kW	2.45	0.0025	0.0000
General Service 50 to 4,999 kW	4.16	0.0000	0.8350
Unmetered Scattered Load	0.60	0.0028	0.0000
Sentinel Lighting	0.47	0.0000	2.6366
Street Lighting	0.52	0.0000	2.5378

- a) Please explain where these rate adders are found in your 2009 Cost of Service application.
- b) Please explain why these rate adders do not match the rate adders (primarily smart meter and low voltage) found in Lakelands 2010 Rate Generator.

7. Ref: Manager's Summary Page 6 Smart Meter Rate Adder.

Lakeland has applied for an increased Smart Meter Rate Adder from \$1.00 to \$2.00 per metered customer per month.

- a) Please explain how the value of \$2.00 was derived and provide calculation model to support this calculation.
- b) If a calculation model was not used, please complete the smart meter calculation model that can be provided to you through your applications case manager.

HST Interrogatory

8. Harmonized Sales Tax

It is possible that the PST and GST may be harmonized effective July 1, 2010. Unlike the GST, the PST is included as an OM&A expense and is also included in capital expenditures. If the GST and PST are harmonized, corporations would see a reduction in OM&A expenses and capital expenditures.

In the event that PST and GST are harmonized effective July 1, 2010:

- a). Would Lakeland agree to capture in a variance account the reductions in OM&A and capital expenditures?
- b). Are there other alternatives that the Board might consider to reflect the reductions in OM&A and capital expenditures if this bill is enacted?