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December 15, 2007

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

Dear Ms. Walli:

Re: Oshawa PUC Networks Inc. (ED 2002-0560)

Board File Number EB-2007-0710

Please find attached Oshawa PUC Networks Inc.'s response to the Interrogatories posed by AMPCO in the above noted proceeding. Oshawa PUC Networks Inc. has forwarded this response to AMPCO.

Yours truly,

Original signed by

Michael Chase Corporate Controller

#### EB-2007-0710

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 Oshawa PUC Networks Inc. for an Order or Orders approving or fixing just and reasonable rates and other charges for the distribution of electricity commencing May 1, 2008.

## Interrogatories of the

## Association of Major Power Consumers in Ontario

#### Revenue

### 1. Reference Exhibit 3/Tab 2, Schedule 4/Page 3

Please confirm that the single streetlight customer of OPUCN is the Corporation of the City of Oshawa.

The Corporation of the City of Oshawa is the single streetlight customer of OPUCN.

#### 2. Reference Exhibit 3/Tab2/Shcedule 9/ Pages 1-3

These charts of average historical consumption are difficult to understand and reconcile. For example, the weather normalization factor for each year appears constant within a customer class, yet logically weather normalization should vary each year. Also, three classes show the same numbers for every year (within the class). Finally, the residential numbers do not seem to match with the data in the preceding charts, such as the summary in Schedule 8. Please reconcile or explain.

The three classes which show the same numbers each year (the Sentinel lights, General Service 1000 – 5000 kW, and Large User classes) are load customers and as such are not greatly affected by normalization, which is based on consumption. In addition, the number of customers in each class has remained stable over the period in question.

Schedule 8 uses data a supplied from the HONI weather normalization study, undertaken as part of the OEB Cost Allocation study. These numbers do not reflect an appropriate load forecast. This schedule reflects the difficulties

inherent in using the HONI normalized figures for purposes of this rate application.

# 3. Reference Exhibit 3/Tab 3/ Schedule 3/page 2

This chart appears to calculate normalized consumption and the resulting normalized revenue, by customer class. Yet for residential customers, normalized consumption is higher than actual by about 1%, while normalized revenue is lower than actual revenue by about 4\$. Similarly, normalized consumption for large users are identical, yet normalized revenue is shown as lower than actual. Please explain the derivation of the calculated normalized values for revenue and why they differ from consumption normalization.

The normalized values were calculated by applying the distribution rate approved in EDR 2006 to the normalized consumption figures for the calendar year 2006. The 2006 rate year started on May 1, 2006 and the 2005 rates were in effect until that time. The EDR 2006 rates were lower than the approved rates which were in effect for the 2005 rate year. The actual figures reflect the fact that actual billing in 2006 was at 2005 rates until the end of April 2006 and at the lower rates which came into effect in May of 2006 for the rest of the year.

#### 4. Reference Appendix D – Asset Condition Assessment

Please provide any previous asset condition assessment study than may have been conducted for Oshawa PUC Networks Inc.

OPUCN does not have any previous asset condition assessment studies available.

#### 5. Reference Appendix E – Cost Allocation

Please indicate how OPUCN intends to implement the Board decision on application of cost allocation in EB-2007-0667.

Please see the answer to the Board Interrogatory Question 62 for the OPUCN proposal for the application of the Board decision on cost allocation.