

**Board Staff Supplemental Interrogatories
Whitby Hydro Electric Corp.
2010 Electricity Distribution Rates
EB-2009-0274**

31. Customer Numbers in Capital Expenditures versus Rate Design

Ref: IRR VECC #6; Exh 3, Table 10; Attachment 7-4 (complete Excel File Application Models 2d)

The response to VECC # 6 shows 39,856 customers forecast in 2010, in background data underlying the forecast of capital expenditures. As background to the load forecast, Exhibit 3 Table 10 shows 37,119 at year-end, and less than that as an average. The forecast in the cost allocation table 'Whitby APPL_8', worksheet I6 shows 39,395 customers total, of which Streetlights is a single customer. Please reconcile these inputs, and if necessary modify some or all of the various outcome(s) that depend on them.

32. Cost Allocation

Board staff apologizes that IR # 19 was based on the incorrect assumption that a detailed cost allocation study had not been filed. That has been corrected in the response, which pointed out that the complete working model has been filed with the application.

Ref: IRR Board staff # 19; Attachment 7-4 (Application Model 2d); and Exhibit 3, Table 9 (p. 203)

The class demand inputs in Worksheet I8 do not correspond with the forecasts of billing demand amounts in Exhibit 3. For example the forecast kW for the GS>50 class is 966,330 kW while the input for DNCP12 is 774,545 kW, whereas the forecast kW for Streetlights is 24,361 kW and DNCP12 is 25,593 kW.

- a) Please re-examine these amounts for consistency, and make any adjustments to the load forecast and/or the cost allocation study that might be necessary to achieve a higher level of consistency.
- b) If a change is not made to the data, please explain why the quantities for streetlights should not be approximately equal, given that streetlights would be expected to have very little diversity amongst themselves..

- c) Please provide a description of the source of the data for the GS>50 kW class, and how the amounts in the two referenced documents were derived from the underlying data.

33. Forecast of Wholesale Transmission Costs

Ref: IRR Board staff # 2 and # 22; Rate Order EB-2009-0096, p. 27 of 589

- a) Please clarify the sentence in the response to # 22c: "The billing kW amounts assumed represent approximately 0.2% of the wholesale weather normalized consumption forecast for 2010". If the amount 0.2% is intended to be the increase of the 2010 forecast over the 2009 weather corrected actual amount, please reconcile this amount with the energy forecast (Exhibit 3, Table 9).in which the increase over 2009 is approximately 0.5%.
- b) Please update the forecast of transmission cost using the recently approved Retail Transmission Service Rates for Whitby Hydro's host distributor Hydro One Networks, and make the resulting adjustments to the Working Capital Allowance and make any changes to Whitby Hydro's proposed Retail Transmission Service Rates. (For convenience, the rates are \$2.65 per kW Network and \$2.14 per kW Connection)

34. Low Voltage Adder

Ref: IRR Board staff # 3 and # 23; Rate Order EB-2009-0096, p. 26 of 589

Please update the four-year average LV cost using the Hydro One Networks' newly-approved Subtransmission Class Rates. Please make the resulting adjustments to the Working Capital Allowance, and make any changes to Whitby Hydro's proposed LV adders.

35. Service Revenue Requirement

Ref: IRR Board staff # 30 and VECC # 40

The response provided an update of the revenue requirement that was consistent with responses to interrogatories as well as more recent information.

Upon completion of responses to all supplemental interrogatories, please provide any further adjustments to ensure consistency with the responses, so that the combined response will show all adjustments that Whitby Hydro would now propose to make relative to the original application.

36. Foregone Revenue Rate Rider

Ref: IRR VECC # 1

Whitby Hydro has confirmed that it is seeking an effective date of May 1, 2010, and in its response has included the assumption that the implementation date might be July 1, 2010. Using an alternative assumption that the implementation date would be August 1, please calculate the revenue that would be foregone between May 1 and August 1, 2010, and provide a calculation of rate riders that would recover the revenue over the period to April 30, 2011.