



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

**ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7**  
**Toronto Office: 34 King St E Suite 1102 Toronto Ont. M5C 2X8**

December 8, 2010

**VIA E-MAIL/RESS**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
27<sup>th</sup> Floor; 2300 Yonge Street  
Toronto, ON M4P 1E4

Dear Ms. Walli

**Re: Bluewater Power Distribution Corporation**  
**2011 IRM Adjustment (EB-2010-0065)**  
**Interrogatories of Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed VECC's interrogatories regarding the above Application.

Yours truly,

*Original signed*

Michael Buonaguro  
Counsel for VECC

Encl.

cc Ms. Leslie Dugas, Manager of Regulatory Affairs  
Bluewater Power Distribution Corporation  
[ldugas@bluewaterpower.com](mailto:ldugas@bluewaterpower.com)

**Bluewater Power Distribution Corporation  
2011 IRM Adjustment (EB-2010-0065)  
VECC IRs**

**Smart Meter Funding Rate Adder 2011/12**

VECC IR #1

References: i) OEB Guideline G-2008-0002:

ii) OEB Filing Requirements for Smart Meter Investment Plans,  
October 26, 2006

iii) Managers Summary and Application Tab 6

a) Confirm that Guideline G-2008-0002 has not superseded the Filing Requirements for Smart Meter Investment Plans, October 26, 2006.

b) Confirm that paragraph 7 of the Filing Requirements specifies that

7. Specifically, and in as much detail as possible, please provide the following information for your planned implementation of the SMIP:

- the number of meters installed by class and by year, both in absolute terms and as a percentage of the class;
- the capital expenditures and amortization by class and by year;
- the operating expenses by class and by year;
- the effect of the SMIP on the level of the allowance for PILs.

c) Did Bluewater File its SMIP in accordance with the Filing Guidelines? Please elaborate.

d) Has Bluewater kept records by class as required by the Filing Guidelines and are accounts 1556 and 1555 segregated by rate class? Please elaborate.

VECC IR# 2

References: i) Managers Summary and Application Tab 6

ii) OEB SM Worksheets Sheets 7& 8

Preamble: In its EB-2010-0209 Decision The Board Stated

“ the Board finds that PowerStream’s original cost allocation methodology is reasonable and based on the principle of cost causality”

- a) Provide the *average unit capital costs* (procurement and installation) and total capital costs for each of residential and GS<50kw meters to the end of 2010.
- b) Provide an estimate of the SM rate adder revenue collected from each of the Residential and GS<50kw classes to the end of 2010. (average #customers \* SM adder rate/metered customer/month). Prorate the carrying costs and reconcile to OEB Worksheet 7.
- c) Provide the estimated 2011/12 total capital costs (procurement and installation) for each of the Residential and GS<50 kw classes.
- d) Calculate class-specific proxy 2011/12 rate adders using capital cost as the cost driver for allocating the 2011/12 Revenue Requirement.(Sheet 8). The class specific rate adders should add to the same total 2011/2012 SM revenue as that projected from the aggregate SM rate adder of \$2.95 /customer/mo (Worksheet 8).
- e) Why is Bluewater applying for an aggregate 2011 SM Funding Adder of \$2.00/customer/mo rather than the 2.95/mo calculated per Sheet 8? Please explain.

## **LRAM**

### **VECC IR# 3**

References: Managers Summary Tab 7- Burman Report Attachments A & B

Preamble: OPA sponsored programs also represent lost revenue through their successful implementation and are included in LRAM calculations.

- a) Provide details of the OPA EKC campaigns from 2006-2009 that add to the data shown in Attachment A & B
  - i. # units
  - ii. unit and total kwh savings,
  - iii. operating hours,
  - iv. lifetime and
  - v. free ridership
 for each year 2006-2009
- b) Reconcile to the Residential lost revenue for each year and the Total Lost Revenue.
- c) Provide a Copy/extract of the OPA Results for Bluewater Residential Program Savings 2006-2009.

## **Revenue Cost Ratio Adjustment**

VECC IR# 4

References: Revenue Cost Ratio Adjustment Workform, Sheet C1.3

- a) Please explain why, for the Large Use class, the kW's eligible for the transformer ownership allowance (426,140 kW) exceed the total billed kW's for the Large Use class (421,890 kW).