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September 20, 2011

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-2011-0054

Please find enclosed Technical conference questions from VECC in the above-noted proceeding.

Thank you.

Yours truly,

Michael Buonaguro
Counsel for VECC
Encl.

REQUESTOR NAME:	**VECC**
INFORMATION REQUEST ROUND NO:	**#2 Technical Conference**
TO:	**Hydro Ottawa Limited**
DATE:	**September 19, 2011**
CASE NO:	**EB-2011-0054**
APPLICATION NAME:	**2012 Electricity Distribution Rate Application**

ISSUE 1: GENERAL

1) Issue 1.2: **References: Exhibit K1, Issue 1.2 Interrogatory #10 (VECC #6)**
Preamble: The purpose of the interrogatory was to solicit information regarding the link between the asset management plan and service quality indicators.

a) Are any service quality indicators or line loss targets utilized as metrics in developing the asset management plan or measuring its success?

b) If not, please explain if there impediments to incorporating metrics into the asset management plan and assessment of the plan.

c) If metrics are not used to assess the effectiveness of the asset management plan please indicate how Hydro Ottawa measures the efficiency (success or failure) of the plan.

d) Has Hydro Ottawa identified pole failure as a source of service quality degradation? If yes please provide the study supporting how changes to the pole replacement program will improve service quality.

ISSUE 2: RATE BASE

2) Issue 2.1: Is the proposed rate base appropriate? **Reference: Exhibit K2, Issue 2.1, Interrogatory #2 (Board Staff IR #8)**.

a) Can Hydro Ottawa provide the source for its statement that the test for inclusion in rate base is “used ***or*** useful” (as opposed to Board Staff’s question which uses the term “used ***and*** useful”.

b) Can Hydro Ottawa provide a precedent Board decision for the allowance of an asset (building, electrical circuit, pipeline etc.) being allowed into rate base prior to it being used for the purpose of serving customers?

3) Issue 2.1: **Reference Exhibit K2, Issue 2.1, Interrogatory #5(d) (Energy Probe IR #8).**

a) What are the incremental revenues expected from the leasing of the new facilities? When are these revenues expected to begin?

4) Issue 2.1: **Reference Exhibit K2, Issue 2.1, Interrogatory #23 (VECC IR# 23).**

a) Please explain the calculation (methodology) of the Cost Performance Index described in the interrogatory response.

5) Issue 2.1: **Reference Exhibit K2, Issue 2.1, Interrogatory #26 (VECC IR #11).**

a) Please update the final page of the IM/IT Plan & Priorities to show: 2011 planned and actual to-date spending and 2012. If necessary please add a column for amounts forecast to be spent on each project subsequent to 2012.

b) In an updated table please add a column which shows whether the capital expenditures are assigned to Distribution Capital - Demand, Sustainment or General Plant (or other category as necessary).

c) Please explain the apparent discrepancy between the IM/IT Plan & Priorities estimates (shown on the final page of the plan) and the figures shown at Exhibit B1, Tab 2 Schedule 6, page 7 for the CC&B Transition (i.e. $7m vs. 6.9m for 2011 and $7.7m vs. $7.8 for 2012).

6) Issue 2.1: **Reference Exhibit K2, Issue 2.1, Interrogatory #27; Exhibit K2, Issue 2.2, Interrogatory #10 (CCC IR #10)** *Preamble: The purpose of VECC interrogatory #12 was to understand the variation in fleet acquisitions*.

a) Please provide a copy of the multi-year replacement plan referred to in the response to this interrogatory.

7) Issue 2.1: **Reference Exhibit K2, Issue 2.1, Interrogatory #29 (VECC IR #14).**

a) How many LTLT customers will be connected in 2012?

b) How many customers have been connected since (and including 2008)?

c) How many customers will be left to connect after 2012 and what is the estimated cost of connecting these final LTLT customers?

8) Issue 2.2: Is the working capital allowance appropriate? **References: K2, Issue 2.2, Interrogatory #19 (VECC IR #17)**

a) Is the transition to monthly billing entirely based on the introduction of the new CIS? That is, if the CIS implementation is delayed will the implementation of monthly billing also be delayed?

9) Issue 2.3: Is the capital expenditure appropriate? **Reference K2, Issue 2.3, Interrogatory #12 (SEC IR # 18).**

a) At page 7 of Attachment 2, Table 1 of this interrogatory the total project cost for CIS upgrade was estimated as $7,428k. In the IM/IT Plan at K2, Issue 2.1, Interrogatory #26, it appears the equivalent amounts for CC&B are 7,000k in 2011 and 7,700k in 2012. Please reconcile this apparent difference.

10) Issue 2.3: **References Exhibit K2, Issue 2.3, IR #8 (SEC #34)**

a) What was the adjustment to Hydro Ottawa's Bad Debt expenses made due to the elimination of security deposits (forecast 2008 compared to 2012).

11) Issue 2.3: **References Exhibit K2, Issue 2.5, Interrogatory #1 (Board Staff #17)/ Exhibit B5, Tab 4 Schedule 3; Exhibit B1, Tab 2, Schedule 2, Attachment P, page 14.** *Preamble: At B5-T4-S3 Hydro Ottawa identifies $2.5 million in capital expenditures related to the Lisgar TS*..

a) Please describe the purpose and nature of this project.

b) Is the project still proceeding in light of Hydro One's comments to Hydro Ottawa's Green Energy Plan (**K2-Issue 2.5-IR #1**)?

ISSUE 3: LOAD FORECAST AND OPERATING REVENUE

12) Issue 3.1 – Is the load forecast methodology including weather normalization appropriate? **References Exhibit K3, Issue 3.1, Interrogatory #3 (Staff #25) /Exhibit K3, Issue 3.1, Interrogatory #11 (VECC #27 b)**

a) What was the loss factor (i.e. purchased energy/delivered energy) used to convert the 2011 and 2012 purchase forecasts into sales forecasts and was the same loss factor used for each month?

b) How was this loss factor determined?

c) What was the average loss factor of the period 1997-2010? (Note: If the historic data is not available for the entire period please provide the average loss factor based on the historic years for which data is available).

13) Issue 3.1: **References: Exhibit K3, Issue 3.1, Interrogatory #4 (Staff #26) /Exhibit K3, Issue 3.1, Interrogatory #11 (VECC #27 b).**

a) Please confirm that the customer class forecast sales values shown in VECC #27 are the adjusted values calibrated to match the total system forecast.

b) With respect to VECC #27, please provide a revised table for 2012 that includes January (i.e., month #1).

c) With respect to the calibration factor, how was this factor applied (e.g., was the same factor applied to all customer classes)? Was the factor multiplied by/divided into the class forecasts to obtain the adjusted values?

14) Issue 3.1: **References: Exhibit K3, , Interrogatory #6 (Staff #28) / Exhibit K3, Issue 3.1, Interrogatory #11 (VECC #27 a) / Exhibit C1, Tab 1, Schedule 1, Appendix X.** *Preamble: Many of the equations estimated include variables that combine temperature and other economic parameters. For example the equation for Residential sales includes a variable that combines Real Personal Income and Cooling Degree Days and another that combines Real Personal Income and Heating Degree Days. Similarly, the equations for the GS and Large Use classes include equations that combine Gross Domestic Product and Cooling/Heating Degree Days.*

a) Please explain fully how each of these "combined" variables was constructed.

b) Please explain why a "combined variable" was used as opposed to including the economic and weather variables in the equation separately.

c) With respect to the Residential Class, please re-estimate the equation with CDD. HDD and PDI being included as separate explanatory variables (lagged as per the original specification) and provide the following:

- The results of the estimation in a format similar to that used Exhibit C1, Tab 1, Schedule 1, Appendix X, page 4 of 20.
- The forecast results for 2011 and 2012 based on this new equation as compared to the equation as estimated by Hydro Ottawa (Note: Both results should be before any calibration is done to match the overall system forecast).

15) Issue 3.1**: References: Exhibit K3, Interrogatory #6 (Staff #28) Exhibit K3, Issue 3.1, Interrogatory #11 (VECC #27 a)) Exhibit C1, Tab 1, Schedule 1, Appendix X.**

a) With respect to the equation developed for GS<50 kW Customer Count. Please explain why (per VECC #27, Attachment 1, page 1) the predicted number of Residential Customers from the Residential Customer Count equation was used as the explanatory variable as opposed to the actual number of residential customers when estimating the customer count model.

b) Many of the binary flags included in the equations have t-statistics that are not statistically significant. Please explain why these variables were retained in the final equations used for forecasting.

c) With respect to GS>50<1000 Non Interval Class Sales, please explain why in Appendix X (page 8) and VECC #27, Attachment 1 (page 3) historic sales for the class is included as an explanatory variable.

d) With respect to GS>50<1000 Non Interval Class Sales, please explain why the explanatory variables for the model differ as between those filed in i) Appendix X (page 8) & VECC #27, Attachment 1 (pages 2-3) and ii) those set out in Staff #28, Attachment 1 (page 5). The former appear to use historic sales as an explanatory variable whereas the latter uses GDP and HDD/CDD based variables.

e) With respect to GS>50<1000 Interval Class Sales, please explain why in Appendix X (page 10) and VECC #27, Attachment 1 (page 3) historic sales for the class is included as an explanatory variable.

f) With respect to GS>50<1000 Interval Class Sales, please explain why the explanatory variables for the model differ as between those filed in i) Appendix X (page 10) & VECC #27, Attachment 1 (page 3) and ii) those set out in Staff #28, Attachment 1 (page 10). The former appear to use historic sales as an explanatory variable whereas the latter uses GDP and HDD/CDD based variables.

g) Please confirm that titles for the table in Appendix X, pages 11-12 should read GS>1000<1500 kW. If not, please reconcile table titles on this page and the other pages in Appendix X with the list of customer class models set out at Exhibit C1, Tab 1, Schedule 1, page 9, lines 12-21.

h) Please confirm that the titles for the first two schedules on page 4 of VECC #27, Attachment 1 should read GS>1000<1500 kW.

i) Please confirm that the title for Staff #28, Attachment 1, page 14 should be GS>1000<1500 kW.

j) Please confirm that with respect to Staff #28, page 2, line 8 – "GS>1500<5000" should be replaced by "GS>1000<1500 kW".

k) With respect to GS>1000<1500 Class Sales, please explain why in Appendix X (page 12) and VECC #27, Attachment 1 (page 4) historic sales for the class is included as an explanatory variable.

l) With respect to GS>1000<1500 Class Sales, please explain why the explanatory variables for the model differ as between those filed in i) Appendix X (page 12) & VECC #27, Attachment 1 (page 4) and ii) those set out in Staff #28, Attachment 1 (page 14). The former appear to use historic sales as an explanatory variable whereas the latter uses GDP and HDD/CDD based variables.

m) With respect to GS>1500<5000 Class Sales, please explain why in Appendix X (page 14) and VECC #27, Attachment 1 (page 4) historic sales for the class is included as an explanatory variable.

n) With respect to GS>1500<5000 Class Sales, please explain why the explanatory variables for the model differ as between those filed in i) Appendix X (page 14) & VECC #27, Attachment 1 (pages 4-5) and ii) those set out in Staff #28, Attachment 1 (page 20). The former appear to use historic sales as an explanatory variable whereas the latter uses GDP and HDD/CDD based variables.

o) With respect to the Large Use Class Sales, please explain why in Appendix X (page 16) and VECC #27, Attachment 1 (page 5) historic sales for the class is included as an explanatory variable.

p) With respect to the Large Use Class Sales, please explain why the explanatory variables for model differ as between those filed in i) Appendix X (page 16) & VECC #27, Attachment 1 (page 5) and ii) those set out in Staff #28, Attachment 1 (page 25). The former appear to use historic sales as an explanatory variable whereas the latter uses GDP, Days and CDD based variables.

q) If any changes to the class forecasts are required as a result of the above reconciliations, please provide updated versions of Tables 8, 9, 13 and 14 from Exhibit C1, Tab 1, Schedule 1.

16) Issue 3.1: **References: Exhibit K3,Interrogatory #11 (VECC #27 b))Exhibit K3, Issue 3.1, Interrogatory #5 (Staff 27)Exhibit C1, Tab 1, Schedule 1, page 11 (Sept. Update).**

a) Please provide a revised response to Staff #27 based on the updated load forecast (i.e., with the new suite metering assumptions). In doing so please show separately the adjustments made for CDM and Suite Metering.

17) Issue 3.1: **References Exhibit K3, Issue 3.1, Interrogatory #7 (EP #24)**

a) The response contains a number of pages that were not in the original Appendix X (e.g. pages 18, 21, 25 and 29). For each such page please indicate the customer class to which the regression analysis applies.

18) Issue 3.1: **References: Exhibit K3, Issue 3.1, Interrogatory #12 (VECC #28 a).**

a) For each demand billed customer class, please provide the model formulation and the resulting regression values and statistics.

19) Issue 3.2 – Are the proposed customers/connections and load forecasts (both kWh and kW) for the test year appropriate? **References: Exhibit K3, Issue 3.2, Interrogatory #5 (VECC #29) / Exhibit C1, Tab 1, Schedule 1, page 8 (Original & Update).**

a) How many GS>50<1499 customers have been converted to Residential in 2011 to date and what is the resulting number of new residential customers?

b) The original evidence called for 2,310 additional residential customers in 2011 and 739,200 kWh of additional residential sales due to suite metering conversions. The new evidence calls for 500 conversions and 900,000 kWh. Please explain why the kWhs have increased in the update although the number of customers converted has decreased.

20) Issue 3.3 – Is the impact of CDM appropriately reflected in the load forecast? **References: Exhibit K3, Issue 3.3, Interrogatory #5 (VECC #31 b) /Exhibit K3, Issue 3.3, Interrogatory #1 (Staff #30) / Exhibit K.3, Issue 3.3, Interrogatory #2 (EP #28).**

a) Please confirm that in the response to VECC #31 b) both the Total Annual Saving and the Total Cumulative Savings for 2014 should read 375.1 GWh.

b) With respect to VECC #31 b), please explain why both the Total Annual Savings and the Total Cumulative Savings for each year are the same. Why wouldn't the Total Cumulative Savings be as follows: 2011 – 60.016 GWh; 2012 – 225.06 GWh; 2013 – 498,883 GWh and 2014 – 600.16 GWh?

c) Does Hydro Ottawa agree that its Energy Savings target of 374.73 GWh represents the total cumulative savings achieved over the four year period 2011-2014 from CDM programs offered in those years as opposed the savings persisting in 2014 from CDM programs offered over the four periods?

21) Issue 3.4: **References: Exhibit K3, Issue 3.4, Interrogatory #6 (VECC #32 a) Hydro Ottawa, Conservation and Demand Management 2008 Annual Report, Appendix A and Appendix D.**

a) Please confirm that the 77,923 MWh shown as the impact of 2008 3rd Tranche programs in 2008 is really the total impact of 3rd Tranche programs offered over the period 2005-2008.

b) Please confirm that, as per Appendix A of Hydro Ottawa's 2008 CDM Annual Report, the savings in 2008 from 2008 3rd Tranche programs was 12,170 MWh.

c) Based on the forgoing responses please provide an updated response to VECC #32 a).

d) Please confirm that Hydro Ottawa has not undertaken/commissioned any assessments as to the persistence of savings achieved by its 3rd Tranche CDM programs beyond the year in which they were introduced? If so, please provide the analysis and the projected persistence (through to 2012) for each year's 3rd Tranche programs.

22) Issue 3.4 – Is the proposed forecast of test year throughput revenue appropriate? **References**: **Exhibit K3, Issue 3.4, Interrogatory #1 (VECC #33) / Exhibit F1, Tab 1, Schedule 2, page 2 / Exhibit C1, Tab 1, Schedule 1, page 8 (Original and Updated)** *Preamble: The only apparent revision that would affect the forecast of 2012 revenue at existing rates is the reduction in the residential conversions forecast for 2011-2012 due to residential suite metering. These reductions appear to result in following for 2012 – a reduction of in residential customers of 1,810 and a reduction in residential sales of 15,584,000 kWh*.

a) The response to VECC #33 and the original revenue at existing rates ($146.865 M per Exhibit F1) suggests that the reduction in conversions reduces revenue at existing rates for 2012 by $5.6 M (i.e., $146.865 vs.

$141.223). Even ignoring the offsetting increase in GS sales, this difference is substantially higher than what results from applying the 2011 residential rates to the change in residential sales and customer count. However, it is also noted that the original $146.865 M appears to have included revenues from the smart meter rate adder. Given the foregoing, please reconcile the $5.6 M difference.

23) Issue 3.4: **References: Exhibit K3, Issue 3.4, Interrogatory #1 (VECC #33) / Exhibit H1, Tab 2, Schedule 1, Attachment AL, page 47, (Updated).**

a) Please confirm that the TOC for 2012 is $1,161.

b) Based on this TOC value, please confirm that the 2012 revenue at current rates is $141,213.6 M and not $141, 223 as shown in VECC #33 c).

24) Issue 3.5: Is the test year forecast of other revenue appropriate? **References: Exhibit K3, Issue 3.5, Interrogatory #9 (VECC #35).**

a) Where are the revenues from the monthly service charge for micro-fit customers included in Exhibit C2, Tab 1, Schedule 1, Table 2?

ISSUE 4: OPERATING COSTS

25) Issue 4.1: Is the overall OM&A forecast appropriate? **Reference Exhibit K4, Issue 4.1 IR#24 (VECC IR #38).**

a) In respect to response (i), how many staff were added in support of load dispatching and for what reasons?

26) Issue 4.4: Are the compensation costs appropriate? **Reference Exhibit K4, Issue 4.4, IR # 26 (VECC #42).**

a) In respect to response (b) – please provide a list of the quantitative metrics used to determine incentive pay?

ISSUE 6: SMART METERS

27) Issues: 6.1 Is the proposed elimination of the smart meter rate adder and the inclusion of the smart meter costs in the 2012 revenue requirement appropriate? Issue 6.2 Is the proposal not to dispose of the balances in variance accounts1555 and 1556 appropriate? **References: Exhibit I2, Tab 1, Schedule 1, page 1 Tables 1-3: Exhibit K6 Issue 6.1 Interrogatory response #6 VECC Question 46** *Preamble: VECC IR#46 requested Ottawa Hydro to "Provide a table that shows by class, the AMCD Capital*

invested, the revenue requirement and SM funding adder revenue collected from 2006-2010."

a) Clarify how in the Response the data in the Table provided for Capital Additions were derived e.g. unit meter cost plus installation cost for each class.

b) Provide the per meter Unit capital cost (including installation) for each class, and reconcile to the response to part b) of VECC IR#46.

c) Provide a table that shows the total revenue requirement by class using Capital cost as the cost driver to apportion the Total Revenue Requirement.

28) Issue 6.2 **References: Exhibit I2, Tab 1, Schedule 1, page 1 Table 5: Exhibit I1, Tab1 Schedule 2 (updated): IR#2 Board Staff Question 55.**

a) Provide the calculation of the Smart Meter Disposition Rate Rider per class if the forecast of capital and operating costs to end of 2011 was approved for disposition and recovery.

b) Provide details of a proposed adjustment of the disposition rate rider or current rate adder to address the over-collection from customers up to December 31 2012.

ISSUE 7: COST ALLOCATION

29) Issue 7.1 – Is Hydro Ottawa's cost allocation appropriate? **References: Exhibit H1, Tab 2, Schedule 1, Attachment AL, pages 47 and 51 (Updated) / Exhibit G1, Tab 1, Schedule 1, Attachment AI, Sheet O1 (Updated) / Exhibit G1, Tab 1, Schedule 1, Attachment AJ, pages 2-3 (Updated).**

a) Please explain why the revenues at existing rates by customer classes set out in Sheet O1 (Updated Cost Allocation) don't match the revenues set out in Attachment AL, page 51, with revenues for the GS>50<1500; GS>1500<5000 and Large Use classes reduced by the TOC per Attachment AL., page 47.

b) Please re-do the Cost Allocation Model and provide Sheet O1 based on the customer class revenues at current rates as reported in Attachment AL, page 51 with reductions for the TOC as appropriate.

c) Columns 7B and 7C in Attachment AJ do not match the revenue at current rates and the status quo revenue values reported in Attachment AI - Sheet O1. Please revise Attachment AJ in order to reconcile with the Cost Allocation Sheet O1 results from part 2 above.

d) The totals for Columns 7C and 7D do not match. As indicated in the Schedules footnotes – both should equal the Base Distribution Revenue Requirement. Please revise accordingly.

e) The Status Quo ratios reported in part (c) of Attachment AJ, page 3 do not match those from the Cost Allocation Model (Attachment AI, Sheet O1). Please review and revise as required using the results from part 2 above.

ISSUE 8: RATE DESIGN

30) Issue 8.1 – Are the fixed to variable splits for each class appropriate? **References: Exhibit K8, Issue 8.1, Interrogatory #2 (VECC #52 b).**

a) The quoted Board policy only states that distributors whose current monthly service charges are above the ceiling are not required to reduce them. However, Hydro Ottawa is proposing to increase the monthly charges for these classes even though the current 2011 charges exceed the ceiling based on 2012 costs. Please explain how this increase is consistent with the Board's stated policy.

31) Issue 8.1: **Reference: Exhibit K8, Issue 8.1, Interrogatory #2 (VECC #53).**

a) With respect to VECC #53 b), the original question asked that the fixed-variable split for each class be calculated based on 2012 revenues at existing rates, with the variable revenues reduced by the TOC in the appropriate classes. The response based the analysis on the proposed rates for 2012. Please re-do the response as per the original question.

b) With respect to VECC #53 c), the response provided only shows the Revenue Responsibility of each class as established by the Cost Allocation model. It does not set out the proposed Service Revenue to be recovered from each class based on the proposed revenue-cost ratios for each class. Please respond to the original question by including the proposed revenue to cost ratios for each class and the resulting allocation of the Service Revenue Requirement to classes.

c) Based on the results to the first two parts of this question please re-do the responses to VECC #53 d) and e).

32) Issue 8.3 – Are the proposed LV rates appropriate? **References: Exhibit K8, Issue 8.1, Interrogatory #1 (EP #60) Exhibit K8, Issue 8.1, Interrogatory #2 (VECC #54).**

a) Please confirm that i) the HON's ST charges for January to March 2010 are based on rates effective May 1, 2009 and ii) HON's ST charges for January to March 2011 are based on rates effective January 1, 2011. If the case, please confirm that the resulting 15% increase in charges represents the effect of the rate increases implemented for both 2010 and 2011.

b) Please re-do the response to VECC #54 where the 2010 charges for each month are based on HON's ST rates effective May 1, 2010 (per the response to EP #60).

ISSUE 10: LOST REVENUE ADJUSTMENT

33) Issue 10.1 – Is the proposal related to LRAM appropriate? **References: Exhibit K10, Issue 10.1, Interrogatory #1 (VECC #57).**

a) Please revise Table 1 in the response to reflect any changes necessary to reconcile with the response to Technical Conference Question # 21 above.

b) Based on the rates that were in effect for the calendar years 2008-2010 and the adjustment for CDM included in the 2008 approved Load Forecast, please provide a schedule that sets out the lost revenue for 2008, 2009 and 2010 associated with the 2008 approved CDM adjustment.

c) Based on the rates that were in effect for 2008-2010 and the actual savings in 2008-2010 associated with the 2008 CDM programs, please provide a schedule that calculates the actual lost revenue in each of the three years due to the 2008 CDM programs.

34) Issue:10.1: **Reference: Exhibit I3, Tab 1, Schedule 1, page 3/ K10 Issue 10.1, Interrogatory #2 (VECC #58)** *Preamble: The OPA has provided Hydro Ottawa with the verified results for OPA funded programs for 2009. Ottawa has updated the LRAM claim to include Preliminary 2010 results for OPA Programs*

a) When will OPA **Final** results for 2010 Programs be available and how will this affect the LRAM and Load forecast?

35) Issue 10.1: **Reference: Exhibit I3, Tab 1, Schedule 1 / Exhibit K10, Issue 10.1, Interrogatory #2 (VECC #58)** / *Preamble: VECC at part(f) of the interrogatory requested that Ottawa Hydro adjust the LRAM claim as necessary to reflect the measure lives (and Unit savings) for any/all measures that have expired starting in 2010. The response was that "the LRAM claim has already been adjusted to reflect the Measure lives for any/all measures that have expired starting in 2010."*

a) Please provide details of those adjustments in particular Residential mass market measures including CFLs, SLEDs and PTs.

b) Reconcile to the persistence data provided in response to VECC Question 57 Table 2.