

Board Staff Interrogatories

2010 IRM2 Electricity Distribution Rates Fort Frances Power Corporation ("Fort Frances Power") EB-2009-0264

1. Ref: Manager's Summary and EDDVAR Report

On July 31, 2009 the Board issued its Report on Electricity Distributors' Deferral and Variance Account Review Initiative (EDDVAR). The report requires electricity distributors to determine the outstanding consolidated value of Group One accounts as at December 31, 2008 and determine whether or not the Board defined threshold value of +/- \$0.001/kwh had been exceeded. Fort Frances Power chose to request exemption from filing.

- a) Did Fort Frances Power complete an informal calculation of outstanding balances as at December 31, 2008 to determine position on threshold? If so please advise calculated value.
- b) The Board is currently reviewing the impact of significant growth in the balance of Account 1588 – Global Adjustment during the period January 1 to September 30, 2009. Currently no concrete direction has been determined for future disposition. The Board has added the request to disclose 1588 – Global Adjustment values in the model for information purposes only. If Fort Frances Power would like to consider completing the 2010 IRM Deferral Variance Account Workform, please complete and file the amended Deferral Variance Account Workform V4 as found on the Board's website under the 2010 Electricity Distribution Rates update December 7, 2009.
- c) If Fort Frances Power has completed a previous version of the 2010 IRM Deferral Variance Account Workform, please update to 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 any recent models and making model amendments. Please contact your case manager to assist you.
- d) If Fort Frances Power has completed the workform 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.
- e) If Fort Frances Power has completed the workform please confirm that Fort Frances Power has complied with and applied correctly the Boards accounting policy and procedures for calculation of the final disposition

balance. If Fort Frances Power has used other practices in the calculation please explain where in the filing and why.

- f) If Fort Frances Power has completed the workform please confirm that Fort Frances Power has used the simple interest calculation as required by the Board using the Boards prescribed interest rates. If Fort Frances Power has used other calculations please explain where in the filing and why.
- g) If Fort Frances Power has completed the workform please confirm that Fort Frances Power 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 Fort Frances Power has not complied with this requirement please explain why not?
- h) If Fort Frances Power has completed the workform please confirm whether the threshold balance of +/- \$0.001 per kWh is or is not exceeded.
- i) If Fort Frances Power has any concerns with respect to the disposition of deferral variance account balances, please explain in detail why the Board should not consider disposal at this time?

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

On October 15, 2009 the Board issued "Regulatory Audit and Accounting Bulletin 200901" which clarified the accounting rules for reporting the 1588 – Global Adjustment sub-account.

- a) Has Fort Frances Power 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?

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

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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 Fort Frances Power 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 Fort Frances Power agree that this proposal would be fair to all customers? Why or why not?
- b) If the Board were to order Fort Frances Power to provide such a rate rider, would Fort Frances Power's billing system be capable of billing non-RPP the separate rate rider? What complications, if any, would Fort Frances Power see with this rate rider?
- c) If Fort Frances Power were to be unable to bill in this fashion what would it consider proposing in the alternative?
- d) If Fort Frances Power were to establish a separate rate rider to dispose of the balance of the 1588 – Global adjustment sub-account, does Fort Frances Power believe that the rider be applied to customers in the MUSH sector? If not, would Fort Frances Power have the billing capability to

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exclude customers in the MUSH sector if a separate rate rider were to apply for the disposition of the 1588 – Global adjustment sub-account?

4. Ref: Rate Generator Sheet “C4.1 Curr Rates & Chgs General”

Sheet “C4.1 Curr Rates & Chgs General” of the Rate Generator does not match the General Service Less Than 50 kW rates as found on Fort Frances Power current Tariff sheet.

Rate Class

General Service Less Than 50 kW

Rate Description	Metric	Rate
Service Charge	\$	29.27
Distribution Volumetric Rate	\$/kWh	0.0065
Retail Transmission Rate – Network Service Rate	\$/kWh	0.0045
Retail Transmission Rate – Line and Transformation Connection Service Rate	\$/kWh	0.0016
Wholesale Market Service Rate	\$/kWh	0.0052
Rural Rate Protection Charge	\$/kWh	0.0013
Standard Supply Service – Administrative Charge (if applicable)	\$	0.25

- a) Please confirm that the rates as shown above from the filed 2010 IRM2 Rate Generator match Fort Frances Power current tariff sheet? If the rates do not match, please advise correct rates and request Board staff to adjust the filed Rate Generator.

5. Ref: Rate Generator Sheet “C4.1 Curr Rates & Chgs General”

Sheet “C4.1 Curr Rates & Chgs General” of the Rate Generator does not match the Unmetered Scattered Load rates as found on Fort Frances Power current Tariff sheet.

Rate Class

Unmetered Scattered Load

Rate Description	Metric	Rate
Service Charge (per connection)	\$	28.27
Distribution Volumetric Rate	\$/kWh	0.0065
Retail Transmission Rate – Network Service Rate	\$/kWh	0.0041
Retail Transmission Rate – Line and Transformation Connection Service Rate	\$/kWh	0.0014
Wholesale Market Service Rate	\$/kWh	0.0052
Rural Rate Protection Charge	\$/kWh	0.0013
Standard Supply Service – Administrative Charge (if applicable)	\$	0.25

- b) Please confirm that the rates as shown above from the filed 2010 IRM2 Rate Generator match Fort Frances Power current tariff

sheet? If the rates do not match, please advise correct rates and request Board staff to adjust the filed Rate Generator.

6. Retail Transmission Service Rates (RTSR)

Per Fort Frances Power Manager's Summary, the applicant has requested to not adjust the RTSR's in this application.

- a. Please provide a historical/pro forma month to month analysis showing the differences (monthly and cumulative) of revenue less expense related to the two RTSR transactions.
- b. Using the above please provide supporting justification proving neither Fort Frances Power nor its customers would be financially harmed by not changing the RTSR's in this application.

HST Interrogatory

7. Harmonized Sales Tax

It is possible that the PST and GST may be harmonized effective July 1, 2010.

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

- a. Would the Applicant agree to the establishment of a variance account to capture 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?