



January 16, 2013

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

Re: Bluewater Power Distribution Corporation
2013 Electricity Distribution Rates
Board File No. EB-2012-0107

Dear Ms. Walli:

Attached please find AMPCO's interrogatories in the above proceeding.

Please do not hesitate to contact me if you have any questions or require further information.

Sincerely yours,

(ORIGINAL SIGNED)

Adam White
President
Association of Major Power Consumers in Ontario

Copies to: Bluewater Power Distribution Corporation
Mr. Andrew Taylor, The Energy Boutique
Intervenors

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EXHIBIT 2 - RATE BASE

Interrogatory #1

Reference: Exhibit 2, Tab 4, Schedule 2, Page 1, Table 1

Preamble: Table 1 shows capital spending from 2012, the test year 2013 and 2014 and 2015.

- a) The proposed capital spending for 2013 reconciles with Table 1 at Exhibit 2, Tab 4, Schedule 3, Page 3; the capital spending for 2012 does not. Please explain.

Interrogatory #2

Reference: Exhibit 2, Tab 4, Schedule 2, Page 7

- a) For each of the maintenance activities listed on page 7, please provide the maintenance/ inspection cycle for each activity in 2009, 2012 and proposed for 2013.
- b) Please explain the reasons for any changes in the maintenance, inspection or testing cycles in 2009, 2012 and 2013.

Interrogatory #3

Reference: Exhibit 2, Tab 4, Schedule 3

- a) Please provide a year-over-year variance analysis for the capital plan as shown in Table 3 Ongoing Capital Spending (Page 5) and Table 4 Non-routine Investments (Page 6) including reasons/drivers of variances.

Interrogatory #4

Reference: Exhibit 2, Tab 5, Schedule 1, Page 1, Table 1

- a) Please add a column to Table 1 for 2013 projection with a working capital factor of 12%.

Interrogatory #5

Reference: Exhibit 2, Tab 6, Schedule 1, Pages 1-2

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- a) Please provide the number of additional contract call centre staff hired in 2010, the positions, the start date for each position and the total cost by position in terms of salary and benefits.
- b) Please provide the Customer Service Indicators for 2012.
- c) The evidence indicates in 2010 there was high heat, implementation of HST in July 2010, adverse media attention and changes to customer service rules. Please confirm the number of contract call centre staff referenced in part (a) still employed at Bluewater Power in 2011, 2012 and proposed for 2013 and discuss the need for each position in each year on the basis of quantity and length of calls.

Interrogatory #6

Reference: Exhibit 2, Tab 6, Schedule 1, Page 3

- a) Does Bluewater Power track momentary outages?
 - If yes, please provide the MAIFI data from 2008 to 2012 and discuss the trend.
 - If no, please provide an explanation.
- b) Please discuss if Bluewater Power has a service reliability indicator or program to address the reliability issues faced by the Large User class.
- c) Please provide Bluewater Power's internal SAIDI, SAIFI, CAIDI & MAIFI targets for 2013.
- d) Please provide the number of interruptions, customers affected and customer minutes for each of the years 2008 to 2012.
- e) Please provide a breakdown of customer minutes by cause codes for the years 2008 to 2012.
- f) Please provide a further breakdown of defective equipment on the basis of cause and customer minutes.
- g) Please discuss how Bluewater Power compares to other utilities in its cohort in terms of reliability.

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EXHIBIT 3 - OPERATING REVENUE

Interrogatory #7

Reference: Exhibit 3, Tab 1, Schedule 6, Page 2

Preamble: The evidence indicates that for 2012 Bridge Year vs. 2011 Actual related to the variance on distribution revenue, there was a positive variance of \$233,666 mainly in the residential and GS>50 rate offset by a slight decrease in the Large User rate class.

a) Please confirm the reason for the variances identified above.

EXHIBIT 4 - OPERATING COSTS

Interrogatory #8

Reference: Exhibit 4, Tab 1, Schedule 1, Page 2

Preamble: The evidence states that the salaries represent an increase of 3% over 2012 levels as set out in Bluewater Power's Collective Agreement, which does not expire until after the Test Year.

a) Please confirm when it expires.

b) Please confirm the types of positions where a 3% increase in salaries is applied (i.e. union, non-union etc.)

Interrogatory #9

Reference: Exhibit 4, Tab 1, Schedule 1, Attachment 1

a) Please confirm the Total Recoverable Expenses for 2013.

Interrogatory #10

Reference: Exhibit 4, Tab 2, Schedule 1, Page 2

Preamble: The evidence indicates the FTEEs is not driven by increases in demand from a growing customer base but by increased demands due to regulation, government directions such as the Green Energy Act, and demands related to infrastructure renewal.

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- a) Please provide the number of new FTEs driven by the Green Energy Act vs. infrastructure renewal.

Interrogatory #11

Reference: Exhibit 4, Tab 2, Schedule 3, Page 2

- a) Please provide a breakdown of annual (non-rebasing) consulting and legal fees.

EXHIBIT 7 – COST ALLOCATION

Interrogatory #12

Reference: Exhibit 7, Tab1, Schedule 1, Page 7, Table 6

Preamble: Table 6 shows proposed 2013 proposed revenue to cost ratios.

- a) Please provide a table with the revenue to cost ratios for the years 2009 to 2012.
- b) Please provide the rationale in moving the revenue to cost ratios for some classes away from unity.
- c) Please explain why Bluewater Power is proposing to move the revenue to cost ratio for the Large User class from the previously approved ratio of 103% in 2012 IRM to 115% in 2013.
- d) Please discuss why Bluewater Power does not propose phased movement towards unity in the IRM years.
- e) Please provide Bluewater Power's perspective on the accuracy of the data and its level of modeling experience related to its updated cost allocation study filed in this application.

Interrogatory #13

Reference: Exhibit 7, Tab1, Schedule 1, Attachment 2

- a) Please discuss if Bluewater Power consulted with its Large User class in allocating costs and expenses to the Large User class in completing its 2013 cost allocation study.
- i) If yes, please summarize the results of those consultations.
 - ii) If not, why not.

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EXHIBIT 8 - RATE DESIGN

Interrogatory #14

Reference: Exhibit 8, Tab 2, Schedule 1

- a) Please recalculate the volumetric rate and the fixed and variable percentages for Large User class if the monthly fixed charge is set at the Minimum System with PLCC, i.e. \$3,940.67.