

PUBLIC INTEREST ADVOCACY CENTRE LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

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August 27, 2012

VIA MAIL and 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: Vulnerable Energy Consumers Coalition (VECC)

Submission of VECC Interrogatories EB-2012-0198

Hydro Hawkesbury Inc.

Please find enclosed the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Thank you.

Yours truly,

Michael Janigan Counsel for VECC Encl.

cc: Hydro Hawkesbury Inc.

Mr. Michel Poulin

ONTARIO ENERGY BOARD

IN THE MATTER OF

the Ontario Energy Board Act, 1998, S.O. 1998, c. 15 (Schedule B), as amended;

AND IN THE MATTER OF an Application by
Hydro Hawkesbury Inc. (HHI) for an order or orders
approving or fixing just and reasonable
distribution rates to be effective September 1, 2012 to reflect the
recovery of costs for deployed smart meters.

Information Requests of the Vulnerable Energy Consumers Coalition (VECC)

VECC Question #1

Reference: Exhibit 1, Tab 1, Schedule 6, Page 3

<u>Preamble:</u> The table on Page 3 shows the number of smart installed for each rate class by year.

a) Please provide a summary of HHI's incremental internal labour costs included in this application in terms of positions, contract type (permanent vs. temporary, part-time vs. full-time), length of employment and work activities.

VECC Question #2

Reference: Exhibit 1, Tab 1, Schedule 8, Page 2

<u>Preamble:</u> The table on Page 2 provides the average meter cost and average installation cost for residential and GS<50 kW customer classes.

- a) Please provide the number of single phase and polyphase smart meters installed by rate class.
- b) Please explain why the average installation costs for the residential and GS<50 kW customer classes are equal.

VECC Question # 3

Reference: Exhibit 1, Tab 1, Schedule 10, Page 1

<u>Preamble:</u> The evidence indicates HHI has elected to allocate the SMDR using cost causality methodology and calculating class specific rates.

a) Please confirm HHI's cost causality methodology.

VECC Question # 4

Reference 1: Smart Meter Model, 20120716, Sheet 2

a) Sheet 2 shows smart meter installations in the years 2009 to 2011. Line 1.1.1 shows smart meter costs for the years 2009 to 2011; however, Line 1.1.2 shows smart meter installation costs for 2011 only. Please explain.

VECC Question #5

Reference 1: Smart Meter Model, 20120716

Reference 2: Board Guideline G-2011-0001, Smart Meter Funding and Cost Recovery – Final Disposition, dated December 15, 2011, Page 19

<u>Preamble:</u> The Guideline states, "The Board views that, where practical and where data is available, class specific SMDRs should be calculated on full cost causality."

- a) Please complete a separate smart meter revenue requirement model by rate class. (Please include any revisions to the model resulting from interrogatory responses)
- b) Please re-calculate the SMDR & SMIRR rate riders based on full cost causality by rate class.
- c) Please provide a table that summarizes the total Smart Meter Rate Adder Revenue and associated interest collected by customer class.
- d) If HHI is unable to provide separate smart revenue requirement models by rate class, please provide a detailed explanation.

VECC Question #6

Reference: Exhibit 1, Tab 1, Schedule 6, Page 1

<u>Preamble:</u> HHI indicates it filed with the OEB a Smart Metering Investment Plan (SMIP) outlining the timeline and expected costs to implement smart metering across its current and future customer base.

a) Please confirm the filing date of the SMIP.

b)	Please provide HHI's expected capital and OM&A costs to implement smart meters as provided in the SMIP and discuss any significant variances.