Ontario Energy Board

P.O. Box 2319 27th. Floor 2300 Yonge Street Toronto ON M4P 1E4 Telephone: 416- 481-1967 Facsimile: 416- 440-7656 Toll free: 1-888-632-6273 Commission de l'énergie de l'Ontario

C.P. 2319 27e étage 2300, rue Yonge Toronto ON M4P 1E4 Téléphone: 416- 481-1967 Télécopieur: 416- 440-7656

Numéro sans frais: 1-888-632-6273



BY E-MAIL

October 30, 2012

Florence Thiessen Vice President / Treasurer Centre Wellington Hydro Ltd. P.O. Box 217, 730 Gartshore St. Fergus ON N1M 2W8

Dear Ms. Thiessen:

Re: Centre Wellington Hydro Ltd.

Application for Rates

Application Board File Number EB-2012-0113

A preliminary review of the application has identified that certain sections of the evidence supporting the application do not comply with the Board's Filing Requirements¹ for cost of service applications and/or the associated spreadsheets, models and work forms. As a result, the Board is unable to process your application at this time.

The missing information includes:

Chapter 2 Filing Requirement Reference (page no.)	Description
11	Statement as to when the distributor believes the Board's rate order would be required in order to achieve rate implementation by the requested date – this is the latest date when Centre Wellington Hydro Ltd. ("CWH") would require a Rate Order so that the utility could implement the approved rates for billing purposes assuming the proposed effective date of May 1, 2013;

¹ Chapter 2 of the *Filing Requirements for Electricity Transmission and Distribution Applications*, dated June 28, 2012 and subsequent Board communications.

13	Schedule providing the most recent Board-approved revenue requirement and breakdown (i.e. OM&A, depreciation, taxes or PILs (grossed up), return and revenue offsets), as approved by the Board for CWH's previous cost of service application EB-2008-0225.
26	All data used to determine the forecasts should be presented and filed in live MS Excel spreadsheet format.
26	Any revenue from affiliate transactions, shared services or corporate cost allocations as described in section 2.7.5. CWH has noted other revenues for water and sewer billing in E3/T3/S2/Table 3.38, and jobbing/rework is documented in E4/T2/S6/page 1, but no affiliate transactions are documented.
30	Post-retirement benefit cost accruals should be identified and described separately from current benefit costs. In E4/T2/S4/Table 4.37 and Appendix 2-K, current and post-retirement benefit cost accruals are not separated.
30	Basis for performance pay, goals, measures, and review processes for any pay-for-performance plans. CWH states that on E4/T2/S4/page 34 that it has no incentive or bonus compensation, but documents annual amounts ranging from \$3652 to \$5475 in E4/T2/S4/Table 4.37 and Appendix 2-K
34-35	PILs and Integrity Checks. CWH has not documented adherence to the Integrity Checks (Section 2.7.8.2 of the Filing Requirements). In particular, CWH, documents that it anticipates using losses carried forward to offset tax payments in 2013 and/or 2014 but has not used or input loss carry-forwards in the PILs model.
37-38	At a minimum, distributors must apply for the disposition of the balance in the LRAMVA as part of their COS applications.
39	Appendix 2-OA is incomplete for each historical, bridge and test year, as Cell I31 needs to be input with the rate base for each year.
40 and 41	The filed version of the Revenue Requirement Work Form has missing data and calculates a revenue sufficiency that does not correspond with the revenue requirement and revenue deficiency documented in Exhibit 6 and E6/T1/S3/Table 6.2.
48	Appendix 2-V Revenue Reconciliation does not correspond with the base revenue requirement documented in Exhibit 8 and Appendix 2-P column 7D, specifically for GS 50-2999 kW and GS 3000-4999 kW customer classes.
54	DVA Balances shown for disposition in Table 9.7 do not match the totals claimed in the derivation of the DVA rate riders in Appendix 2-EB and E9/T2/S7/page 2.

The Board expects that CWH will file the above listed required information as soon as possible.

If any of the information that is identified as missing is located in sections other than those identified in the Filing Requirements, or if any of the information is not applicable

in your circumstances, please provide an explanation when filing the remainder of the required information.

Please direct any questions relating to this application to Keith Ritchie, Project Advisor at 416 440 8124 or Keith.Ritchie@ontarioenergyboard.ca.

Yours truly,

Original signed by

John Pickernell Assistant Board Secretary