



October 26, 2011

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

Re: West Coast Huron Energy Inc.  
Application to Recover Costs Caused by an F3 Tornado  
AMPCO Interrogatories  
Board File No. EB-2011-0335

Dear Ms. Walli:

Pursuant to Procedural Order No. 1 dated October 17, 2011, attached please find AMPCO's interrogatories in the above proceeding.

Please do not hesitate to contact me if you have any questions or require further information.

Sincerely yours,

*(ORIGINAL SIGNED)*

Adam White  
President  
Association of Major Power Consumers in Ontario

Copy to: West Coast Huron Energy Inc.

**EB-2011-0335**  
**West Coast Huron Energy Inc.**  
**Tornado relief Rate Adder Application**  
**AMPCO Interrogatories**

**Interrogatory #1**

**Ref:** Exhibit 1, Tab 1, Schedule 5, Pages 1-2

West Coast Huron states that casualties to the electricity distribution system include infrastructure damage, loss of distribution building and significant loss of revenue from impacted commercial and residential customers. West Coast has estimated that its infrastructure loss is approximately \$1.5 M net of any insurance claims. West Coast Huron also estimates that its revenue loss is primarily the commercial revenue stream and may be \$0.5 M. West Coast proposes that the Board allow the collection of \$2.4 M (which includes estimated carrying costs at 4% per annum for five years) from all customers over an approximate five year time frame ending December 31, 2016.

- a) Please provide a detailed breakdown of the items that make-up the \$2.4 M and show loss of revenue by customer class. Provide a calculation and explanation of the loss in revenue for each rate class.
- b) Please provide West Coast Huron's Board Approved Distribution Revenue Requirement from 2008 to 2011.

**Interrogatory #2**

**Ref:** Exhibit 1, Tab 1, Schedule 5, Page 1

West Coast Huron indicates that "While and after West Coast Huron is recovering from this disaster it is readily apparent that the utilities financial position is in dire strait." West Coast Huron is requesting the Board's approval of a "Tornado Relief Funding Adder" to cushion cash flow until such time that the utility can determine its true financial position.

- a) Please provide a copy of West Coast Huron's most recent financial report including cash flow statements.
- b) Please provide any updates to this information to help explain West Coast Huron's current financial position.
- c) When and how does West Coast Huron expect to determine its true financial position?

**Interrogatory #3**

**Ref:** Exhibit 1, Tab 1, Schedule 5, Page 2

West Coast Huron requests approval of a "2011 Tornado Relief Costs" Account 1572 sub-ledger account to record incremental costs incurred to restore the electrical system, net of any recoveries from third parties such as insurance or other forms of contributions received.

- a) Please provide a breakdown of the types of capital and non-capital costs expected to restore the system that would be recorded in this account.
- b) Please confirm that the costs will be incremental to those already being recovered in rates.
- c) Please report on any costs currently recorded in this account.

**Interrogatory #4**

**Ref:** Exhibit 1, Tab 1, Schedule 5, Page 3

West Coast Huron is and continues to explore all other options for recoveries, such as federal and provincial aid, insurance claims and other forms of assistance.

- a) Please provide a summary of the federal and provincial aid available.
- b) Please identify and explain the federal and provincial aid that West Coast Huron has currently applied for or proposes to apply for including an estimate of what could be covered and the date a response is expected.
- c) What other forms of assistance exist?
- d) What other forms of assistance is West Coast Huron currently accessing or proposing to access? Please discuss.
- e) Please provide detailed information on the insurance claims filed or to be filed by West Coast Huron including amounts and the status of each claim.
- f) Has West Coast Huron received any confirmation of relief assistance to date?
- g) Was the distribution building insured? If so, please provide details on the insurance.

**Interrogatory #5**

**Ref:** Exhibit 1, Tab 1, Schedule 5, Page 2

West Coast Huron proposes that the allocated recovery amount be applied as a fixed customer charge for 63 months based on reported 2010 Distribution Revenue as reported to the Board via RRR filing.

- a) Please explain the rationale for using a fixed customer charge for the funding adder and 2010 Distribution Revenue as the allocator.
- b) Please provide the current customer or connection counts by rate class.
- c) Did West Coast Huron consider any alternative allocation methods? Please discuss. If not, why not?
- d) Please explain the rationale for the 63 month timeline for the proposed Tornado Relief Funding Adder.

**Interrogatory #6**

**Ref:** Exhibit 1, Tab 1, Schedule 2, Page 2

West Coast Huron provides a table on page 2 of the customer impacts of the proposed Tornado Relief Funding Adder for the residential and GS < 50 kW customer classes. Please expand the table to include all rate classes.

**Interrogatory #7**

**Ref:** Exhibit 1, Tab 1, Schedule 5, Pages 1-2

West Coast Huron indicates that its Large Use Customer is operating at limited capacity and that its second largest customer is not expected to be operational until the end of the year.

Please explain the circumstances of each customer that limits its operations.