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October 25, 2010

BY EMAIL & COURIER

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge St, Suite 2701  
Toronto ON M4P 1E4

Dear Ms. Walli:

**Board File No. EB-2009-0274**  
**Whitby Hydro Electric Corporation – 2010 Cost of Service Application**  
**Energy Probe Interrogatories Round 3**

Pursuant to Procedural Order No. 4, issued by the Board on October 6, 2010, please find attached the Round 3 Interrogatories of Energy Probe Research Foundation (Energy Probe) in the EB-2009-0274 proceeding.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh  
Case Manager

cc: Ramona Abi-Rashed, Whitby Hydro Electric Corporation (By email)  
Andrew Taylor, Ogilvy Renault LLP (By email)  
Randy Aiken, Aiken & Associates (By email)  
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**Ontario Energy Board**

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

**AND IN THE MATTER OF** an Application by Whitby  
Hydro Electric Corporation for an order approving just  
and reasonable rates and other charges for electricity  
distribution to be effective May 1, 2010.

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

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**October 25, 2010**

**WHITBY HYDRO ELECTRIC CORPORATION  
2010 RATES REBASING CASE  
EB-2009-0274**

**ENERGY PROBE RESEARCH FOUNDATION  
THIRD ROUND INTERROGATORIES**

**Interrogatory # 65**

**Ref: Exhibit 5, page 337 &  
VECC Interrogatory # 39 &  
Board Staff Interrogatory # 30 &  
Exhibit JT1.8 &  
SEC Interrogatory # 12 Supplemental Information**

- a) Please confirm that the most recent cost of long term debt requested by Whitby Hydro is 6.67%, as indicated in Work Form attached to JT1.8. If this cannot be confirmed, please indicate what the requested cost of long term debt is and show how it has been calculated.**
- b) If the long term debt rate requested is 6.67%, please confirm that it is based on the mix of notes and rates shown in the response to VECC Interrogatory #39, parts (a) and (b).**
- c) Has Whitby Hydro obtained any new debt (i.e. the \$4,000,000 shown in the response to VECC # 39(b))? If yes, please indicate when the debt was obtained, the amount of the debt and the rate payable. Please also update the response to VECC # 39(b) to reflect the additional debt obtained.**

**Interrogatory # 66**

**Ref: Exhibit JT1.7**

**The response provides the actual year-to-date-figures for June 2010 for OM&A costs of \$4,178,000, or approximately 46.8% of the test year forecast.**

**Please provide the percentage of actual OM&A costs that were incurred in the year-to-date June period for each of 2007, 2008 and 2009.**

### Interrogatory # 67

Ref: Exhibit JT1.1 &  
VECC Interrogatory # 22(b) &  
Exhibit 3, Table 5

- a) Based on the same methodology used in the response to VECC Interrogatory # 22(b), please calculate the weather adjustment for each of 2002 through 2008.
- b) Based on the results of (a) above and the actual wholesale kWh's shown in Table 5 in Exhibit 3, please complete the following table:

Year	Actual kWh (a)	Weather Adjustment kWh (b)	Weather Normalized Actual kWh (c) = (a) + (b)
2002	780,336,017		
2003	792,491,625		
2004	825,196,089		
2005	911,868,734		
2006	897,193,025		
2007	911,211,760		
2008	897,673,634		
2009	876,959,953	19,895,736	896,855,689
2010	NA	NA	886,766,789

### Interrogatory # 68

Ref: Exhibit JT1.1 &  
VECC Interrogatory # 22(b) &  
Exhibit 3, Table 2

The response provided in JT1.1 indicates that the 19.9 kWhs calculated as requested by VECC in VECC Interrogatory # 22 uses only 2 parameters in isolation from a seven parameter model and that Whitby Hydro believes that this number does not reflect the true weather adjustment and is incorrect.

- a) Would any of the other five parameters be adjusted to reflect weather normalized actual consumption? If so, please show the calculation of the adjustment in the same format used in VECC # 22(b) showing the coefficient associated with the variable and the change in the variable between the actual value and the "normal" value for each parameter so adjusted. In addition, please explain how the "normal" value for each of these parameters was calculated.

- b) Would the weather normalized figure of 883.9 million kWh provided in the response to Energy Probe Interrogatory # 25(c) be impacted if the actual consumption in 2009 had been 890 million kWhs instead of the actual figure of 876,959,953? If yes, please explain.
- c) In the example provided in (b) above where the actual consumption had been 890 million kWh, would the normalization adjustment be (6,110,796) kWh (883,889,204 - 890,000,000)? If not, please provide the calculation of the appropriate weather adjustment if the actual consumption had been 890,000,000 kWh.
- d) Please confirm that the weather normal figures shown in Table 5 of Exhibit 3 are the forecasted figures using the actual parameter values for all explanatory variables with the exception of the heating and cooling degrees. Please further confirm that the heating and cooling degrees used to estimate the weather normal figures shown in Table 5 are the normal degrees (that is, the 10 year average for the degree days).
- e) Please provide a live spreadsheet that shows the calculation of the weather normal 883,889,204 kWh figure for 2009 showing the coefficients and parameter values used for each month of 2009.