

***PUBLIC INTEREST ADVOCACY CENTRE***

***LE CENTRE POUR LA DEFENSE DE L’INTERET PUBLIC***

## ONE Nicholas Street, Suite 1204, Ottawa, Ontario, CanadaK1N 7B7

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Michael Janigan

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Counsel for VECC

613-562-4002

June 04, 2012

**VIA 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: EB-2011-0274 – Rideau St. Lawrence Distribution Inc.**

**Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed the interrogatories of VECC in the above-noted proceeding.

Yours truly,

*Original Signed*

Michael Janigan

Counsel for VECC

cc. Rideau St. Lawrence Distribution Inc. - John Walsh - [jwalsh@rslu.ca](mailto:jwalsh@rslu.ca)

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| --- | --- |
| **REQUESTOR NAME** | **VECC** |
| **INFORMATION REQUEST ROUND NO**: | **# 2** |
| **TO:** | **Rideau St. Lawrence Distribution Inc.** |
| **DATE:** | **June 4, 2012** |
| **CASE NO:** | **EB-2011-0274** |
| **APPLICATION NAME** | **2012 Cost of Service Electricity Distribution Rate Application** |

**LOAD FORECAST AND REVENUE OFFSETS**

1. **Reference: VECC #12 e) and VECC #15 a)**
   1. With respect to VECC #12 e), please confirm that the predicted 2011 monthly values shown in the response are based on weather normal values for CDD and HDD whereas the 2011 Actual Purchases shown will reflect the actual HDD and CDD values for each month.
   2. With respect to VECC #15 a), please confirm whether the predicted value shown (115,241,655) was based on actual or weather normal HDD and CDD values.

**OPERATING COSTS**

1. **Reference: Exhibit 4, Schedule 2, Table 4.3/Exhibit 11, Schedule 15, Table 15.2**
   1. Please explain the difference between the $97,473 in 2012 forecast meter costs shown at Table 4.3 and the $82,473 in smart meter costs shown at Table 15.2.
   2. Please provide a breakdown and explanation of the $18,160 in Change Management and $11,561 in Administration costs related to smart meters as shown in Table 15.2.
2. **Reference: Board Staff IR #12 / VECC IR # 22 /Exhibit 4, Schedule 5, Table 4.9, page 23**

The response to both interrogatories Board Staff #12 and VECC #22 statesTable 4.9 shows the costs to Rideau St. Lawrence Utilities (Utilities) of $46,840 for water meter reading.Yet for meter reading Table 4.9 purports to show services from RSL to Utilities.

* 1. Does RSL provide any meter reading services to Utilities?
  2. Please clarify Appendix 2-L to show the total costs incurred by RSL for the services and the amount paid by the affiliates (Utilities and Services) for these services and/or the total costs incurred by Utilities or Services and the amounts paid by RSL for the services.

1. **Reference: Board Staff #19 b)**
2. Please explain why the Billing and Collecting weighting factor for GS<50 is less than that for Residential.

**COST ALLOCATION**

1. **Reference: Board Staff #18 and #20 b)**
2. Has RSL completed its review of the number of USL connections and is the value used in the revised Cost Allocation (per Board Staff #20 b)) the appropriate value? If not, please provide and update the cost allocation as required.
3. **Reference: Board Staff #19 b)**
4. Please explain why the Billing and Collecting weighting factor for GS<50 is less than that for Residential.
5. **Reference: Board Staff #19 b) and #20 b)**
6. Did the Cost Allocation run used to determine the results set out in Board Staff #20 b) include both the changes described in #20 a) and those outlined in #19 b)?
7. If yes, please provide an electronic copy of the updated Cost Allocation model that supports the results in Board Staff #20 b).
8. If not, please provide a revised Cost Allocation model run that reflects the changes described in both Board Staff #19 b) and #20 a).

**RATE DESIGN**

1. **Reference: Board Staff #22 and VECC #30**
   1. Please confirm what year the kW values shown in the response to Board Staff #22 are for.
   2. If they are 2012 forecast values, how were they calculated and what were the actual 2011 billing values?

**\*\*\*End of Document\*\*\***