



***PUBLIC INTEREST ADVOCACY CENTRE  
LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC***

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Michael Buonaguro  
Counsel for VECC  
(416) 767-1666

October 15, 2010

**VIA MAIL and E-MAIL**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge St.  
Toronto, ON  
M4P 1E4

Dear Ms. Walli:

**Re: Vulnerable Energy Consumers Coalition  
EB-2009-0262 and EB-2010-0121  
Clinton Power Corporation and West Perth Power Inc. – 2010 Electricity  
Distribution Rate Applications**

Please find enclosed the interrogatories of the Vulnerable Energy Consumers Coalition in the above-noted proceeding.

Thank you.

Yours truly,

Michael Buonaguro  
Counsel for VECC

Encl.

cc: Clinton Power Corporation  
Attention: Mr. Wally Curry, President & CEO

West Perth Power Inc.  
Attention: Mr. Wally Curry, President & CEO

WEST PERTH POWER INC.  
2010 RATE APPLICATION

(EB-2010-0121)

**VECC'S INTERROGATORIES (ROUND #2)**

(Numbering continues from Round #1 Interrogatories)

**Question #29**

Reference: VECC #1 a)

- a) Please provide more details regarding the data unavailability problems that led to the Application being filed 10 months after the Board's August 2009 filing date.
- ***In order to complete a cost allocation filing West Perth (along with the vast majority of utilities in the province) hired Hydro One to create its Load Data analysis and weather normalization.***
  - ***In preparing the data to provide to Hydro One it was determined that a vast majority of the required data was not available through any means to provide to Hydro One.***
  - ***Consequently Hydro One was not able to produce the data required to populate the cost allocation filing model.***
  - ***West Perth worked with Hydro One to determine a possible work around which never materialized.***
  - ***Without the Hydro One Load data there could be no Cost Allocation filing.***
  - ***West Perth filed an initial cost of service application in 2008 utilizing existing cost allocation parameters, however this application was removed from consideration due to the vast majority of interrogatories and the concern from the Board Staff regarding the lack of cost allocation data.***

**Question #30**

Reference: VECC #6  
OEB Staff #12 d) – f)

- a) Please provide an updated set of Continuity Statements (Exhibit 2/Tab 2/Schedule 2) that reflects the 2009 final values and corrects the various errors noted.
- ***Completed and included in excel form as WPPI Supplemental Interrogatory Responses Excel Tables.xls.***

- b) Are the results provided in response to part (a) consistent with the Rate Base Summary provided in response OEB Staff #11. If not, please reconcile.
- **Rate Base Summary is updated in Board Staff Supplemental Interrogatory response to question #4**

**Question #31**

**Reference:** VECC #9  
OEB Staff #13

- a) Please provide an update on the anticipated delivery/in-service date for the RBD.
- **The RBD is not anticipated to be delivered in 2010.**

**Question #32**

**Reference:** VECC #8 g)

- a) Please provide the schedule requested in the original question.

Project ID	Project Name	Project Description	1820 dist station	1830 Pole/Fixtures	1835 OH Conductor/Device	1840 UG Conduit	1845 UG Conductor/Device	1850 Transformers	1855 Services	1930 Transportation	Tools/Equip	Timing	Budgeted Costs	Units
#1	Wellington St, Hwy8	Overhead Enhancement 4kv to 27.6kv Conversion		\$67,000	\$23,000	\$3,500	\$9,500	\$14,000	\$3,000			Q2	\$ 120,000.00	1
#2	North on Wellington	Overhead 4kv to 27.6kv Conversion		\$20,000	\$10,000			\$24,000	\$2,000			Q3	\$ 56,000.00	1
#3	Dublin	Backyard moved to Front for Servicing		\$12,000	\$8,000				\$5,000			Q4	\$ 25,000.00	1
#4	Span Guying Upgrade	Guying Pole Replacements		\$16,000								Q2	\$ 16,000.00	4
#5	Long Term Load Transfer	Line Extension to Connect LTLT		\$37,000	\$18,000	\$2,500	\$3,000	\$3,500	\$2,000			Q2	\$ 66,000.00	1
#6	Tools and Equipment	Tools and equipment purchases									\$6,000	Q2	\$ 6,000.00	
													\$ -	
													\$ -	
<b>Total Capex Requirement</b>													<b>\$ 289,000.00</b>	

**Question #33**

**Reference:** VECC #12  
OEB Staff #19 – Steps # & #8  
Exhibit 3/Tab 2/Schedule 2, page9

- a) Please comment on the level of the R<sup>2</sup> values for both equations, the implied robustness of the results and the appropriateness of using them for purposes of weather normalization.

- For figures 1 and 2 below, the R2 values are 0.6076 and 0.2924 respectively. An R2 of 1.0 indicates that the regression line perfectly fits the data while R2 = 0 indicates no 'linear' relationship. We believe the R2 values may be greater if we use ten or more years of data. We did not do that in our analysis because we did not have the metering data going back so many years at the time of our study. We believe using our models are appropriate for the purpose of weather normalization.

Figure 1:

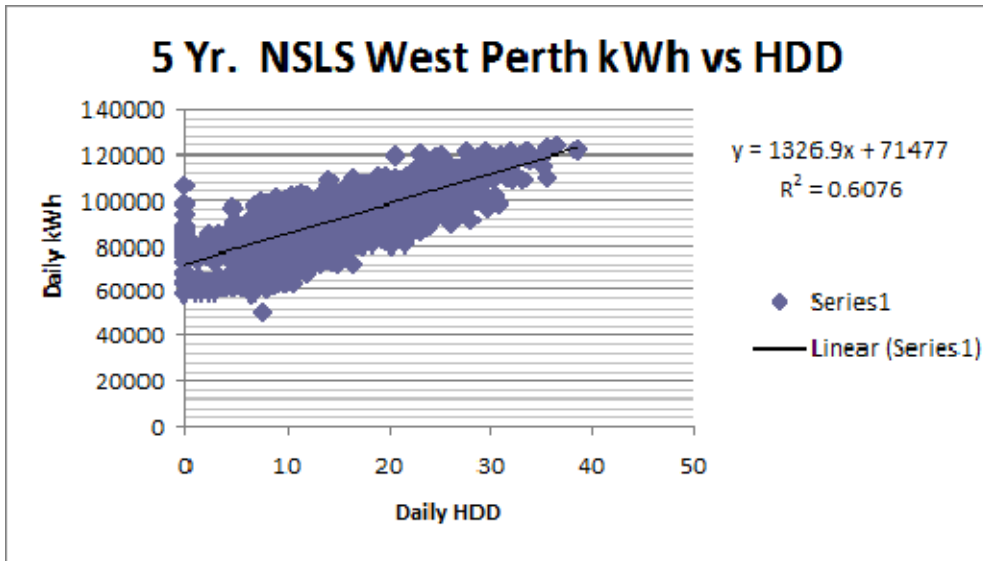
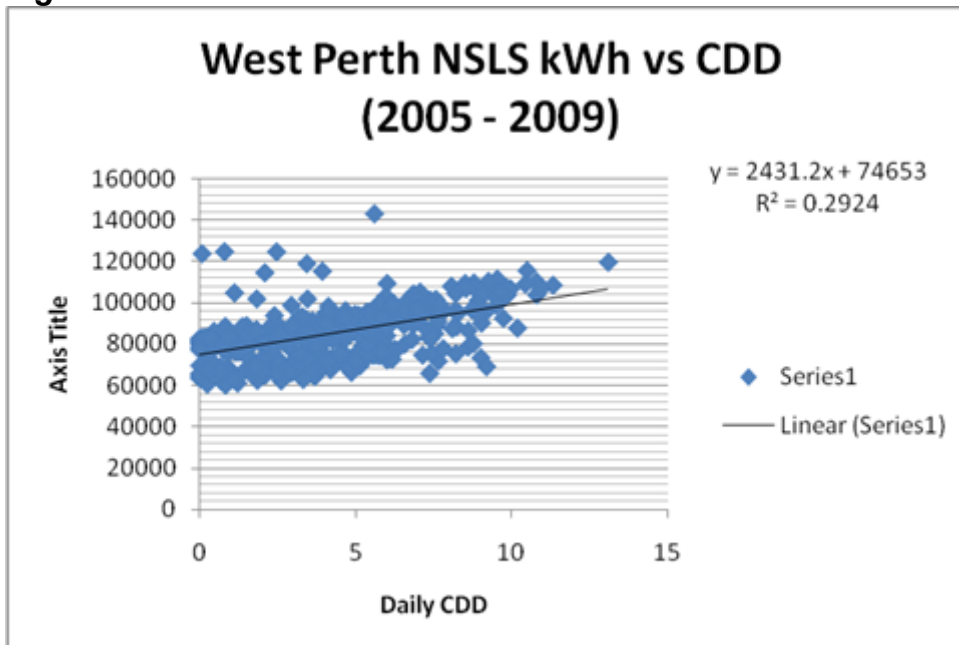


Figure 2:



- b) Please explain why no t-statistic was available since it is one of the outputs of most standard regression packages (parts (v) & (w) from original question).
- **The modeling was customized and no t-statistic is available.**
- c) Please provide the requested data requested in parts (y) and (z) of the original question and indicate the period the data covers.

Sep-10	Number of Customers
Res	1,792
GS<50	236
GS>50	20
StreetLight	1
Unmetered	4
Sentinel	NA

- **Billed Demand through the end of September 2010 for the GS > 50 kW class is 71,615.2.**

#### **Question #34**

**Reference:** VECC #14  
OEB Staff #39 a)

- a) With respect to part (f), please provide a breakdown as to the estimated cost for each component listed. The cost components listed in OEB Staff #39 a) only total to \$162,000 not \$172,000.
- **Answered in Board Staff Supplemental Interrogatories.**
- b) With respect to parts (f) & (g), please confirm that the internal management costs included here aren't already captured under another Administrative & General account.
- **Confirmed that the internal management costs included here aren't already captured under another G&A account.**

#### **Question #35**

**Reference:** OEB Staff 37  
VECC #14 (i) & (j)

- a) The file provided electronically in response to OEB Staff #37 indicates that all employee costs are capitalized. Please review and revise as necessary.
- **Please see response to this question in Board Staff supplemental responses.**

- b) Please reconcile any differences between the response to part (a) – above – and the response to VECC #14 (j).

### Question #36

Reference: VECC #16

- a) Please indicate which Board Staff interrogatory response addresses part (d)
- ***The following table corrects the issue questioned in VECC #16 D).***

DEPRECIATION, AMORTIZATION AND DEPLETION	2010 Test (\$'s)	Depreciation (\$'s)
Land and Buildings	\$15,784.71	\$1,491.33
TS Primary Above 50	\$0.00	\$0.00
DS	\$74,354.87	\$42.92
Poles and Wires	\$3,018,770.17	\$110,709.35
Line Transformers	\$1,541,475.50	\$61,109.26
Services and Meters	\$579,428.72	\$16,666.49
General Plant	\$0.00	\$0.00
IT Assets	\$139,433.31	\$200.00
Equipment	\$713,644.68	\$39,650.37
Other Distribution Assets	-\$282,597.60	-\$11,303.90
<b>GROSS ASSET TOTAL</b>	<b>\$5,800,294.36</b>	<b>\$218,565.83</b>

- b) Please provide a response to part (f).
- ***An issue with this calculation needs to be fixed and a response will be provided before the settlement conference.***

### Question #37

Reference: OEB Staff #18

- a) What is the basis/source of the prices used for each cost of power component?
- ***Please see response to Board Staff Supplemental interrogatory #7.***
  - ***The basis for each price is what West Perth was being charged at the time of the application.***
- b) What portion of West Perth's 2009 sales to each customer class are RRP vs. non-RPP?

CLASS	RPP	Non RPP	Total	RPP %
RES	12,597,967.65	12,105,074.88	24,703,042.53	51.00%
G<50	7,494,230.40	6,054,653.75	13,548,884.15	55.31%
G>50	2,294,434.96	32,207,190.65	34,501,625.61	6.65%
Sentinel	5,511.19	3,588.49	9,099.68	60.56%
Unmetered	17,189.64	12,892.23	30,081.87	57.14%
Streetlight	337,513.07	324,482.55	661,995.62	50.98%

### **Question #38**

**Reference:** OEB Staff #41

- a) Please confirm that there are no charges from EPTL included in the proposed revenue requirement for 2010.
- ***There are charges from ETPL for rate application preparation, and asset management.***

### **Question #39**

**Reference:** VECC #19

- a) Please indicate which OEB Staff interrogatory response provides the derivation, by rate class of revenues for 2010 based on current (2009) rates calculated as indicated in the original question. In the alternative, please respond to the original question.
- ***Board Staff Interrogatory Response #29 addresses the question raised in VECC #19.***
  - ***It is confirmed that smart meter and low voltage revenues were removed from this figure.***
  - ***However, in reviewing these answers it was determined 2010 load and customer data was not used please see update below.***

#### **2010 Revenue Projection - based on existing rates**

	Customers (Year-End)	Consumption (kWh / KW)	Distribution Revenues (\$)
Residential	1,797	15,569,208	\$420,282.36
GS<50	243	8,245,459	\$147,666.29
GS>50 to 499 kW	20	90,363	\$252,824.72
Unmetered Scattered Load	5	46	\$84.73
Sentinel Lighting	7	47	\$80.45
Street Lighting	618	1,196	\$3,780.16
<b>TOTAL</b>	<b>2,690</b>		<b>\$824,718.71</b>



#### Question #40

Reference: VECC #20 and #21  
OEB Staff #59 c)

- ***Please see all updates to the Cost Allocation modeling in the Board Staff Supplemental Interrogatory responses.***

- a) Please reconcile the customer count used in the updated Cost Allocation (Sheet I6) with that presented in Exhibit 3. Please revise the Cost Allocation as necessary,
- b) Please confirm that the Miscellaneous Revenues and Total Revenue Requirement used in the Cost Allocation do not match the data in the RRWF.
- c) Please confirm that the updated Cost Allocation still includes the “cost” of the TOA in the revenue requirement (per Sheet I3).
- d) With respect to the updated Cost Allocation, please explain how the Distribution Revenue by Customer Class shown in Sheet O1 (Row #18) was determined. Please provide the volumes and rates used for each class.
- e) With respect to the response to VECC #21 f) and g), please indicate the specific SEC IR response being referred to and confirm that it directly addresses the questions asked. (Note: The referenced file does not appear to be in the OEB’s web drawer).

#### Question #41

Reference: VECC #22

- a) With respect to part (i), please explain why the very same question was confirmed in the response to Clinton’s interrogatories (VECC #20 a)) but not confirmed for West Perth.
  - ***It should have been confirmed for West Perth. The question was interpreted incorrectly to be specific to whether West Perth met the requirements or not and since WPPI’s fixed charge is remaining the same it was deemed that the question was not necessary in WPPI’s scenario.***
- b) Please provide responses to parts (j), (m), (n) and (o). of the original question.

	ETPL Data	Atikokan Data
	MSC Ceiling	MSC Ceiling
Residential	\$ 23.36	\$ 23.35
GS < 50 kW	\$ 42.33	\$ 42.40
GS > 50 kW	\$ 126.18	\$ 126.21
Streetlighting	\$ 8.97	\$ 8.97
Sentinel Lights	\$ 7.17	\$ 7.61
Unmetered	\$ 18.21	\$ 18.21

j.

**2010 Proposed**

	Fixed %	Variable%
Residential	51.9%	48.1%
GS < 50 kW	26.6%	73.4%
GS>50 to 499 kW	15.0%	85.0%
Sentinel Lighting	0.0%	100.0%
Street Lights	9.1%	90.9%
Unmetered	8.8%	91.2%

**2010 Fixed**

	Fixed %	Variable%
Residential	63.8%	36.2%
GS < 50 kW	16.3%	83.7%
GS>50 to 499 kW	13.3%	86.7%
Sentinel Lighting	0.1%	99.9%
Street Lights	56.9%	43.1%
Unmetered	47.6%	52.4%

**2006 EDR**

	Fixed %	Variable%
Residential	63.8%	36.2%
GS < 50 kW	16.3%	83.7%
GS>50 to 499 kW	13.3%	86.7%
Sentinel Lighting	0.1%	99.9%
Street Lights	56.9%	43.1%
Unmetered	47.6%	52.4%

	A	B	A+B
	\$ 1,134,648.34	Transformer Allowance Recovery	
Residential	49.80% \$ 565,105.83		\$ 565,105.83
GS < 50 kW	20.64% \$ 234,205.09		\$ 234,205.09
GS>50 to 4999 kW	25.76% \$ 292,252.73	\$ 35,702.70	\$ 327,955.43
Sentinel Lighting	0.05% \$ 557.57		\$ 557.57
Street Lights	3.73% \$ 42,342.19		\$ 42,342.19
Unmetered	0.02% \$ 184.93		\$ 184.93
<b>Total</b>	<b>100.00% \$ 1,134,648.34</b>	<b>\$ 35,702.70</b>	<b>\$ 1,170,351.04</b>

	Customers	Fixed %	Fixed Revenue	Fixed Charge	Consumption	Variable Revenue	Variable Charge
Residential	1,797	51.9%	\$ 293,421.35	\$ 13.61	15,569,208	\$ 271,684.48	\$ 0.0175
GS < 50 kW	243	26.6%	\$ 62,256.60	\$ 21.35	8,245,459	\$ 171,948.49	\$ 0.0209
GS>50 to 4999 kW	20	15.0%	\$ 49,162.08	\$ 204.84	90,363	\$ 278,793.35	\$ 3.0853
Sentinel Lighting	7	0.0%	\$ -	\$ -	47	\$ 557.57	\$ 11.8718
Street Lights	618	9.1%	\$ 3,856.32	\$ 0.52	1,196	\$ 38,485.87	\$ 32.1810
Unmetered	5	8.8%	\$ 16.20	\$ 0.27	46	\$ 168.73	\$ 3.7047
<b>Total</b>			<b>\$ 408,712.55</b>			<b>\$ 761,638.49</b>	

### Question #42

Reference: VECC #23

- a) Please indicate which OEB Staff IR response specifically responds to this question. In the alternative, please provide a response.
- **Revenue Requirement Work Form has been updated in the Board Staff supplemental responses and the changes to the cost allocation modeling that ties these figures in.**

### Question #43

Reference: VECC #24 and #25  
OEB Staff #66, 67 and #68

- a) The Board Staff responses do not specifically address the issues raised in the VECC IRs. Please provide the requested information.
- **West Perth is still working on this issue and will respond prior to the Settlement Conference.**

### Question #44

Reference: VECC #26, #27 and #28

- a) Are the revised continuity schedules available? If yes, please provide. If not, please indicate when they are expected to be completed.
- **The revised schedules will be completed and distributed prior to the Settlement Conference.**

CLINTON POWER CORPORATION  
2010 RATE APPLICATION

(EB-2009-0262)

VECC'S INTERROGATORIES (ROUND #2)

(Numbering continues from Round #1 IRs)

Question #27

Reference: VECC #1 a)

- b) Please provide more details regarding the data unavailability problems that led to the Application being filed 10 months after the Board's August 2009 filing date.
- ***In order to complete a cost allocation filing West Perth (along with the vast majority of utilities in the province) hired Hydro One to create its Load Data analysis and weather normalization.***
  - ***In preparing the data to provide to Hydro One it was determined that a vast majority of the required data was not available through any means to provide to Hydro One.***
  - ***Consequently Hydro One was not able to produce the data required to populate the cost allocation filing model.***
  - ***West Perth worked with Hydro One to determine a possible work around which never materialized.***
  - ***Without the Hydro One Load data there could be no Cost Allocation filing.***
  - ***West Perth filed an initial cost of service application in 2008 utilizing existing cost allocation parameters, however this application was removed from consideration due to the vast majority of interrogatories and the concern from the Board Staff regarding the lack of cost allocation data.***

Question #28

Reference: VECC #5 a)

- c) Please explain the significant increase in capital spending on underground facilities (Accounts #1840 & 1845) in 2009 over 2008.
- ***This was due to the continuation of a subdivision on Ransford Street the services in this location are underground, The project commenced in 2008 and was finished in 2009.***

**Question #29**

**Reference:** VECC #6 b)

b) Reference is made to an “attached comprehensive report”. However, there appears to be no attachment. Please provide a copy of the referenced assessment and/or indicate where it has been previously filed.

- ***A copy of the report will be included as part of this response.***

**Question #30**

**Reference:** VECC # 7 a)

b) Please provide the information requested in the original interrogatory.

Project ID	Project Name	Project Description	1860 Metering	1830 Pole/Fixtures	1835 OH conductor/Device	1840 UG Conduit	1845 UG conductor/Device	1850 Transformers	1855 Services	1930 Transportation	Tools/Equip	Timing	Budgeted Costs	Units
#1	Ransford St.	13 Lot Infill Development				\$8,500	\$ 25,000	\$10,000	\$20,000			Q1	\$ 63,500	1
#2	Gordon St	Overhead Upgrade Enhancemet 4kv Designed to 27.6kv Standards		\$35,000	\$20,000			\$5,500	\$5,000			Q2	\$ 65,500	1
#3	Reach Centre	New C&I Customer Connection	\$3,000	\$4,000			\$6,000	\$30,000	\$2,000			Q2	\$ 45,000.00	1
#4	Wellington St	Overhead Upgrade Enhancemet 4kv Designed to 27.6kv Standards		\$37,000	\$3,500			\$3,500	\$4,000			Q4	\$ 48,000.00	1
#5	New Customer Connections	Cost of Connecting New Customers						\$3,500	\$4,000			Q4	\$ 7,500.00	5
#6	Tools & Equipment	Replacement of Old Tools									\$3,000		\$ 3,000.00	
#7													\$ -	
#8													\$ -	
			\$3,000	\$76,000	\$23,500	\$8,500	\$31,000	\$52,500	\$35,000	\$0	\$3,000			
2009 Capital Additions												\$ 232,500.00		

Note 1: no smart meter costs have been added

**Question #31**

**Reference:** Exhibit 2, Tab 2, Schedule 3, pages 9-10

a) The Continuity Statements show \$40,000 in additions to Meters (Account #1860) for 2010. Please explain this spending. Please confirm that spending on smart meters is recorded in a variance account and not included in rate base..

- ***The \$40,000 was spent on the wholesale meter point and it is not related to any Smart Meter spend which is recorded in the variance account as prescribe by the OEB.***

**Question #32**

**Reference:** VECC #10

- d) With respect to part (d), please confirm that the June 8, 2010 load forecast values were used in the Cost Allocation and Rate Design sections of the Application.
- ***The June 8 2010 load forecast was not used and needs to be updated in cost allocation and rate design.***
- e) Given the low  $R^2$  values for both equations, please comment on the robustness of the results and the appropriateness of using them for purposes of weather normalization.
- ***For figures 1 and 2, the  $R^2$  values are 0.49 and 0.44 respectively. An  $R^2$  of 1.0 indicates that the regression line perfectly fits the data while  $R^2 = 0$  indicates no 'linear' relationship. We believe the  $R^2$  values may be greater if we use ten or more years of data. We did not do that in our analysis because we did not have the metering data going back so many years at the time of our study. We believe using our models are appropriate for the purpose of weather normalization.***

Figure 1:

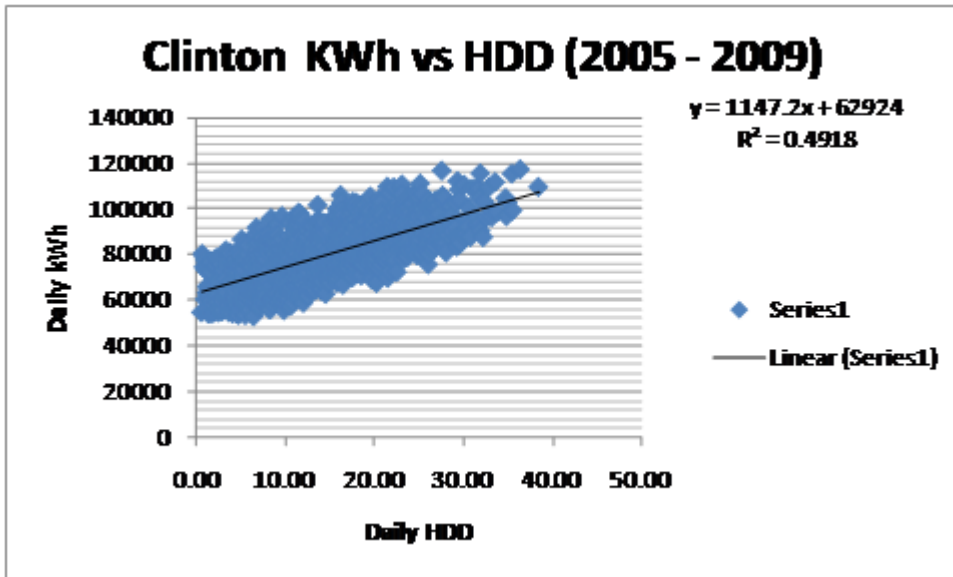
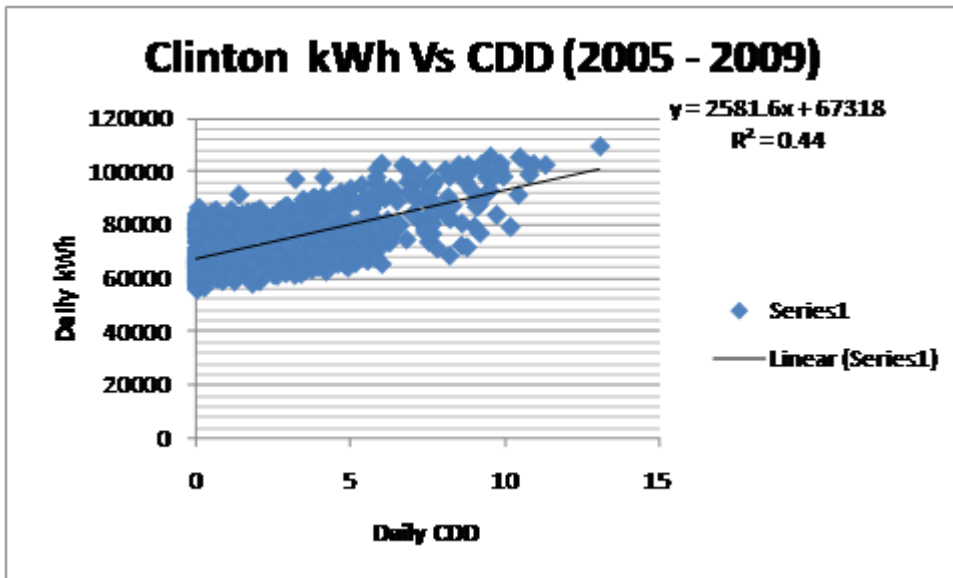


Figure 2:



- f) Please explain why no t-statistic was available since it is one of the outputs of most standard regression packages (parts (h) & (i)).
- ***The modeling was customized and no t-statistic is available.***
- g) With respect to parts (n) and (o), what month is the data for/up to?
- ***The data provided is up to the end of August.***

### Question #33

Reference: VECC #13

- c) With respect to part (a), please provide a breakdown as to the estimated cost for each component listed.
- ***Please see Board Staff Supplemental Responses.***

### Question # 34

Reference: VECC #14  
OEB Staff #34

- c) With respect to VECC #14 (a), the values reported in OEB #34 do not match those in Exhibit 2/Tab 2 – the Continuity Schedule (after removing the bucket truck @ \$240,000). Please reconcile the asset values reported for purposes of determining depreciation with those reported in the Continuity Schedule.
- ***Please see responses to Board Staff Supplemental Interrogatories with respect to the bucket truck.***

d) With respect to VECC #14 (b), is the “error” in the Continuity Schedules only with respect to Poles and Wires (#1830) or are corrections required to other accounts?

- ***This error is only with respect to account 1830.***

e) Please provide updated 2010 depreciation and rate base values that incorporate these corrections. Please show the revised values by asset account.

RATE BASE SUMMARY	2010 Test	Variance from 2009 Bridge	2010 Test without Bucket	Variance from 2010 Test
	(\$'s)	(\$'s)	(\$'s)	(\$'s)
<u>Gross Asset</u>				
Asset Values at Cost	\$2,058,908	\$371,804	\$1,818,908	-\$240,000
<u>Accumulated Depreciation</u>				
Depreciation	-\$529,513	-\$80,441	-\$520,013	\$9,500
Net Fixed Asset	<b>\$1,529,395</b>	<b>\$291,363</b>	<b>\$1,298,895</b>	<b>-\$230,500</b>
<u>Allowance for Working Capital</u>				
	\$436,919	\$24,905	\$436,919	\$0
Utility Rate Base	<b>\$1,966,314</b>	<b>\$316,268</b>	<b>\$1,735,814</b>	<b>-\$230,500</b>

### **Question #35**

**Reference:** VECC #17

b) The responses to the OEB Staff IRs do not appear to provide the requested information. Please provide a specific cross reference to the OEB Staff response(s) where the information can be found or provide the schedules requested.

- ***The schedules as requested can be found in the table below. The amount needs to be updated as 2010 load data was not used.***

	Customers (Year-End)	Consumption (kWh / KW)	Distribution Revenues (\$)
Residential	1,414	11,819,820	\$291,340.87
GS<50	221	5,388,897	\$107,358.63
GS>50 to 4999 kW	17	34,478	\$145,090.89
Unmetered Scattered Load	11	60,756	\$1,865.56
Sentinel Lighting	38	109	\$214.85
Street Lighting	709	1,008	\$1,605.60
<b>TOTAL</b>	<b>2,410</b>	<b>17,305,069</b>	<b>\$547,476.40</b>



### **Question #36**

**Reference:** VECC #18  
OEB Staff #44 a) and #45 c)

- ***Please see Board Staff Supplemental responses for Cost Allocation data and the refilled models utilizing both ETPL and Atikokan data.***
- f) In response to OEB Staff #44 a), a revised cost allocation is provided using EPTL data. However, the load data used in Sheet I6, the revenue requirement reported in Sheet O1 and the Miscellaneous Revenue by customer class reported in Sheet O1 all appear to have the same issues as identified in VECC #18 parts c) through f). Please provide a revised version of this Cost Allocation run with the corrected load data, corrected revenue requirement, correct treatment of the TOA and a reconciled allocation of miscellaneous revenues.
- g) OEB Staff #45 makes reference to an “updated” 2010 Cost Allocation (based on Atikokan’s load profiles). VECC has been unable to locate this file on the Board’s web site and requests that a copy be filed.
- h) With respect to the file provided in response to part (b), please confirm that the cost and load data addresses the issues noted in VECC #18.

**Question #37**

**Reference:** VECC #19

- a) It is assumed the response references SEC #15. The table provided therein does not address the question originally asked. Please provide a response to VECC #19..

	2010 Proposed			
	Fixed	%	Variable	%
Residential	\$ 13.61	50.2%	\$ 0.0194	49.8%
GS < 50 kW	\$ 21.35	30.0%	\$ 0.0245	70.0%
GS>50 to 4999 kW	\$ 204.84	15.5%	\$ 6.6147	84.5%
Sentinel Lighting	\$ -	0.0%	\$ 34.0189	100.0%
Street Lights	\$ 0.52	7.6%	\$ 53.3941	92.4%
Unmetered	\$ 0.27	3.1%	\$ 0.0184	96.9%

	2010 no % Change			
	Fixed	%	Variable	%
Residential	\$ 15.03	55.4%	\$ 0.0173	44.6%
GS < 50 kW	\$ 31.50	44.3%	\$ 0.0195	55.7%
GS>50 to 499 kW	\$ 65.20	4.9%	\$ 7.4409	95.1%
Sentinel Lighting	\$ 6.45	79.4%	\$ 7.0199	20.6%
Street Lights	\$ 5.87	85.8%	\$ 8.2024	14.2%
Unmetered	\$ 7.31	83.5%	\$ 0.0031	16.5%

	2010 No Fixed Change			
	Fixed	%	Variable	%
Residential	\$ 9.23	33.9%	\$ 0.0258	66.1%
GS < 50 kW	\$ 18.13	25.4%	\$ 0.0262	74.6%
GS>50 to 4999 kW	\$ 31.84	2.4%	\$ 7.6607	97.6%
Sentinel Lighting	\$ 0.21	2.5%	\$ 33.2597	97.5%
Street Lights	\$ 0.12	1.7%	\$ 56.9424	98.3%
Unmetered	\$ 9.11	103.7%	\$ (0.0007)	-3.7%

	2006 EDR			
	Fixed	%	Variable	%
Residential	\$ 9.07	55.4%	\$ 0.0097	44.6%
GS < 50 kW	\$ 17.81	44.3%	\$ 0.0096	55.7%
GS>50 to 4999 kW	\$ 31.28	4.9%	\$ 3.4052	95.1%
Sentinel Lighting	\$ 0.21	79.4%	\$ 0.3861	20.6%
Street Lights	\$ 0.12	85.8%	\$ 0.1701	14.2%
Unmetered	\$ 9.11	83.5%	\$ 0.0099	16.5%

- b) Please provide a schedule that sets out how the Distribution Revenues by Class as shown in the Cost Allocation Model (i.e., Totalling \$530,539 were determined). Please clarify the basis for the rates used.
- **Cost allocation model has been updated and corrected see Board Staff Supplemental responses.**

**Question #38**

**Reference:** VECC #20

c) The results for part (b) do not represent the MSC ceiling for each class, but rather just 120% of the current MSC value. Please correct the response.

	<b>Current</b>	<b>120%</b>	<b>MSC</b>
Residential	\$ 10.23	\$ 12.28	\$ 14.27
GS < 50 kW	\$ 19.13	\$ 22.96	\$ 29.81
GS > 50 to 499 kW	\$ 32.84	\$ 39.41	\$ 197.28
Sentinel Lighting	\$ 0.20	\$ 0.24	\$ 7.63
Street Lighting	\$ 0.12	\$ 0.14	\$ 0.12
Unmetered	\$ 9.07	\$ 10.88	\$ 9.01

d) Please provide a response to parts (g) and (h).

	<b>A</b>	<b>B</b>	<b>A+B</b>
	\$ 971,734.54	Transformer Allowance Recovery	
Residential	47.34% \$ 459,981.96		\$ 459,981.96
GS < 50 kW	19.39% \$ 188,452.55		\$ 188,452.55
GS>50 to 4999 kW	26.78% \$ 260,194.76	\$ 9,655.05	\$ 269,849.81
Sentinel Lighting	0.38% \$ 3,703.55		\$ 3,703.55
Street Lights	5.99% \$ 58,245.39		\$ 58,245.39
Unmetered	0.12% \$ 1,156.33		\$ 1,156.33
<b>Total</b>	<b>100.00% \$ 971,734.54</b>	<b>\$ 9,655.05</b>	<b>\$ 981,389.59</b>

	<b>Customers</b>	<b>Fixed %</b>	<b>Fixed Revenue</b>	<b>Fixed Charge</b>	<b>Consumption</b>	<b>Variable Revenue</b>	<b>Variable Charge</b>
Residential	1,414	50.2%	\$ 230,854.51	\$ 13.61	11,819,820	\$ 229,127.45	\$ 0.0194
GS < 50 kW	221	30.0%	\$ 56,620.20	\$ 21.35	5,388,897	\$ 131,832.35	\$ 0.0245
GS>50 to 4999 kW	17	15.5%	\$ 41,787.77	\$ 204.84	34,478	\$ 228,062.04	\$ 6.6147
Sentinel Lighting	38	0.0%	\$ -	\$ -	109	\$ 3,703.55	\$ 34.0189
Street Lights	709	7.6%	\$ 4,424.16	\$ 0.52	1,008	\$ 53,821.23	\$ 53.3941
Unmetered	11	3.1%	\$ 35.64	\$ 0.27	60,756	\$ 1,120.69	\$ 0.0184
<b>Total</b>			<b>\$ 333,722.28</b>			<b>\$ 647,667.31</b>	

	2010 Proposed			
	Fixed	%	Variable	%
Residential	\$ 13.61	50.2%	\$ 0.0194	49.8%
GS < 50 kW	\$ 21.35	30.0%	\$ 0.0245	70.0%
GS>50 to 4999 kW	\$ 204.84	15.5%	\$ 6.6147	84.5%
Sentinel Lighting	\$ -	0.0%	\$ 34.0189	100.0%
Street Lights	\$ 0.52	7.6%	\$ 53.3941	92.4%
Unmetered	\$ 0.27	3.1%	\$ 0.0184	96.9%

	2010 no % Change			
	Fixed	%	Variable	%
Residential	\$ 15.03	55.4%	\$ 0.0173	44.6%
GS < 50 kW	\$ 31.50	44.3%	\$ 0.0195	55.7%
GS>50 to 499 kW	\$ 65.20	4.9%	\$ 7.4409	95.1%
Sentinel Lighting	\$ 6.45	79.4%	\$ 7.0199	20.6%
Street Lights	\$ 5.87	85.8%	\$ 8.2024	14.2%
Unmetered	\$ 7.31	83.5%	\$ 0.0031	16.5%

	2010 No Fixed Change			
	Fixed	%	Variable	%
Residential	\$ 9.23	33.9%	\$ 0.0258	66.1%
GS < 50 kW	\$ 18.13	25.4%	\$ 0.0262	74.6%
GS>50 to 4999 kW	\$ 31.84	2.4%	\$ 7.6607	97.6%
Sentinel Lighting	\$ 0.21	2.5%	\$ 33.2597	97.5%
Street Lights	\$ 0.12	1.7%	\$ 56.9424	98.3%
Unmetered	\$ 9.11	103.7%	\$ (0.0007)	-3.7%

	2006 EDR			
	Fixed	%	Variable	%
Residential	\$ 9.07	55.4%	\$ 0.0097	44.6%
GS < 50 kW	\$ 17.81	44.3%	\$ 0.0096	55.7%
GS>50 to 4999 kW	\$ 31.28	4.9%	\$ 3.4052	95.1%
Sentinel Lighting	\$ 0.21	79.4%	\$ 0.3861	20.6%
Street Lights	\$ 0.12	85.8%	\$ 0.1701	14.2%
Unmetered	\$ 9.11	83.5%	\$ 0.0099	16.5%

### **Question #39**

**Reference:** VECC #22 and #23

- b) The Board Staff responses do not specifically address the issues raised in the VECC IRs. Please provide the requested information.
- ***Work is continuing on RTSR's and will be provided prior to conference.***

### **Question #40**

Reference: VECC #24 and #26

- b) Are the revised continuity schedules available? If yes, please provide. If not, please indicate when they are expected to be completed.
- ***The schedules will be provided prior to the settlement conference.***

**Question #41**

Reference: OEB Staff #11 b)

- a) Please provide an update on the expected delivery/in-service date for the bucket truck.
- ***Please see various responses to board staff supplemental interrogatories.***

**Question #42**

Reference: OEB 13 a) & d)

- a) Please provide the details supporting the revised 2010 Cost of Power expense of \$2,912,793 (per the electronic spreadsheet provided). For each cost component, please confirm if the rates used have changed from those shown in response to part (d).
- ***Please see the response to board staff supplemental interrogatories with respect to this issue.***
- b) What is the basis/source of the prices used for each cost of power component?
- ***The basis of the pricing is what Clinton Power was being charged at the time of the application and can be updated as required.***
- c) What portion of Clinton's 2009 kWh sales to each customer class are RRP vs. non-RRP?

	Non-RPP	RPP
RES	47.28%	52.72%
G<50	45.63%	54.37%
G>50	87.40%	12.60%
Sentinel	46.09%	53.91%
Unmetered	52.70%	47.30%
Streetlight	41.16%	58.84%

**Question #43**

**Reference:** OEB #23 d) and e)

- a) Please indicate the status of the preparation of the response to these interrogatories.
- ***Ongoing.***

**Question #44**

**Reference:** OEB #28

- a) Please confirm that there are no charges from EPTL included in the proposed revenue requirement for 2010.
- ***Not confirmed ETPL charges Clinton for Rate work, Regulatory work, engineering, and asset management.***

**Question #45**

**Reference:** OEB #56 b)

- a) Please indicate the status/results of Clinton's review.
- ***The review is ongoing.***

**Question #46**

**Reference:** OEB #30  
VECC #13 c)

- a) The file provided electronically in response to OEB Staff #30 indicates that all employee costs are capitalized. Please review and revise as necessary.