

Board Staff Interrogatories

2010 IRM3 Electricity Distribution Rates Hydro Ottawa Ltd. ("Hydro Ottawa") EB-2009-0231

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

The 2008 ending balances reported in the 2010 IRM Deferral Variance Account workform prepared by Hydro Ottawa 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	8,848,077
RSVA - Power (Global Adjustment Sub-account)		8,635,047

- a) Has Hydro Ottawa 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 Hydro Ottawa made adjustments subsequent to filing the 2010 IRM3 application and need to re-file an updated 2010 IRM Deferral Variance Account workform?

2. 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 workform was modeled 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 Hydro Ottawa 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 Hydro Ottawa agree that this proposal would be fair to all customers? Why or why not?
- b) If the Board were to order Hydro Ottawa to provide such a rate rider, would Hydro Ottawa's billing system be capable of billing non-RPP the separate rate rider? What complications, if any, would Hydro Ottawa see with this rate rider?
- c) If Hydro Ottawa were to be unable to bill in this fashion what would Hydro Ottawa consider proposing in the alternative?

3. Ref: 2010 IRM Deferral Variance Billing Determinants

Below are the billing determinants identified on Sheet "B1.3 Rate Class And Bill Det" of the workform.

2008			
Rate Class	Billed Customers or	Billed kWh	Billed kW
	Connections		
	A	B	C
Residential	264,958	2,226,078,653	
General Service Less Than 50 kW	23,314	742,015,251	
General Service 50 to 1,499 kW	3,290	3,020,846,382	7,241,479
General Service 1,500 to 4,999 kW	66	845,347,506	1,764,993
Large Use	11	665,877,785	1,190,146
Unmetered Scattered Load	2,885	21,294,526	
Sentinel Lighting			
Street Lighting	50,971	37,459,213	112,373

- a) Please identify if these values are from the Hydro Ottawa 2008 Cost of Service Application or 2008 RRR reported values.
- b) If the above are from the 2008 CoS values, please explain why Hydro Ottawa has not used the 2008 RRR reported values.

4. 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 General Service Less Than 50 kW General Service 50 to 1,499 kW General Service 1,500 to 4,999 kW Large Use Unmetered Scattered Load Sentinel Lighting Street Lighting	

- 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 Hydro Ottawa is unable to determine actual.
- c) As discussed in one of the questions above Board staff have proposed a non-RPP customer rate rider for disposition of the 1588 – Global adjustment. If accepted would Hydro Ottawa support using the numbers above as the most reasonable denominator to be used for rate determination.
- d) If Hydro Ottawa were to establish a separate rate rider to dispose of the balance of the 1588 – Global adjustment sub-account, does Hydro Ottawa believe that the rider be applied to customers in the MUSH sector? If not, would Hydro Ottawa 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?

5. 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	354,511
RSVA - Wholesale Market Service Charge	1580	(5,715,881)
RSVA - Retail Transmission Network Charge	1584	(5,014,589)
RSVA - Retail Transmission Connection Charge	1586	(3,125,245)
RSVA - Power (Excluding Global Adjustment)	1588	8,848,077
RSVA - Power (Global Adjustment Sub-account)		8,635,047
Recovery of Regulatory Asset Balances	1590	630,327
Disposition and recovery of Regulatory Balances Account	1595	0
	Total	4,612,247

- 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 confirm if these are the final balances for disposition. If not the final balances please provide amended workform to support final balances for disposition.
- c) Please reconcile final balance for disposition to the 2008 year end account balance reported in the RRR filing. Please identify the source and reasons for variances.
- d) Please confirm that Hydro Ottawa has complied with and applied correctly the Boards accounting policy and procedures for calculation of the final

disposition balance. If Hydro Ottawa has used other practices in the calculation please explain where in the filing and why.

- e) Please confirm that Hydro Ottawa has used the simple interest calculation as required by the Board using the Boards prescribed interest rates. If Hydro Ottawa has used other calculations please explain where in the filing and why.
- f) Please confirm that Hydro Ottawa 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 Hydro Ottawa has not complied with this requirement please explain why not?

6. Ref: Supplemental Module - Z-Factor Tax Changes

Sheet "F1.1 Z-Factor Tax Changes" of the supplemental module shows Grossed-Up Tax Amount as \$9,716,305 while the 2009 3GIRM Supplementary Filing Module sheet "F1.1 Z-Factor Tax Changes" shows Grossed-Up Income Taxes as \$9,937,684.

- a) Please review and advise of correct amount.

HST Interrogatory

7. 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 Hydro Ottawa 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?

Lost Revenue Adjustment Mechanism

8. 2009 LRAM

Hydro Ottawa is seeking approval for recovery of \$235,563 related to the Lost Revenue Adjustment Mechanism (“LRAM”) for Ontario Power Authority (“OPA”) Conservation and Demand Management (“CDM”) programs it undertook in 2007.

- a) Please confirm the input assumptions used when calculating the LRAM claim for 2007 OPA CDM programs.