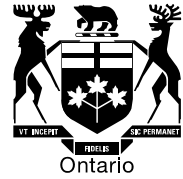


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BY E-MAIL

January 20, 2012

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: EnWin Utilities Ltd.
2012 IRM3 Rate Application
Board Staff Interrogatories
Board File No. EB-2011-0165**

In accordance with the Notice of Application and Hearing, please find attached the Board Staff Interrogatories in the above proceeding. Please forward the following to EnWin Utilities Ltd. and to all other registered parties to this proceeding.

Yours truly,

Original Signed By

Stephen Vetsis
Analyst – Applications & Regulatory Audit

Encl.

**Board Staff Interrogatories
2012 IRM3 Rate Application
EnWin Utilities Ltd. ("Enwin")
EB-2011-0165**

Account 1521 – Special Purpose Charge

Board Staff Interrogatory No. 1

Ref: Application, Manager's Summary – page 6

On page 6 of the Manager's Summary, EnWin states:

Recovery is now sought for \$65,827 in account 1521, which is the residual amount including carrying charges up to April 30, 2012.

- a) Please confirm Peterborough's SPC assessment amount and provide a copy of the original SPC invoice.
- b) Please complete the following table related to the SPC.

SPC Assessment (Principal balance)	Amount recovered from customers in 2010	Carrying Charges for 2010	December 31, 2010 Year End Principal Balance	December 31, 2010 Year End Carrying Charges Balance	Amount recovered from customers in 2011	Carrying Charges for 2011	Forecasted December 31, 2011 Year End Principal Balance	Forecasted December 31, 2011 Year End Carrying Charges Balance	Carrying Charges for 2012 (Jan 1 to April 30)	Total for Disposition (Principal & Interest)

Account 1562 – Deferred PILs

Board Staff Interrogatory No. 2

Ref: Application, Manager's Summary – page 6

Ref: Decision and Order, December 19, 2011, EB-2011-0165 – page 2

On page 6 of the Manager's Summary, EnWin states:

On August 12, 2011 in EB-2008-0381, the Board approved a debit balance of \$5,227,019 to be recovered from customers through the Applicant's 2012 application and rate adjustment. That balance includes interest carrying charges forecast to April 30, 2012. Through this application, the Applicant seeks rate riders to recover that balance.

In the 2012 IRM3 Rate Generator model, filed by EnWin on November 25, 2011, a recovery period of 1 year was applied for the recovery of balances in Group 1 Deferral and Variance Accounts, including account 1521 and 1562.

On December 5, 2011, EnWin filed an amendment stating:

EnWin is proposing to not dispose of Account 1562 Deferred PILs through this proceeding, but rather to defer consideration of 1562 until EnWin's 2013 Cost of Service Rate Application. The magnitude of the impact of disposition when combined with other 2012 rate increase drivers warrants its deferral to the 2013 Cost of Service proceeding.

On December 19, 2011, the Board filed a Decision and Order indicating that it would hear EnWin's originally filed application in this proceeding and stating that:

The Board notes that EnWin is not required by the Combined PILs Decision to dispose of account 1562 over a one-year period and expects that EnWin, intervenors and Board staff will investigate rate mitigation options as part of this proceeding.

- a) Using the Board's 2012 IRM3 Rate Generator model, please provide the calculated rate riders for each class and the resulting bill impacts for the Residential and GS<50 kW classes under each of the following scenarios:
 - i. All accounts are disposed together (Group 1 Deferral and Variance accounts, 1521 and 1562) over:
 - i. 2 years
 - ii. 3 years
 - iii. 4 years
 - ii. Group 1 Deferral and Variance accounts (including 1521) balances are disposed over 1 year and the balance in account 1562 is disposed over:
 - i. 2 years
 - ii. 3 years
 - iii. 4 years
- b) Does EnWin have any other preferred methods of mitigation that it wishes to propose? If so, please provide a description of the method, the calculated rate riders for all classes and the resulting bill impacts for the Residential and GS < 50 kW classes.
- c) If EnWin has any other rationale for deferring the disposition of the balance in account 1562 to its next Cost of Service application, beyond the resulting bill impacts, please provide that rationale.
- d) Is EnWin planning on filing a stand-alone smart meter cost recovery application prior to its 2013 Cost of Service application? If so, please provide the estimated bill impacts of any smart meter related costs, if available.

2012 RTSR Adjustment Workform

Board Staff Interrogatory No. 3

Ref: 2012 RTSR Workform – Sheet 4

A section of Sheet 4 “RRR Data” of the 2012 RTSR Work Form is reproduced below.

Rate Class	Unit	Non-Loss Adjusted Metered kWh	Non-Loss Adjusted Metered kW	Applicable Loss Factor	Load Factor	Loss Adjusted Billed kWh	Billed kW
Residential	kWh	647,461,708		1.0377		671,871,015	-
General Service Less Than 50 kW	kWh	223,701,633		1.0377		232,135,184	-
General Service 50 to 4,999 kW	kW	944,319,635	2,412,328		53.65%	944,319,635	2,412,328
General Service 3,000 to 4,999 kW	kW	49,071,888	130,266		51.63%	49,071,888	130,266
Large Use - Regular	kW	295,089,951	579,240		69.83%	295,089,951	579,240
Large Use - 3TS	kW	349,426,416	698,063		68.61%	349,426,416	698,063
Large Use - Ford Annex	kW	54,756,020	99,529		75.40%	54,756,020	99,529
Unmetered Scattered Load	kWh	3,697,869		1.0377		3,837,279	-
Sentinel Lighting	kW	969,375	2,668		49.80%	969,375	2,668
Street Lighting	kW	16,997,069	48,810		47.73%	16,997,069	48,810

Board staff has been unable to reconcile the billing determinant data provided for the Large Use classes with the data in EnWin’s 2010 RRR 2.1.5 filing.

EnWin’s 2010 RRR 2.1.5 filing shows a total consumption of 446,259,625 kWh for Large User customers. The total consumption entered for large users in the 2012 RTSR Work Form is 699,272,387 kWh.

Similarly, EnWin’s 2010 RRR 2.1.5 filing shows a total demand of 881,104 kW for Large User customers. The total demand entered for large users in the 2012 RTSR Work Form is 1,376,832 kW.

- a) Please provide evidence in support of the consumption and demand data entered for the Large Use classes. If the data was entered in error, please indicate the error, provide updated data, reconciled with the 2010 RRR 2.1.5 filing for Large User customers, for each large use class and Board staff will make the applicable changes to the model.

2012 IRM3 Rate Generator Model

Board Staff Interrogatory No. 4

Ref: 2012 IRM3 Rate Generator Model – Sheet 9

A section of Sheet 9 “2012 Cont. Shed. Def_Var” of the 2012 IRM3 Rate Generator model is reproduced below.

Account Descriptions	Account Number	Closing Interest Balances as of Dec 31-10	Projected Interest on Dec-31-10 Balances			Total Claim	2.1.7 RRR As of Dec 31-10 *	Variance RRR vs. 2010 Balance (Principal + Interest)
			Projected Interest from Jan 1, 2011 to December 31, 2011 on Dec 31-10 balance adjusted for disposition during 2011 *	Projected Interest from January 1, 2012 to April 30, 2012 on Dec 31-10 balance adjusted for disposition during 2011 *	Dec			
Group 1 Accounts								
24 LV Variance Account	1550	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
25 RSVA - Wholesale Market Service Charge	1580	\$ 9,897	\$ 34,868	\$ 11,619	\$ 2,427,699	\$ 2,880,052	\$ -	\$ -
26 RSVA - Retail Transmission Network Charge	1584	\$ 1,737	\$ 7,522	\$ 2,507	\$ 523,439	\$ 491,060	\$ -	\$ -
27 RSVA - Retail Transmission Connection Charge	1586	\$ 1,106	\$ 1,268	\$ 423	\$ 86,895	\$ 171,318	\$ -	\$ -
28 RSVA - Power (excluding Global Adjustment)	1588	\$ 24,866	\$ 125,454	\$ 41,818	\$ 8,726,221	\$ 8,521,519	\$ -	\$ -
29 RSVA - Power - Sub-Account - Global Adjustment	1588	\$ 63,527	\$ 156,679	\$ 52,893	\$ 10,669,601	\$ 6,113,443	\$ -	\$ -
30 Recovery of Regulatory Asset Balances	1590	\$ 209	\$ 0	\$ 0	\$ 230	\$ 262	\$ -	\$ -
31 Disposition and Recovery of Regulatory Balances (2008)†	1595	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
32 Disposition and Recovery of Regulatory Balances (2009)†	1595	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
34 Group 1 Sub-Total (including Account 1588 - Global Adjustment)		\$ 48,334	\$ 59,294	\$ 19,765	\$ 4,961,019	\$ 90,140	\$ -	\$ -
35 Group 1 Sub-Total (excluding Account 1588 - Global Adjustment)		\$ 15,193	\$ 99,385	\$ 33,128	\$ 6,908,592	\$ 6,203,593	\$ -	\$ -
36 RSVA - Power - Sub-Account - Global Adjustment	1588	\$ 63,527	\$ 156,679	\$ 52,893	\$ 10,669,601	\$ 6,113,443	\$ -	\$ -
37								
38 Special Purpose Charge Assessment Variance Account	1521	\$ -	\$ 386,324	\$ -	\$ 65,827	\$ 452,151	\$ -	\$ 0
40 Deferred Payments in Lieu of Taxes	1562	\$ 749,551	\$ 64,554	\$ 21,518	\$ 5,227,019	\$ 5,140,947	\$ -	\$ -
42 Group 1 Total + 1521 + 1562		\$ 701,217	\$ 381,064	\$ 1,753	\$ 1,018,27	\$ 5,683,238	\$ -	\$ 0
44 The following is not included in the total claim but are included on a memo basis:								
45 Board-Approved CDM Variance Account	1567				\$ -		\$ -	\$ -
46 PILs and Tax Variance for 2006 and Subsequent Years	1592							

Board staff has been unable to reconcile the RRR 2.1.7 balance shown for account 1562 on Sheet 9 of the 2012 IRM3 Rate Generator model with the balance of \$ 10,604,273 reported by EnWin in their 2010 RRR 2.1.7 filing.

- a) Please reconcile the reported 2010 RRR balance for account 1562 with the \$5,140,947 entered in Sheet 9 of the 2012 IRM3 Rate Generator model.

Lost Revenue Adjustment Mechanism (LRAM)

Board Staff Interrogatory No. 5

Ref: Application, Appendix G

EnWin has requested an LRAM recovery for a total amount of \$2,227,586.68 for lost revenues incurred from 2006-2011 based on CDM programs delivered from 2006-2010.

- a) Please confirm that EnWin has used final 2010 program evaluation results from the OPA to calculate its LRAM amount.
- b) If EnWin did not use final 2010 program evaluation results from the OPA, please explain why and update the LRAM amount accordingly.
- c) Please provide a table that shows the LRAM amounts EnWin has collected historically.

- d) Please confirm that EnWin has not received any of the lost revenues requested in this application in the past. If EnWin has collected lost revenues related to programs applied for in this application, please discuss the appropriateness of this request.
- e) Please identify the CDM savings that were proposed to be included in EnWin's last Board approved load forecast for CDM programs deployed from 2006-2009 inclusive.
- f) Please provide a table that shows the LRAM amounts requested in this application by the year they are associated with and the year the lost revenues took place, divided by rate class within each year. Use the table below as an example and continue for all the years LRAM is requested:

Program Years (Divided by rate class)	Years that lost revenues took place				
	2006	2007	2008	2009	2010
2006	\$xxx	\$xxx	\$xxx	\$xxx	\$xxx
2007		\$xxx	\$xxx	\$xxx	\$xxx
2008			\$xxx	\$xxx	\$xxx
2009				\$xxx	\$xxx
2010					\$xxx

- g) Please discuss if EnWin is requesting carrying charges.
- h) If EnWin is requesting carrying charges, please provide a table that shows the monthly LRAM balances, the Board-approved carrying charge rate and the total carrying charges by month for the duration of this LRAM request to support your request for carrying charges. Use the table below as an example:

Year	Month	Monthly Lost Revenue	Closing Balance	Interest Rate	Interest \$