

Ontario Energy Board

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c.15, Sched. B, as amended;

AND IN THE MATTER OF an Application by Enersource
Hydro Mississauga Inc. for an Order or Orders approving or
fixing just and reasonable distribution rates and other charges
for the distribution of electricity commencing May 1, 2008.

**INTERROGATORIES OF
ENERGY PROBE RESEARCH FOUNDATION
("ENERGY PROBE")**

November 6, 2007

**ENERSOURCE HYDRO MISSISSAUGA INC.
2008 - 2010 RATES CASE**

EB-2007-0706

**ENERGY PROBE RESEARCH FOUNDATION
INTERROGATORIES**

Interrogatory # 1

Ref: Exhibit A/Schedule 11/Tab 1.1

Background:

In the RP-2005-0020/EB-2005-0360 Decision With Reasons, in respect of the Applicant's 2006 Rates Case, the Board examined unfilled vacancies at Page 5, Tier 1 adjustment – Unfilled Vacancies. In that proceeding Enersource requested \$1,131,601 be included in distribution rates in order to reflect the existence of 23 vacant positions that were over the normal number of vacant positions of 15. The Board did not approve the Applicant's request for \$1,131,601

The evidence in this proceeding describes 48 vacancies listed under the Enersource Corporation Organization Chart, 43 of which relate to the Applicant, the other 5 relating to Enersource Corporation.

Questions:

- a) What is the normal number of vacant positions for Enersource Hydro Mississauga for 2006 and 2007 that is comparable to the normal number of vacant positions of 15 for 2004 quoted in the Board's Decision With Reasons in RP-2005-0020/EB-2005-0360?**
- b) Please provide the ratio of vacant to active positions for Enersource Hydro Mississauga in the 2004 headcount in the RP-2005-0020/EB-2005-0360 proceeding, and the same statistic for 2006 and 2007.**

Interrogatory # 2

Ref: Exhibit A/Schedule 11/Tab 1.1

Background:

The evidence in this Schedule consists of a chart, the Enersource Corporation Organization Chart, which portrays a headcount of 47 listed under the Enersource Corporation, 5 of which are vacant, all of which appear to be involved in duties supporting functions of the Applicant. In the chart a headcount of 8 relates to the Executive function.

Questions:

- a) Please identify the management functions at the level of vice president and above which are outsourced from Enersource Hydro to the Enersource Corporation.**
- b) Please identify the president and the CEO of Enersource Hydro, and indicate whether they are employees of the Applicant or if the functions are outsourced.**
- c) Please advise the economies, if any, achieved by this arrangement for residential customers of Enersource Hydro.**

Interrogatory # 3

Ref: Exhibit A/Schedule 11/Tab 1.1

Background:

The evidence in this Schedule consists of a chart, the Enersource Corporation Organization Chart, which portrays a headcount of 14 listed under the Enersource Corporation, 1 of which is vacant, all of which appear to be involved in duties supporting functions of the Applicant in respect of Human Resources, Administration, Communications and Legal Counsel.

Questions:

- a) Please confirm that no personnel of the Applicant are involved duties supporting functions of the Applicant in respect of Human Resources, Administration, Communications and Legal Counsel.**
- b) Please advise the economies, if any, achieved by this arrangement for residential customers of Enersource Hydro.**

Interrogatory # 4

Ref: Exhibit A/Schedule 11/Tab 1.1

Background:

The evidence in this Schedule consists of a chart, the Enersource Corporation Organization Chart, which portrays a headcount of 29 listed under the Enersource Corporation, 4 of which are vacant, all of which appear to be involved in duties supporting functions of the Applicant in respect of Finance.

Questions:

- a) Please confirm that no personnel of the Applicant are involved duties supporting functions of the Applicant in respect of Finance.**
- b) Please advise the economies, if any, achieved by this arrangement for residential customers of Enersource Hydro.**
- c) Has Enersource Hydro ever had an internal Finance department?**

Interrogatory # 5

Ref: Exhibit A/Schedule 11/Tab 1.1

Background:

The evidence in this Schedule consists of a chart, the Enersource Corporation Organization Chart, which portrays a headcount of 47 listed under Enersource Hydro, 7 of which are vacant, all of which appear to be involved in duties supporting functions of the Applicant in respect of Information Services.

Questions:

- a) Please confirm that no personnel of the Enersource Corporation are involved duties supporting functions of the Applicant in respect of Information Services.**
- b) Do Enersource Corporation personnel supporting functions of the Applicant in respect of Finance use hardware, software and expertise of the Applicant's Information Services function in order to perform their duties?**
- c) Are these Enersource Corporation personnel entirely devoted to the Applicant's Finance function, or are they also performing duties in respect of the Finance function of the Enersource Corporation?**

Interrogatory # 6

Ref: Exhibit A/Schedule 14/Tab 1

Background:

The evidence in the form of a Services Agreement between Enersource Hydro Mississauga Inc. and Enersource Corporation provides at Article 3.2 Performance Standards.

Questions:

- a) Please advise the penalties, other than right of termination by Enersource Hydro Mississauga Inc., that could be assessed against Enersource Corporation for failure to perform in the top quartile of industry standards as described.**
- b) Have any complains been filed by Enersource Hydro Mississauga Inc. in respect of a failure to perform?**

- c) In respect of Article 3.4, please advise the penalties, other than right of termination by Enersource Hydro Mississauga Inc., that could be assessed against Enersource Corporation for failure to comply with the listed covenants.**
- d) Please provide the last time that Enersource Hydro Mississauga Inc. compared or assessed the economic benefits of having the services described in the Services Agreement performed within the regulated utility versus outsourcing these services to Enersource Corporation. Please provide the results of this assessment and provide any report containing the assessments.**

Interrogatory # 7

Ref: Exhibit D/Schedule 1/Tab 5

Background:

The evidence describes the Bad Debt experience of the Applicant and its efforts to improve its collections process.

Questions:

- a) Does the Applicant track Bad Debt experience due to “grow op” activities within its franchise area?**
- b) If it does track those losses, has there been an upward trend over the last 3 years?**