

INTERROGATORIES FOR NEWMARKET-TAY POWER

EB-2009-0269

FROM THE CONSUMERS COUNCIL OF CANADA

GENERAL

1. Newmarket-Tay (N-T) is applying for 2010 rates in the middle of the 2010 rate year. Are the forecasts all based on forecast amounts or is there some element of actual data included in the forecast? To what extent is N-T prepared to update its filing to include actual data where available?
2. Please explain what N-T's intention is with respect to 2011 rates. Will there be another cost of service application for 2011 rates or is N-T moving in 2011 to 3rd Generation IRM? Please explain.

RATE BASE

3. (Ex. 2/T4/S3/p. 9) Please provide an updated version of the 2010 capital plan which includes actuals to date and current projected in-service dates.
4. (Ex. 2/T4/S4/Leadbeater Municipal Station) The evidence indicates that the refurbishment of the Leadbeater MS was deferred to 2010 because of delays in procuring equipment. Please provide an updated status on the project.
5. (Ex. 2/T4/S3/Customer Additions) Please provide an updated customer addition forecast for 2010.
6. (Ex. 2/T4) Please provide a schedule setting out total annual capital expenditures for the years 2002-2010.
7. (Ex. 2/T4/S3/Project C198) Please provide an update on the Infrastructure Project. What has been spend to date and what is the most recent projected in-service date.
8. (Ex. 2/T4/S3/ Pole replacement) Please provide a schedule setting out annual pole replacement costs for the years 2002-2010.
9. (Ex. 1/T1/S3/p. 8) The evidence indicates that in 2006 the Applicant embarked on an accelerated implementation of the government's smart meter program. Please provide a table providing the following: all smart meter costs, capital and OM&A, that have been spent, to date on N-T's smart meter program. Please break out by year. In addition, please provide a detailed table, by year setting out the revenues recovered from N-T's customers since 2006 related to its smart meter program. What specific relief is N-T seeking from the Board with respect to its smart meter costs?
10. (Ex. 1/T1/S3/p.8) What is N-T's estimate of what has been spent to date on its smart meter program on a per customer basis? Please explain how N-T's recovery of smart meter costs differ from the Board's Guideline G-2008-0002 issued on October 22, 2008.

11. (Ex.1/T1/S3/p. 8) Has N-T benchmarked its smart metering costs against those of other LDCs? If not, why not? In the absence of such analysis, on what basis should the Board assess the prudence of N-T's costs?

12. (Ex. 2/T4/S5) Has N-T undertaken a forecast of capital expenditures for 2011? If so, please provide that forecast.

13. (Ex. 2/T5/S1) Has N-T undertaken any analysis to determine whether the methodology set out in the 2006 EDR Handbook for determining Working Capital Allowance (15% of the sum of the costs of power and controllable distribution expenses) remains appropriate for N-T. If so, please provide.

LOADS, CUSTOMERS AND THROUGHPUT REVENUE

14. (Ex. 3/T3/S2/p. 2) Please explain in detail how N-T developed its projected late payment charge forecast for 2010 of \$194,504.

OPERATING COSTS

15. (Ex. 4/T1/S1) OM&A Trend Table - Please provide Board approved numbers where applicable.

16. (Ex. 4/T1/S1/p. 5) Please provide a detailed breakdown of the 2010 Billing and Collecting budget for each year 2008 to 2010.

17. (Ex 4/T1/S2/p. 3) Please indicate whether the new engineering position has been filled.

18. (Ex. 4/T1/S2/p. 22) Please provide a detailed breakdown of each component of N-T's forecast regulatory costs.

19. (Ex. 4/T1/S2/p. 23) Why did N-T engage Navigant to do the TOU study? What are the implications of the study for N-T? Why didn't N-T collaborate with other LDCs when engaging Navigant?

20. (Ex. 4/T1/S2/p. 25) The evidence assumes a wage increase of 3%. What is the increase embedded in any collective bargaining agreements? What has been the actual wage increase in each of the last 5 years?

21. (Ex. 4/T2/S5) The evidence indicates that N-T has not included any amount for CDM as those programs are being funded by the OPA. Is the Applicant planning any changes to its filing in response to the new CDM Code recently issued by the Board. Will there be employees whose costs are included in the revenue requirement involved in the design and/or delivery of OPA-funded CDM?

22. (Ex 4/T3/S1) With respect to Billing and Collecting please include Board approved numbers where applicable and provide the relevant variance analysis.

23. (Ex. 4/T4/S1/p. 2) Please provide Board approved staffing levels for 2008.

24. (Ex. 4/T6/S1/p. 1) N-T has provided a forecast of goods and services to be purchased from third parties in 2010. Please explain how those amounts were developed. Please provide an updated forecast of these amounts to reflect actual experience to date.

COST OF CAPITAL AND RATE OF RETURN

25. (Ex. 5/T1/S1) Did N-T's senior management seek explicit approval from its Board of Directors to ask for the OEB's new ROE? If so, please provide all materials provided to the Board of Directors in support of that approval.

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