

March 3, 2008
Board Secretary
Ontario Energy Board
PO Box 2319
2300 Yonge St. 27th Floor
Toronto, Ontario, M4P1E4

**Re: Clinton Powerlines – 2008 IRM Application (EB-2007-0904) –
Interrogatory Response.**

Please find below full responses to all Board Staff Interrogatories related to this file.

Ref.: Manager's Summary

- 1. Please explain why Clinton Power Corporation is submitting its 2007 IRM application along with its 2008 IRM application.**

Clinton Power Corp. did not file a 2007 IRM application for May 1, 2007 approval. Recently RDI Consulting became involved in the regulatory requirements for Clinton Power and realized this deficiency. This application containing both 2007 & 2008 IRM applications is an attempt to move Clinton Power Corp. distribution rates to the proper level by May 1, 2008. It needs to be stated that this application does not request any retroactivity for the 2007 application, however, does ensure that Clinton Power Corp. rates are at a level consistent with all other non-rebased LDCs in the province.

- 2. The DRC is part of a customer's total bill both before and after tax, however, your Annualized Customer Bill Impact table does not add the DRC to the total bill before or the total bill after tax.**

There was an error in the bill impact table, please see revised table below.

Clinton Powerlines
Annualized Customer Bill Impacts
Current Approved vs. May 1, 2008 Applied for Rates

Residential Class

1,000 kWh
1.0255 loss factor
1,026 kWh including losses

	2006 Bill			2008 Bill			Difference	
	Volume	Rate	Charge	Volume	Rate	Charge	%	\$
Commodity - 1st	800	\$ 0.0530	\$ 42.40	800	\$ 0.0530	\$ 42.40		
Commodity - 2nd	226	\$ 0.0620	\$ 14.01	226	\$ 0.0620	\$ 14.01		
Sub Total Energy			\$ 56.41			\$ 56.41	0.0%	\$ -
Service Charge			\$ 9.32			\$ 9.44		
Distribution kWh	1,000	\$ 0.0112	\$ 11.20	1,000	\$ 0.0113	\$ 11.30		
Reg. Asset kWh	1,000	\$ 0.0095	\$ 9.50	1,000	\$ -	\$ -		
Retail Transmission - Network	1,000	\$ 0.0057	\$ 5.70	1,000	\$ 0.0047	\$ 4.70		
Retail Transmission - Connection	1,000	\$ 0.0050	\$ 5.00	1,000	\$ 0.0047	\$ 4.70		
Sub Total Delivery			\$ 40.72			\$ 30.14	-26.0%	\$ (10.58)
WMS	1,026	\$ 0.0052	\$ 5.34	1,026	\$ 0.0052	\$ 5.34		
RRA	1,026	\$ 0.0010	\$ 1.03	1,026	\$ 0.0010	\$ 1.03		
Administration Charge			\$ 0.25			\$ 0.25		
Sub Total Regulatory			\$ 6.61			\$ 6.61	0.0%	\$ -
DRC	1,000	\$ 0.0070	\$ 7.00	1,000	\$ 0.0070	\$ 7.00		
Total Bill before Tax			\$ 110.74			\$ 100.16	-9.6%	\$ (10.58)
GST		7%	\$ 7.75		6%	\$ 6.01		
Total Bill after Tax			\$ 118.50			\$ 106.17	-10.4%	\$ (12.32)

General Service < 50 kW

2,000 kWh
1.0255 loss factor
2,051 kWh including losses

	2006 Bill			2008 Bill			Difference	
	Volume	Rate	Charge	Volume	Rate	Charge	%	\$
Commodity - 1st	750	\$ 0.0530	\$ 39.75	750	\$ 0.0530	\$ 39.75		
Commodity - 2nd	1,301	\$ 0.0620	\$ 80.66	1,301	\$ 0.0620	\$ 80.66		
Sub Total Energy			\$ 120.41			\$ 120.41	0.0%	\$ -
Service Charge			\$ 18.06			\$ 18.29		
Distribution kWh	2,000	\$ 0.0108	\$ 21.60	2,000	\$ 0.0109	\$ 21.80		
Reg. Asset kWh	2,000	\$ 0.0074	\$ 14.80	2,000	\$ -	\$ -		
Retail Transmission - Network	2,000	\$ 0.0052	\$ 10.40	2,000	\$ 0.0042	\$ 8.40		
Retail Transmission - Connection	2,000	\$ 0.0045	\$ 9.00	2,000	\$ 0.0043	\$ 8.60		
Sub Total Delivery			\$ 73.86			\$ 57.09	-22.7%	\$ (16.77)
WMS	2,051	\$ 0.0052	\$ 10.67	2,051	\$ 0.0052	\$ 10.67		
RRA	2,051	\$ 0.0010	\$ 2.05	2,051	\$ 0.0010	\$ 2.05		
Administration Charge			\$ 0.25			\$ 0.25		
Sub Total Regulatory			\$ 12.97			\$ 12.97	0.0%	\$ -
DRC	2,000	\$ 0.0070	\$ 14.00	2,000	\$ 0.0070	\$ 14.00		
Total Bill before Tax			\$ 221.24			\$ 204.47	-7.6%	\$ (16.77)
GST		7%	\$ 15.49		6%	\$ 12.27		
Total Bill after Tax			\$ 236.72			\$ 216.74	-8.4%	\$ (19.99)

Ref.: 2007 Model, Sheet 1 (LDC Information)

3. The Date of Submission field has not been completed.

This was an omission on our part, the original filing was sent on Nov. 5, 2007. This should be the submission date. Let me know if you need a new model filed, or if the current model can be adjusted by Board Staff.

rdi

Ref.: 2007 Model, Sheet 3 (2006 Tariff Sheet)

- 4. A review of your current 2006 Board approved Tariff of Rates and Charges indicates that the Distribution Volumetric, Regulatory Asset Recovery, and Retail Transmission rates for the General Service 50 to 4,999 kW class are applied on a “\$/kW” basis, however your 2007 model does not reflect this.**
- 5. A review of your current 2006 Board approved Tariff of Rates and Charges indicates that the Regulated Price Plan – Administration Charge for the General Service 50 to 4,999 kW class includes the descriptor “if applicable”, however your 2007 model does not reflect this.**
- 6. A review of your current 2006 Board approved Tariff of Rates and Charges indicates that the service charge for the Unmetered Scattered Load class is applied on a “per connection” basis, however your 2007 model does not reflect this.**
- 7. A review of your current 2006 Board approved Tariff of Rates and Charges indicates that the Regulated Price Plan – Administration Charge for the Unmetered Scattered Load class includes the descriptor “if applicable”, however your 2007 model does not reflect this**
- 8. A review of your current 2006 Board approved Tariff of Rates and Charges indicates that the service charge for the Sentinel Lighting class is applied on a “per connection” basis, however your 2007 model does not reflect this.**
- 9. A review of your current 2006 Board approved Tariff of Rates and Charges indicates that the Distribution Volumetric, Regulatory Asset Recovery, and retail Transmission rates for the Sentinel Lighting class are applied on a “\$/kW” basis, however your 2007 model does not reflect this.**
- 10. A review of your current 2006 Board approved Tariff of Rates and Charges indicates that the Regulated Price Plan – Administration Charge for the Sentinel Lighting class includes the descriptor “if applicable”, however your 2007 model does not reflect this.**
- 11. A review of your current 2006 Board approved Tariff of Rates and Charges indicates that the service charge for the Street Lighting class is applied on a “per connection” basis, however your 2007 model does not reflect this.**
- 12. A review of your current 2006 Board approved Tariff of Rates and Charges indicates that the Distribution Volumetric, Regulatory Asset Recovery, and Retail Transmission rates for the Street Lighting class are applied on a “\$/kW” basis, however your 2007 model does not reflect this.**

13. A review of your current 2006 Board approved Tariff of Rates and Charges indicates that the Regulated Price Plan – Administration Charge for the Street Lighting class includes the descriptor “if applicable”, however your 2007 model does not reflect this.

14. A review of your current 2006 Board approved Tariff of Rates and Charges indicates that the Transformer Allowance for Ownership charge includes the descriptor “per kW of billing demand/month”, however your 2007 model does not reflect this.

Interrogatory 4 – 14 are all correct statements and were omissions from the original filed model. The intent was to utilize the same tariff sheet terms and definitions as in 2006 for both 2008 and 2007. As discussed above, please let me know if the model needs to be refilled or if these minor adjustments can be made to the model already filed with the Board.

Ref.: 2008 Model, Sheet 1 (LDC Information)

15. The Date of Submission field has not been completed.

This was an omission on our part, the original filing was sent on Nov. 5, 2007. This should be the submission date. Let me know if you need a new model filed, or if the current model can be adjusted by Board Staff.

Ref.: 2008 Model, Sheet 3 (2007 Tariff Sheet)

16. A review of your current 2006 Board approved Tariff of Rates and Charges indicates that the service charge for the Unmetered Scattered Load class is applied on a “per connection” basis, however your 2008 model does not reflect this.

17. A review of your current 2006 Board approved Tariff of Rates and Charges indicates that the service charge for the Sentinel Lighting class is applied on a “per connection” basis, however your 2007 model does not reflect this.

18. A review of your current 2006 Board approved Tariff of Rates and Charges indicates that the service charge for the Street Lighting class is applied on a “per connection” basis, however your 2007 model does not reflect this.

19. A review of your current 2006 Board approved Tariff of Rates and Charges indicates that the Collection of account and both Disconnect/Reconnect at meter charges are applied on a “\$” basis, however your 2008 model does not reflect this.



Interrogatory 16 – 19 are all correct statements and were omissions from the original filed model. The intent was to utilize the same tariff sheet terms and definitions as in 2006 for both 2008 and 2007. As discussed above, please let me know if the model needs to be refilled or if these minor adjustments can be made to the model already filed with the Board.

If you require any further information, please contact me directly.

Sincerely,

Ian McKenzie

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A handwritten signature in black ink, consisting of the lowercase letters 'rdi' in a cursive, stylized font.