

November 12, 2012

Ontario Energy Board
PO Box 2319
2300 Yonge St
Toronto, ON M4P 1E4
Attn: Board Secretary

**RE: Brant County Power Inc. (BCP) – 2013 3rd Generation IRM Rate Application
EB-2012-0108**

Please find attached responses to Board Staff Interrogatories on our 2013 distribution rates based on 3rd Generation IRM.

Brant County Power is filing:

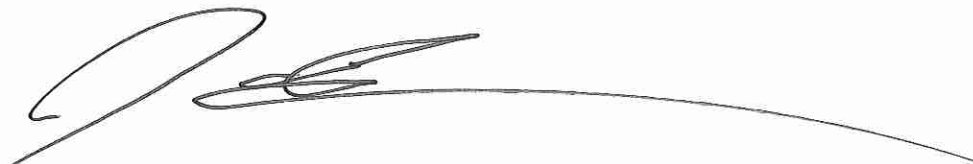
- Interrogatory Responses to Board Staff IRs
- Appendix A – further evidence for IR # 2

Please note, that this filing was delayed due to the power outage the OEB building had on November 9, 2012.

Note, the numbering convention is off in the Board Staff IRs, there is not IR # 4

If you have any questions regarding this application, please do not hesitate to contact me directly.

Sincerely,



Ian McKenzie
Director of Finance and Regulatory Affairs

Interrogatory Responses

Board Staff Interrogatory 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.

TABLE OMITTED DUE TO PDF COPING LIMITATIONS

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

TABLE OMITTED DUE TO PDF COPING LIMITATIONS

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 BPC's last cost of service applications.

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.

TABLE OMITTED DUE TO PDF COPING LIMITATIONS

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

- a) Please provide an updated continuity schedule that reflects the balances approved for disposition in BPC'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.

Response

The issue is the first referenced table is not from the settlement agreement approved in the CoS application in 2011. The settlement agreement used a 2010 date for disposition not the 2009 values referenced in the original table.

Please refer to Appendix M in the settlement agreement for EB-2010-0125. BCP believes that this information is filed correctly and followed the instructions from the Board and referenced in this IR.

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.

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

TABLE OMITTED DUE TO PDF COPING LIMITATIONS

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.

Response

BCP is providing an excel model which was direct output from the settlement conference and decision on EB-2010-0125. This model substantiates the data originally filed in our 2013 IRM for consumption and usage. Note, part of the settlement conference adjusted the quantities to the value filed in our 2013 application. This model ties into our approved rate order and therefore is the consumption used in the 2011 CoS process.

Please see appendix A in this submission

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.

TABLE OMITTED DUE TO PDF COPING LIMITATIONS

Board Staff is unable to reconcile the Non-Loss Adjusted Metered kW for the Sentinel Lighting class with the values 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.

Response

The value in question was erroneously reported. The kW value should be 27 for the sentinel light class. BCP apologizes for this data inconsistency.

Please note, this will also impact the RTSR addendum file utilized to capture the Brantford Power embedded distributor charges into our retail billing rates.

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.

Response

- a) BCP rational was based on the dollar value being rebated.

We are trying to balance customer rate swings (year over year changes due to variance accounts) and the cashflow of BCP.

- b) The bill impact on a 800kWh residential customer originally applied for was a reduction in total bill of \$2.60 or 2.2% per month. Revising the disposition window as requested changes this impact to a reduction of \$5.04 or 4.2% per month.

Appendix A

Rate Design

Distribution Revenue Requirement \$ 5,718,697.69

Cost allocation results

Residential	49.24%	\$ 2,815,758.29
GS < 50 kW	17.25%	\$ 986,752.86
GS 50 to 4,999 kW	28.39%	\$ 1,623,290.67
Street Lights	4.51%	\$ 257,697.51
Sentinel Lights	0.39%	\$ 22,385.14
Unmetered	0.22%	\$ 12,813.21
Total	100.00%	\$ 5,718,697.69

Residential Class

Distribution Revenue \$ 2,815,758.29

Fixed component

Customers	Rate	Months	Annual \$	%
8,335	\$ 11.00	12	\$ 1,100,220.00	39.1%

Variable

kWh's	Rate	Annual \$	%
82,794,132	\$ 0.0207	\$ 1,715,538.29	60.9%

General Service < 50 kW

Distribution Revenue \$ 986,752.86

Fixed component

Customers	Rate	Months	Annual \$	%
1,338	\$ 17.00	12	\$ 272,952.00	27.7%

Variable

kWh's	Rate	Annual \$	%
40,399,125	\$ 0.0177	\$ 713,800.86	72.3%

General Service 50 to 4,999 kW

Distribution Revenue \$ 1,623,290.67

Fixed component

Customers	Rate	Months	Annual \$	%
112	\$ 95.00	12	\$ 127,680.00	7.9%

Variable

kWh's	Rate	Annual \$	%
388,493	\$ 3.8498	\$ 1,495,610.67	92.1%

Street Light

Distribution Revenue \$ 257,697.51

Fixed component

Customers	Rate	Months	Annual \$	%
2,630	\$ 1.50	12	\$ 47,340.00	18.4%

Variable

kWh's	Rate	Annual \$	%
4,783	\$ 43.9802	\$ 210,357.51	81.6%

Sentinel Light

Distribution Revenue \$ 22,385.14

Fixed component

Customers	Rate	Months	Annual \$	%
218	\$ 2.00	12	\$ 5,232.00	23.4%

Variable

kWh's	Rate	Annual \$	%
574	\$ 29.8835	\$ 17,153.14	76.6%

Unmetered Loads

Distribution Revenue \$ 12,813.21

Fixed component

Customers	Rate	Months	Annual \$	%
51	\$ 2.00	12	\$ 1,224.00	9.6%

Variable

kWh's	Rate	Annual \$	%
509,821	\$ 0.0227	\$ 11,589.21	90.4%