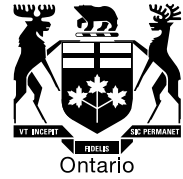


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BY E-MAIL

October 25, 2012

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

Dear Ms. Walli:

**Re: Brant County Power Inc.
2013 IRM3 Rate Application
Board Staff Interrogatories
Board File No. EB-2012-0108**

In accordance with the procedure documented in the Notice of Application and Hearing, please find attached Board staff's interrogatories in the above proceeding with respect to Brant County Power Inc.'s 2013 IRM3 Rate Application.

Yours truly,

Stephen Vetsis
Analyst – Applications & Regulatory Audit

Encl.

**Board Staff Interrogatories
2013 IRM3 Rate Application
Brant County Power Inc. ("BCP")
EB-2012-0108**

2013 IRM Rate Generator Model

Board Staff Interrogatory No. 1

Ref: 2013 IRM Rate Generator Model – Sheet 5

Ref: Exhibit 9, Tab 1, Schedule 1, Application, EB-2010-0125 – Page 1

Sheet 5 of the 2013 IRM Rate Generator Model states:

If you have received approval to dispose of balances from prior years, the starting point for entries in the 2013 DVA schedule below will be the balance sheet date as per your G/L for which you received approved. For example, if in the 2012 EDR process (CoS or IRM) you received approved for the December 31, 2010 balances, the starting point for your entries below should be the adjustment column BF for principal and column BK for interest.

The table from page 1 of Exhibit 9, Tab 1, Schedule 1 of BCP's 2011 cost of service application (EB-2010-0125) is reproduced below.

USoA	Description	Principal (Dec. 31, 2009)	Interest on Dec 31, 2009 balance to Apr. 30 2011	Total	C
1550	Low Voltage	\$57,027	(\$21,094)	\$35,933	
1580	RSVA WMS	(\$600,396)	\$103,627	(\$496,769)	
1584	RSVA NW	(\$1,639,976)	(\$133,526)	(\$1,773,502)	
1586	RSVA CN	(\$1,533,354)	(\$95,277)	(\$1,628,631)	
1588	RSVA COP Excluding GA	\$143,933	(\$28,006)	\$115,927	
1588	RSVA COP GA	\$1,180,849	\$24,562	\$1,205,411	
1590	Recovery of Reg. Assets	\$0	\$314,713	\$314,713	
1508	OEB Cost Assessment	\$27,701	\$5,056	\$32,757	
1508	OMERS Pension	\$124,358	\$17,451	\$141,809	
1518	RCVA – Retail	(\$61,590)	(\$3,658)	(\$65,248)	
1548	RCVA – STR	\$33,765	\$2,030	\$35,795	
1525	Misc. Deferred Debits	\$7,211	\$2,005	\$9,216	
1555	Smart Meter Capital	(\$93,604)	(\$3,957)	(\$97,561)	
1556	Smart Meter OM&A	\$79,474	\$2,139	\$81,613	
1565	CDM	\$0	\$0	\$0	
1566	CDM – Contra	\$0	\$0	\$0	
1582	RSVA One Time	\$0	\$0	\$0	
1562	PILS	\$945,868	\$184,311	\$1,130,179	
Total		(\$1,326,794)	\$370,376	(\$956,358)	

A section of Sheet 5 "2013 Continuity Schedule" of the 2013 IRM Rate Generator Model is reproduced below.

		2011												
Account Descriptions	Account Number	Opening Principal Amounts as of Jan 1-11	Transactions (Credits) during 2011 excluding interest and adjustments *	Board Approved Disposition during 2011	Other * Adjustments during Q1 2011	Other * Adjustments during Q2 2011	Other * Adjustments during Q3 2011	Other * Adjustments during Q4 2011	Closing Principal Balance as of Dec-31-11	Opening Interest Amounts as of Jan 1-11	Interest Jan 1 to Dec-31-11	Board Approved Disposition during 2011	Adjustments during 2011 - other *	Closing Interest Amounts as of Dec-31-11
Group 1 Accounts														
LV Variance Account	1550	(174,092)	(250,370)	(174,092)					(250,370)	(21,843)	(1,478)			(823)
RSVA - Wholesale Market Service Charge	1580	(900,610)	(344,794)	(900,610)					(344,794)	91,220	(8,859)	66,907		(2,446)
RSVA - Retail Transmission Network Charge	1584	(810,215)	(185,500)	(810,215)					(185,500)	(161,665)	(4,605)			(829)
RSVA - Retail Transmission Connection Charge	1586	(171,477)	(200,300)	(171,477)					(200,300)	(122,350)	(5,527)			(1,062)
RSVA - Power (including Global Adjustment)	1588	135,022	(640,049)	135,022					(640,049)	(25,500)	(4,501)	(85,562)		(35,482)
RSVA - Power - Sub-account - Global Adjustment	1588	1,210,401	716,580	1,210,401					716,580	38,028	10,422	84,603		(36,929)
Recovery of Regulatory Asset Balances	1590	0	0	0					0	0	0	0		0
Disposition and Recovery/Refund of Regulatory Balances (2008) ⁸	1595	0	0	0					0	0	0	0		0
Disposition and Recovery/Refund of Regulatory Balances (2009) ⁸	1595	0	0	0					0	0	0	0		0
Disposition and Recovery/Refund of Regulatory Balances (2010) ⁸	1595	0	0	0					0	0	0	0		0
Group 1 Sub-Total (including Account 1588 - Global Adjustment)														
		(1,454,370)	(916,004)	(1,454,370)	0	0	0	0	(916,004)	(202,242)	(10,500)	(209,388)	0	(5,448)
Group 1 Sub-Total (including Account 1588 - Global Adjustment)														
		(2,601,312)	(1,636,195)	(2,601,312)	0	0	0	0	(1,637,665)	(240,270)	(23,023)	(233,364)	0	(30,782)
RSVA - Power - Sub-account - Global Adjustment	1588	1,210,401	716,580	1,210,401	0	0	0	0	716,580	38,028	10,422	84,603	0	(36,929)
Deferred Payments in Lieu of Taxes														
	1562	(259,325)							(259,325)	(38,967)	(3,812)			(42,779)
Total of Group 1 and Account 1562														
		(1,710,230)	(916,004)	(1,454,370)	0	0	0	0	(1,710,629)	(241,209)	(16,332)	(209,388)	0	(40,228)
Special Purpose Charge Assessment Variance Account*														
	1521	95,736	(83,426)					(1,236)	11,074	460	787			1,220
LIAM Variance Account														
	1508	0							0	0	0			0
Total including Accounts 1562, 1521 and 1508														
		(1,610,520)	(1,000,030)	(1,454,370)	0	0	0	(1,236)	(1,697,555)	(240,749)	(15,605)	(209,388)	0	(44,805)

Board staff is unable to reconcile the values shown in the Board Approved Disposition during 2011 columns of BCP's 2013 IRM Rate Generator Model with the balances approved for disposition in BCP's last cost of service application.

Additionally, a section of Sheet 5 "2013 Continuity Schedule" is reproduced below. Note that Board staff has entered the values from BCP's 4th quarter RRR filing 2.1.7 in the column labeled 2.1.7 RRR.

		Projected Interest on Dec-31-11 Balances			2.1.7 RRR	
Account Descriptions	Account Number	Projected Interest from Jan 1, 2012 to December 31, 2012 on Dec 31 -11 balance adjusted for disposition during 2012 ²	Projected Interest from January 1, 2013 to April 30, 2013 on Dec 31 -11 balance adjusted for disposition during 2012 ²	Total Claim	As of Dec 31-11	Variance RRR vs. 2011 Balance (Principal + Interest)
Group 1 Accounts						
LV Variance Account	1550	(3,689)	(1,230)	(256,512)	(251,593)	(0)
RSVA - Wholesale Market Service Charge	1580	(5,068)	(1,689)	(353,988)	(347,230)	(0)
RSVA - Retail Transmission Network Charge	1584	(2,721)	(907)	(189,373)	(185,745)	0
RSVA - Retail Transmission Connection Charge	1586	(3,072)	(1,024)	(214,137)	(207,341)	2,700
RSVA - Power (excluding Global Adjustment)	1588	(9,526)		(622,089)	(612,563)	0
RSVA - Power - Sub-account - Global Adjustment	1588	10,563		692,990	682,427	0
Recovery of Regulatory Asset Balances	1590	0		0	0	0
Disposition and Recovery/Refund of Regulatory Balances (2008) ⁸	1595	0		0	0	0
Disposition and Recovery/Refund of Regulatory Balances (2009) ⁸	1595	0		0	0	0
Disposition and Recovery/Refund of Regulatory Balances (2010) ⁸	1595	0		0	0	0

The December 31, 2011 balance provided by BCP in the continuity schedule for account 1586 does not reconcile with the balance reported in BCP's 4th quarter RRR filing 2.1.7.

- Please provide an updated continuity schedule that reflects the balances approved for disposition in BCP's 2011 cost of service application. In the updated continuity schedule, please complete the 2.1.7 RRR column and provide a reconciliation for any variances shown.

Board Staff Interrogatory No. 2

Ref: 2013 IRM Rate Generator Model – Sheet 6

Ref: Exhibit 3, Tab 2, Schedule 1, Application, EB-2010-0125 – Page 1

A section of Sheet 6 "Billing Det. for Def-Var" is reproduced below.

15										
16	Rate Class	Unit	Metered kWh	Metered kW	Billed kWh for Non-RPP Customers	Estimated kW for Non-RPP Customers	Distribution Revenue ¹			
17	Residential	\$/kWh	82,794,132		5,968,355	0	2,815,758			
18	General Service Less Than 50 kW	\$/kWh	40,399,125		6,301,421	0	986,753			
19	General Service 50 to 4,999 kW	\$/kW	150,731,053	388,493	150,731,053	388,493	1,623,291			
20	Unmetered Scattered Load	\$/kWh	509,821		224,400	0	12,813			
21	Sentinel Lighting	\$/kW	222,341	574	39,365	102	22,385			
22	Street Lighting	\$/kW	1,763,973	4,783	1,737,349	4,711	257,697			
23	MicroFit									
24										
25										
26										
	Total		276,420,445	393,850	165,001,943	393,305	5,718,697			

The table showing BCP's load forecast from its 2011 Cost of Service application (EB-2010-0125), is reproduced below.

Load Forecast										
Normalized Average Consumption kWh										
	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
RESIDENTIAL	68,659,239	72,712,385	73,977,688	81,427,289	79,560,842	80,124,626	79,466,965	79,540,610	77,571,849	80,122,583
GENERAL SERVICE										
Less than 50 kW	32,010,516	31,414,184	33,999,045	36,179,422	34,406,201	33,769,287	35,036,378	36,124,082	37,411,381	39,095,551
Greater than 50 to 4,999 kW	98,037,314	98,159,714	93,388,024	101,120,635	105,111,508	171,480,226	164,540,705	153,259,553	157,033,123	151,750,742
Unmetered Scattered Load	376,828	464,888	468,188	532,055	524,636	521,085	502,476	496,256	499,482	493,370
Sentinel Lighting	245,304	228,491	220,029	210,113	208,256	196,420	187,414	180,387	220,415	215,167
Street Lighting	1,348,551	1,551,177	1,464,366	1,832,853	1,894,400	1,699,400	1,702,146	1,696,627	1,711,505	1,707,054
TOTALS	198,677,752	204,530,839	203,517,340	221,102,367	221,505,841	287,791,044	281,426,082	271,297,515	274,447,755	273,384,467
Normalized Average Consumption kW										
	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
Greater than 50 to 4,999 kW	303,425	318,143	299,165	321,664	332,145	356,488	353,530	342,040	402,016	388,493
Sentinel Lighting	681	634	611	560	555	523	499	481	588	574
Street Lighting	2,528	4,135	4,202	4,685	4,779	4,779	4,770	4,770	4,795	4,783
TOTALS	306,634	322,912	303,978	326,909	337,479	361,790	358,799	347,291	407,399	393,850

Board staff is unable to reconcile the kWh billing determinants provided on Sheet 6 of the 2013 Rate Generator Model with the values provided in BCP's load forecast from its 2011 Cost of Service application.

- a) Please provide evidence in support of the kWh billing determinants provided for each class on Sheet 6 of the 2013 IRM Rate Generator Model. If any values were provided in error, please indicate the error and Board staff will make the appropriate changes.

2013 RTSR Workform

Board Staff Interrogatory No. 3

Ref: 2013 RTSR Workform - Sheet 4

A section of Sheet 4 "RRR Data" from the 2013 RTSR Workform 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	81,900,003		1.0495		85,954,053	-
General Service Less Than 50 kW	kWh	36,170,425		1.0495		37,960,861	-
General Service 50 to 1,000 kW	kW	158,029,761	141,180		153.42%	158,029,761	141,180
General Service 50 to 1,000 kW - Interval Meters	kW		95,143		0.00%	-	95,143
General Service 1,000 to 4,999 kW - Interval Meters	kW		70,591		0.00%	-	70,591
Unmetered Scattered Load	kWh	445,308		1.0495		467,351	-
Sentinel Lighting	kW	164,006	479		46.93%	164,006	479
Street Lighting	kW	1,696,635	4,770		48.75%	1,696,635	4,770

Board staff is unable to reconcile the Non-Loss Adjusted Metered kW for the Sentinel Lighting class with the value reported in BCP's RRR 2.1.5 filing.

- a) Please provide evidence in support of the Non-Loss Adjusted Metered kW for the Sentinel Lighting class provided on Sheet 4 of the 2013 RTSR Workform. If the data was entered in error, please indicate the error and Board staff will make the required changes to the model.

Manager's Summary

Board Staff Interrogatory No. 5

Ref: Manager's Summary, Application – Page 1

On page 1 of the Manager's Summary of the Application, BCP states that it is requesting a 2-year disposition period for Group 1 accounts.

- a) Please provide BCP's rationale for its request to dispose of Group 1 balances over a 2-year period.
- b) Please provide the estimated bill impacts for customers in all classes using a one-year period to dispose of balances in Group 1 accounts.