Renfrew Hydro Inc. EB-2009-0146 Supplemental Interrogatory Responses Board Staff Interrogatories received 25 August, 2010 Responses filed 23 September, 2010 Page 1 of 12

RENFREW HYDRO INC. ("RHI") 1 **RESPONSES TO BOARD STAFF** 2 SUPPLEMENTAL INTERROGATORIES 3 **QUESTION #S1** 4 5 Ref: Applicant's response to Board staff interrogatory #1 6 In response to Board staff interrogatory #1, the Applicant filed an updated set of 7 models that, among others, provided updated estimates for Revenue Requirement and Total Bill Impacts. 8 9 Please confirm that the updated values contained in the re-filed set of models are 10 the values on which the Applicant will now rely and for which it requests Board 11 approval. 12 **RESPONSE:** 13 14 RHI confirms that it relying on the updated values and requests Board approval on that 15 basis. For consistency, all interrogatory responses refer to the data as originally 16 submitted, unless otherwise requested or explicitly stated in the response. 17 18

Renfrew Hydro Inc. EB-2009-0146 Supplemental Interrogatory Responses Board Staff Interrogatories received 25 August, 2010 Responses filed 23 September, 2010 Page 2 of 12

1 QUESTION #S2

Ref: Applicant's Response to Board staff interrogatory #5

Part of the Applicant's response to this interrogatory was a table "Residential Total Bill Impacts" which showed for a range of "Monthly kWhs" and separately for both "Summer" and "Winter", the dollar ("\$") and percentage ("%") increases inherent in the Applicant's proposed rates. For example; at 800 Monthly kWhs and for Summer, the increase is shown as \$2.65 and 2.6% which is the same increase in the Applicant's pre-filed evidence; this appears to be different from the increases provided in response to Board staff interrogatory #1.

Please update, as necessary, the Applicant's response to Board staff interrogatory #5 with data that is consistent with that on which the Applicant will now rely.

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14 **RESPONSE:**

Residential Total Bill Impacts

	Or	iginal App	lication		Amended Application							
Monthly	Sumn	ner	Wir	nter	Sum	mer	Winter					
kWh's	\$	%	\$	%	\$	%	\$	%				
100	\$1.90	7.5%	\$1.90	7.5%	\$1.88	7.5%	\$1.88	7.5%				
250	\$2.05	5.0%	\$2.05	5.0%	\$2.00	4.9%	\$2.00	4.9%				
500	\$2.35	3.5%	\$2.35	3.5%	\$2.20	3.3%	\$2.20	3.3%				
800	\$2.65	2.6%	\$2.69	2.7%	\$2.40	2.4%	\$2.47	2.5%				
1,000	\$2.85	2.3%	\$2.85	2.4%	\$2.56	2.1%	\$2.56	2.1%				
1,500	\$3.40	1.9%	\$3.40	1.9%	\$2.92	1.6%	\$2.92	1.7%				
2,000	\$3.93	1.7%	\$3.93	1.7%	\$3.31	1.4%	\$3.31	1.4%				

Renfrew Hydro Inc. EB-2009-0146 Supplemental Interrogatory Responses Board Staff Interrogatories received 25 August, 2010 Responses filed 23 September, 2010 Page 3 of 12

QUESTION #S3

2 Ref: Applicant's Response to Board staff interrogatory #11
3 In its response, the Applicant provided the actual and approved (budget) capital costs for each year 2006 to 2009. With reference to the approved capital cost in each year, the actual cost was shown to be:
6 2006 17.9% under spent

7 2007 12.8% over spent 8 2008 39.8% under spent 9 2009 2.0% under spent

Since the annual average capital under-expenditure is in the order of 12%, then requested rates based on the 2010 approved budget may be expected to be inflated if the historical under-expenditure were to continue for 2010.

Please comment.

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RESPONSE:

The material under spending in 2006 are 2008 were due to exceptional factors which are described in the original response. RHI does not expect a recurrence of such factors in 2010. RHI notes that the budget variance in its 2009 capital spending was less than the materiality threshold. As at August 31st, 2010, RHI's year-to-date capital expenditures of \$375,942 represents 72.2% of the \$517K total projected for the year. At year end, RHI expects a budget variance less than the materiality threshold on its 2010 capital expenditures.

Renfrew Hydro Inc. EB-2009-0146 Supplemental Interrogatory Responses Board Staff Interrogatories received 25 August, 2010 Responses filed 23 September, 2010 Page 4 of 12

QUESTION #S4

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- 2 Ref: Applicant's Response to Board staff interrogatory #17
- Board staff interrogatory #17 was concerned, among others, with trends in the data used for load forecasting and with the weather normalization of the base data.
- To help clarify the Applicant's response:
 - a) Please confirm or correct Board staff's understanding that the 2005-2009 data for each rate class in Exhibit 3, Tab 1, Schedule 2, Attachment 1, page 5, Table 4 "Actual Average use Per Customer, Renfrew Hydro" are the data whose average (arithmetic mean) for each class was multiplied by the 2010 forecasted number of customers to determine the 2010 weather-normalized (by definition) kWh load forecast. (For example; for the Residential class the 2005-2009 values of 9,177 kWh, 8,664 kWh, 8,733 kWh, 8,787 kWh and 8,491 kWh have an average value of 8,770.4 kWh which, when multiplied by the 2010 forecasted number of customers of 3,635 produces a load forecast of 31,880,404 kWh i.e. 31,881,465 kWh after correcting for rounding errors.)
 - b) Using the input data for each class referenced in a) above either the data shown in the referenced Table 4 or corrected data provided by the Applicant please determine the straight line relationship and calculate the extrapolated 2010 kWh value for each class
 - c) Please provide the five input historical values alluded to in the Applicant's response to part c) that produced the "five-year historical average used to derive weather-normalized NAC values" and explain how the unique weather characteristics for <u>each</u> of the five years were taken into account (i.e. as distinct from assuming the weather in each year was precisely the same).

RESPONSE:

- 28 a) RHI confirms that Board staff's understanding as stated in the question is correct.
- b) RHI has calculated the extrapolated values as follows (RHI has not proposed any
 correction to projected retail volumes):

Renfrew Hydro Inc. EB-2009-0146 Supplemental Interrogatory Responses Board Staff Interrogatories received 25 August, 2010 Responses filed 23 September, 2010 Page 5 of 12

2010 Extrapolation

Residential	9,020
GS < 50kW	27,440
GS > 50kW	840,602
Street Light	955
USL	4,872

RHI does believe these extrapolations to be useful. A linear trend does not in any way reflect a "normalization" process. It assumes that the value is somehow related to the passage of time. While a small portion of energy consumption per customer may be time related (in the sense of increased conservation, etc.), the overwhelming variation is due to weather, which is why we "weather normalize". Simple linear trending does not do this. Also of concern is the fact that the starting point for the trend line asked for is 2005, which happens to be the warmest year on record. In RHI's view, a more appropriate method is to use an arithmetic mean where the probability of each of the 5 years occurring is weighted equally.

c) RHI has not analyzed the unique weather characteristics of each year. As stated in the question, the historical five-year average was used to derive a weathernormalized NAC for 2010. RHI does not have weather-normalized data for the historical years used in its forecast.

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Renfrew Hydro Inc. EB-2009-0146 Supplemental Interrogatory Responses Board Staff Interrogatories received 25 August, 2010 Responses filed 23 September, 2010 Page 6 of 12

QUESTION #S5

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Ref: Applicant's Response to Board staff interrogatory #18

The Applicant provided background to its decision to reject the load forecast it had developed using a multivariate approach since it produced "unusually pessimistic" results and instead filed a forecast based on the Normalized Average Consumption ("NAC") approach.

Please provide detailed rationale for the Applicant's rejection of the forecast developed using the multivariate approach.

RESPONSE:

RHI provided a detailed rationale in its original application; see Exhibit 3/1/2/1: p.2. A multivariate approach based on wholesale load is problematic, as declining volumes in General Service classes impact the projection for the Residential class, resulting in an overly pessimistic estimate. RHI supported this view in its response to Board staff IR #18(c): the multivariate approach produced estimates for 2009 and 2010 which were well below the actual result of any the past five historical years, despite a slowly growing Residential customer base.

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Renfrew Hydro Inc. EB-2009-0146 Supplemental Interrogatory Responses Board Staff Interrogatories received 25 August, 2010 Responses filed 23 September, 2010 Page 7 of 12

QUESTION #S6

Ref: Applicant's Response to Board staff interrogatory #22

The Applicant provided an updated table showing Total Compensation and Expenses by Employee Group for the years 2006 to 2010. In particular the table showed Total Compensation for "Mgmt/non-union" for the years 2009 and 2010 to be \$69,493 and \$73,804 respectively.

Please confirm that the year-over-year increase is in the order of 6.2% and rationalize the magnitude of the increase in the current economic climate.

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RESPONSE:

- The comparison as stated in the question is misleading as the 2009 Average
 Compensation of 69K takes into consideration the hiring of a summer student while the
- 13 2010 Average Compensation of 73K does not.

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As stated in the application, RHI's workforce is comprised of 5 full-time non union employees. Under normal circumstances, RHI employs a summer student to assist with special projects and provide relief for office staff vacations. In 2010, due to the economic situation as well as the unavailability of existing staff to train a student, RHI opted not to hire a summer student.

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TOTAL COMPENSATION AND EXPENSES BY EMPLOYEE GROUP

	2009 Including summer student		2009 Excluding summer student		2010 (no summer students)		
Compensation (Salary & Wages)							

Description	2009		2009		2010	
	Actual		Actual		Test	
Mgt/non-union	5.3		5		5	

Renfrew Hydro Inc. EB-2009-0146 Supplemental Interrogatory Responses Board Staff Interrogatories received 25 August, 2010 Responses filed 23 September, 2010 Page 8 of 12

Compensation (Salary & Wages)

Description	2009	Average	2009	Average	2010	Average
	Actual		Actual		Test	
		\$54,191.7	\$278,123.0	\$55,624.6	\$288,002.0	\$57,600.4
Mgt/non-union	\$287,216.00	0	0	0	0	0

Compensation (Benefits)

Description	2009	Average	2009	Average	2010	Average
	Bridge		Bridge		Test	
		\$15,301.7		\$15,974.4		\$16,203.8
Mgt/non-union	\$81,099.00	0	\$79,872.00	0	\$81,019.00	0

Total (Salary and Wages & Benefits)

Description	2009	Average	2009	Average	2010	Average
	Bridge		Bridge		Test	
		\$69,493.4	\$357,995.0	\$71,599.0	\$369,021.0	\$73,804.2
Mgt/non-union	\$368,315.00	0	0	0	0	0

Renfrew Hydro Inc. EB-2009-0146 Supplemental Interrogatory Responses Board Staff Interrogatories received 25 August, 2010 Responses filed 23 September, 2010 Page 9 of 12

QUESTION #S7

2	Ref: Exhibit 4/2/1/p1
3	Inflation appears to be built into the Applicant's OM&A costs.
4 5	Please identify the inflation rate used for the 2010 OM&A forecast and the source document(s) for the inflation assumptions.
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7	RESPONSE:
8	Renfrew's OM&A forecast is not based on a formulaic type method (i.e. applying a
9	specific inflation factor). Instead, Renfrew uses a more judgmental approach to its
10	forecasting method. The approach includes a thorough analysis of historical costs,
11	intuitive judgments, opinions and subjective estimates. Each account is looked at
12	individually.
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Renfrew Hydro Inc. EB-2009-0146 Supplemental Interrogatory Responses Board Staff Interrogatories received 25 August, 2010 Responses filed 23 September, 2010 Page 10 of 12

QUESTION #S8

2 Ref: Exhibit 4/2/6/p1 3 Please state whether or not the Applicant has included an amount for recovery of late payment penalty litigation costs in its 2010 Test Year application. If yes, 4 5 please identify the amount and explain how the Applicant is proposing to recover 6 the amount (e.g. customer rate classes that would be affected and whether the 7 amount would be recovered by means of a fixed or variable charge or a 8 combination thereof). If yes, please provide evidence supporting the amount allocated to the Applicant (e.g. through the settlement agreement). 9 10 **RESPONSE:** 11

- 12 RHI's rate application does not include any amount to recover late payment penalty
- 13 litigation costs.

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Renfrew Hydro Inc. EB-2009-0146 Supplemental Interrogatory Responses Board Staff Interrogatories received 25 August, 2010 Responses filed 23 September, 2010 Page 11 of 12

QUESTION #S9

2	Ref: Exhibit 8/4/3/p1
3 4	Occasionally rates and charges are contained in an applicant's Conditions of Service.
5 6 7 8 9 10 11	 Please identify any rates and charges that are included in the Applicant's Conditions of Service and provide an explanation for the nature of any costs being recovered. Please provide a schedule outlining the revenues recovered from these rates and charges from 2006 to 2009 and the revenues forecasted for the 2010 Test Year. Please explain whether in the Applicant's view, these rates and charges should be included on the Applicant's tariff sheet.
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14	RESPONSE:

15 RHI does not have any rates and charges in its Conditions of Service.

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Renfrew Hydro Inc. EB-2009-0146 Supplemental Interrogatory Responses Board Staff Interrogatories received 25 August, 2010 Responses filed 23 September, 2010 Page 12 of 12

QUESTION #S10

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2 Ref: Applicant's Response to Board staff interrogatory #28 3 Board staff interrogatory #28 read: 4 "Ref: Exhibit 9/1/2/1/pp5-6 5 The "Continuity Statements for Deferral/Variance Accounts", pages 5 and 6 shows under Jan 1/09 to April 30/09, and under May 1/09 to Dec. 31/09, a 6 column titled "Other". 7 8 Please explain what these columns represent. 9 How were the numbers in the column titled "Other" derived?" 10 The Applicant's response was: 11 "The figures under the 'Other' columns reflect all principal balance 12 changes in the accounts (excluding carrying charges)."

RESPONSE:

16 RHI's principal balance changes can be summarized as follows:

2009 Principal Balance Changes

		1-Jan-09 to	1-May-09 to	2009
		30-Apr-09	31-Dec-09	Total
Settlement Variances	LV (#1550), RSVA (158x)	(37,352)	(327,366)	(364,718)
Smart Meters	Capital (#1555), OM&A (#1556)	(1,742)	30,778	29,037
Other Group 2	<i>#1508, #1518, #1548</i>	380	5,068	5,449
TOTAL		(38,713)	(291,519)	(330,232)

Please provide a comprehensive answer to both part of the original interrogatory.

The balance changes for Settlement Variances reflects the difference between the charges collected from ratepayers and charges paid by RHI for its power supply. The balance changes for Smart Meters reflect the proceeds from the rate adder and spending on smart meters. The types of costs recorded to the other 'Group 2' deferral and variance accounts are described in Exhibit 9/1/2, p.2.

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