



***PUBLIC INTEREST ADVOCACY CENTRE***  
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March 26, 2010

**VIA MAIL AND EMAIL**

Ms. Kirsten Walli  
Board Secretary  
P.O. Box 2319  
2300 Yonge St.  
Toronto, ON  
M4P 1E4

Dear Ms. Walli

**Re: Vulnerable Energy Consumers Coalition (VECC)**  
**EB-2009-0408**  
**Great Lakes Power Transmission Inc. – Transmission Revenue**  
**Requirement Change**

Please find enclosed the interrogatories of the Vulnerable Energy Consumers Coalition (VECC) in the above-noted proceeding. We shall also be directing a copy of the same to the Applicant.

Yours truly,

Michael Buonaguro  
Counsel for VECC  
Encl.

## Great Lakes Power Transmission LP ("GLPT") 2010 Transmission Rate Application

Board File Number EB-2009-0408

### 2<sup>nd</sup> Round Interrogatories of the Vulnerable Energy Consumers' Coalition

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#### Question #18 Capital Projects in Service, 2007-2010

Reference: Ex 10/T2/S1 IR#3 a)

Preamble: In looking at this response, most projects appear to come in service near the end of each year. To quantify, if somewhat crudely, an average quarter in which projects come into service may be calculated by the following scheme:

- For projects which come into service in a specific quarter, assign the number of the in-service quarter to the project, i.e., assign the number "1" to projects that come into service in quarter one, the number "2" to projects that come into service in quarter two, etc.;
- For projects which come into service in e.g., "second half 2010," (quarter 3 or quarter 4) assign the "average" of the quarters, here the number "3.5";
- For projects in-service mid-year, e.g., "Mid-2010" assign the number "2.5"; and
- For projects whose in-service date straddles two quarters, e.g., "Q2-2008/Q3-2008" assign the average of the two quarters' numbers, in this case "2.5."

If such a coding is applied to the 36 projects specified in the referenced response, the "average in-service date" is quarter 3.55.

- a) Has it been GLPT's experience that by far most projects are in-service considerably later than mid-year? If so, please explain why, in general, so few projects are in-service by mid-year.

#### Question #19 Actual vs. Forecast CapEx

Reference: Ex 10/T2/S1 IR#4 a)

- a) For the previously approved projects, i.e., all but the three lines "Other Capital Additions" that were "not previously approved" for the years 2007-2009, does GLPT agree that in the aggregate the approved spending was 5.90% above the actual total?

- b) If possible, please provide the total contingency amount included in the Board approved \$25,277,200 Subtotal referenced in a) above.
- c) Please detail any changes made after 2006 in GLPT's approach with respect to budgeting for contingencies.

**Question #20** Actual vs. Forecast CapEx

**Reference:** Ex 10/T2/S1 IR#4 a) and b)

**Preamble:** The Appendix indicates that the approved corporate capital budget for GLPT was \$11,274,930 in 2006. However, the response to #4 a) indicates that 2006 Board approved total for 2006 was \$13,392,200.

- a) Please explain why the Board approved capital expenditures for 2006 exceeded the corporate capital budgeted amount by more than \$2.1M.
- b) Please confirm that the actual 2006 capital spending of \$14,308,727 includes \$2.913M of spending that was approved for spending in 2005 (CIRS Phases 1 & 2 and Hollingsworth TS Refurb). If unable to so confirm, please explain.
- c) Please provide the contingency amounts included in the corporate approved capital budgets for each year 2006-2010 inclusive.

**Question #21** WCA

**Reference:** Ex 10/T2/S1 IR #4 b)

- a) Please provide the details with respect to any contractual or structural changes that would be expected to result in changes in lead or lag days since the study was completed (if applicable.)
- b) Will the July 1, 2010 implementation have any consequences with respect to WCA? Please explain.

**Question #22** HST and PST – Capital Spending

**Reference:** Ex 10/T2/S1 IR# 6

- a) Please indicate whether providing the information requested in parts a) and b) of the referenced IR is (i) impossible or (ii) merely arduous in GLPT's view.

- b) Please indicate whether GLPT is able to provide an estimate of 2010 savings due to the implementation of the HST. If able, please provide an estimate. If not, please explain why not.
- c) Is GLPT amenable to the establishment of a deferral account to track actual savings related to HST implementation?

**Question #23** Energy Audit on the Building Complex

**Reference:** Ex 10/T2/S1 IR# 12

- a) Please indicate why energy savings due to building envelope improvements are unaffected by Algoma Power Inc.'s implementation of any of the recommendations.
- b) Please provide an update to part a) of IR #12.

**Question #24** Incentive Plan

**Reference:** Ex 10/T2/S1 IR# 15

- a) Is it GLPT's view that ratepayers would be adversely affected if the incentive plan were made less generous? Please explain fully.