



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

**ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7**

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: [piac@piac.ca](mailto:piac@piac.ca). <http://www.piac.ca>

Michael Buonaguro  
Counsel for VECC  
(416) 767-1666

December 22, 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 (VECC)**  
**Notice of Intervention: EB-2010-0139**  
**NORFOLK – 2011 Electricity Distribution Rate Application**

Please find enclosed the interrogatories of VECC in the above-noted proceeding.

Thank you.

Yours truly,

Michael Buonaguro  
Counsel for VECC  
Encl.

**NORFOLK POWER DISTRIBUTION INC.**  
**(NPDI)**  
**2011 RATE APPLICATION (EB-2010-0139)**  
**VECC'S INTERROGATORIES – RE: PRELIMINARY ISSUE**

**QUESTION #1**

**Reference:** Exhibit 1/Tab 2/Schedule 1, page 2  
2011 Revenue Requirement Work Form

- a) Please provide NPDI's actual return on deemed equity for 2008 and 2009 as well as its projected return on deemed equity for 2010. For each of these years please provide supporting schedules comparable to Sheets 1, 4 and 5 (data column #1) from the Revenue Requirement Work Form.

**QUESTION #2**

**Reference:** Exhibit 1/Tab 2/Schedule 1, pages 2-3

- a) Please indicate 2011 average fixed asset value for the Bloomsburg Transformer Station that is included in NPDI's proposed 2011 rate base.
- b) What was the 2008 fixed asset value for the Bloomsburg Transformer Station that was included in NPDI's approved 2008 rate base (and 2008 approved rates)?
- c) Please provide a schedule that sets out:
- NPDI's forecast 2008 Retail Transmission Connection charges as approved in EB-2007-0753.
  - NPDI's forecast 2008 Retail Transmission Connection charges assuming the Bloomsburg Transformer Station was in-service as currently projected for 2011.

### **QUESTION #3**

**Reference:** i) Exhibit 1/Tab 2/Schedule 1, page 4

ii) OEB Filing Requirements for Transmission and Distribution Applications, Chapter 3, July 9, 2010.

iii) OEB Letter, January 29, 2009 (EB-2009-0028)

- a) Please confirm that distributor is not required to include an LRAM/SSM application as part of an IRM-based rate application and that such a filing is at the discretion of the distributor.
- b) Please confirm that Smart Meter Cost Recovery Applications do not form part of a standard IRM-based application.
- c) In January 2009 the OEB issued a letter regarding the electricity distributors it proposed for re-basing in 2010 and 2011 and requested comments. Did NPDI provide any comments to the OEB indicating its interest in submitting a cost of service rebasing application for 2011 in response to this letter? If yes, please provide a copy. If not, why not?
- d) Did NPDI complete its installation of smart meters by year end 2009 such that all smart meter costs could be audited and included in rate base as part of its 2011 Application?