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**BY E-MAIL**

January 27, 2012

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

Dear Ms. Walli:

**Re: Brantford Power Inc.  
2012 IRM3 Distribution Rate Application  
Board Staff Interrogatories  
Board File No. EB-2011-0147**

In accordance with Procedural Order No.1, please find attached Board Staff Interrogatories in the above proceeding. Please forward the following to Brantford Power Inc. and to all other registered parties to this proceeding.

Please note that due to the delayed filing of the evidence which supports Brantford's request to dispose of Account 1562 – Deferred PILs, Board staff Interrogatories for Account 1562 will be filed by February 3, 2012.

In addition please advise Brantford Power Inc. that responses to all interrogatories are due by February 10, 2012.

Yours truly,

*Original signed by*

Georgette Vlahos  
Analyst – Applications & Regulatory Audit

Encl.

**Brantford Power Inc.  
2012 Electricity Distribution Rates  
EB-2011-0147**

**Board Staff Interrogatories**

**Tax Savings Workform**

**Interrogatory #1**

**Ref: A portion of the Tax Savings Workform, Tab 3**

Rate Group	Rate Class	Fixed Metric	Vol Metric	Re-based Billed Customers or Connections A	Re-based Billed kWh B	Re-based Billed kW C
RES	Residential	Customer	kWh	33,818	294,990,955	
GSLT50	General Service Less Than 50 kW – Single Phase energy-billed [G1]	Customer	kWh	2,675	110,476,190	
GSGT50	General Service 50 to 4,999 kW	Customer	kW	410	588,310,445	1,465,200
USL	Unmetered Scattered Load	Connection	kWh	435	2,335,344	
Sen	Sentinel Lighting	Connection	kW	788	549,288	1,787
SL	Street Lighting	Connection	kW	10,056	7,244,141	25,242
EMB	Embedded Distributor	Connection	kW	3		170,406
SB	Standby Power	Connection	kW	1	1,667,325	22,905

Board staff is unable to verify the “Re-Based Billed kW” for the General Service 50 to 4,999 kW rate class to Brantford’s previous CoS Application (EB-2007-0698). Board staff also cannot verify the “Re-based Billed Customers or Connections” and the “Re-based Billed kW” for the Embedded Distributor rate class.

- (A) Please provide evidence from Brantford’s previous CoS Application supporting these figures.
- (B) If changes are necessary, please confirm the figures which reconcile with Brantford’s previous cost of service application, and Board staff will make the necessary adjustments to the model.

**Interrogatory #2**

**Ref: Tax Savings Workform, Tab 5**

Board staff has been unable to verify the data entered on tab 5 of the Tax Savings Workform.

- (A) Please provide evidence from Brantford’s previous CoS Draft Rate Order or Decision supporting these figures.
- (B) If changes are necessary, please confirm the figures which reconcile with Brantford’s previous cost of service application, and Board staff will make the necessary adjustments to the model.

## RTSR Workform

### Interrogatory #3

Ref: RTSR Workform, Tab 4

Rate Class	Unit	Non-Loss Adjusted Metered kWh	Non-Loss Adjusted Metered kW	Applicable Loss Factor
Residential	kWh	289,840,430		1.0420
General Service Less Than 50 kW	kWh	99,142,979		1.0420
General Service 50 to 4,999 kW	kW	522,228,963	1,326,294	
Unmetered Scattered Load	kWh	1,571,067		1.0420
Sentinel Lighting	kW	490,659	1,636	
Street Lighting	kW	7,354,350	22,480	
Embedded Distributor	kW		158,115	
Standby Power	kW			

Board staff is unable to reconcile the figures reported in the column “Non-Loss Adjusted Metered kW” for the classes Sentinel Lighting and Embedded Distributor to Brantford’s RRR 2.1.5 filings.

- (A) Please provide evidence for the above noted figures.
- (B) If changes are required, please confirm the figures which reconcile with Brantford’s RRR 2.1.5 filings, and Board staff will make the necessary adjustments.

## Rate Generator Model

### Interrogatory #4

Ref: A portion of the Rate Generator Model, Tab 4

General Service 50 to 4,999 kW		
Smart Meter Funding Adder	\$	2.07 April 30, 2011
Service Charge	\$	291.15

Board staff notes that

an “Effective Until Date” for the Smart Meter Funding Adder for the General Service 50 to 4,999 kW appears to have been entered incorrectly, as it should read April 30, 2012.

- (A) If Brantford agrees with Board staff, please confirm, and Board staff will make the necessary correction to the model.

### Interrogatory #5

Ref: Rate Generator, Tab 6

Ref: Current Tariff of Rates and Charges, Effective May 1, 2011

Board staff notes that the line item “Rate Rider for Global Adjustment Sub-Account Disposition (2010) – Effective until April 30, 2012 – Applicable only for Non-RPP Customers”, as found on Brantford’s current tariff schedule, has not been entered on tab 6 of the Rate Generator.

- (A) If this is an error, please confirm, and Board staff will make the necessary corrections to the model.
- (B) If the answer to (A) is no, please confirm, and provide an explanation for the exclusion of this rider.

### Interrogatory #6

Ref: A portion of the Rate Generator, Tab 10

Rate Class	Unit	Metered kWh	Metered kW	Billed kWh for Non-RPP Customers	Estimated kW for Non-RPP Customers	Distribution Revenue <sup>1</sup>
Residential	\$/kWh	289,840,430		45,309,871	-	8,582,357
General Service Less Than 50 kW	\$/kWh	99,142,979		17,034,818	-	1,486,103
General Service 50 to 4,999 kW	\$/kW	522,228,963	1,326,294	485,772,998	1,233,708	5,621,038
Unmetered Scattered Load	\$/kWh	1,571,067		-	-	78,490
Sentinel Lighting	\$/kW	490,659	1,636	116,485	388	41,147
Street Lighting	\$/kW	7,354,350	22,480	7,354,350	22,480	143,434
Embedded Distributor	\$/kW		158,115		-	
Standby Power	\$/kW				-	37,679
Total		920,628,448	1,508,525	555,588,522	1,256,576	15,990,248

Board staff is unable to confirm the figures entered for the column “Distribution Revenue” to Brantford’s previous CoS proceeding (EB-2007-0698), specifically to the Operating Revenue section.

- (A) Please provide evidence supporting these figures.
- (B) If changes are necessary, please confirm the figures, and Board staff will update the model.

### Account 1521 – Special Purpose Charge (“SPC”)

### Interrogatory #7

- (A) Please confirm what amount Brantford paid in regards to the SPC Assessment and provide a copy of the original invoice.
- (B) Please confirm Brantford’s beginning and ending billing dates to customers for the SPC Assessment.
- (C) 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)

### **Lost Revenue Adjustment Mechanism (“LRAM”)**

#### **Interrogatory #8**

**Ref: Manager’s Summary / pg. 10**

**Ref: Appendix C / LRAM Support**

Brantford has requested an LRAM recovery associated with 2005 to 2010 CDM programs for a total amount of \$642,821.54.

- (A) Please confirm that Brantford has used final 2010 program evaluation results from the OPA to calculate its LRAM amount.
- (B) If Brantford 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 Brantford has collected historically.
- (D) Please confirm that Brantford has not received any of the lost revenues requested in this application in the past. If Brantford 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 Brantford’s last Board approved load forecast for CDM programs deployed from 2005-2008 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			
	2009	2010	2011	2012
2005	\$xxx	\$xxx	\$xxx	\$xxx
2006	\$xxx	\$xxx	\$xxx	\$xxx
2007	\$xxx	\$xxx	\$xxx	\$xxx
2008	\$xxx	\$xxx	\$xxx	\$xxx
2009	\$xxx	\$xxx	\$xxx	\$xxx
2010		\$xxx	\$xxx	\$xxx

(G) Please discuss if Brantford is applying for carrying charges on the LRAM amounts requested in this application.

(H) If Brantford 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 \$