

EB-2012-0107
Bluewater Power Distribution Corporation
2013 Cost of Service Electricity Rate Application
AMPCO Supplemental Interrogatories

EXHIBIT 2 - RATE BASE

2.0-AMPCO-15

Reference: 2.0-AMPCO 6, Tab 4, Schedule 28

- a) Please provide a breakdown of the number of momentary outages by cause for the years 2009 to 2012.
- b) With respect to comparing Bluewater Power with other utilities in its cohort in terms of reliability, Bluewater Power indicates it does not believe that the data that is gathered in the OEB Yearbook in regard to reliability at this point provides an adequate basis in order to compare utilities. Bluewater Power indicates until the reliability definitions and standards have been revised, fully understood and implemented by distributors there is no basis on which to compare one utility with another.

Please discuss what Bluewater Power has done in the past, prior to EB-2010-0249, to compare its reliability data to other utilities in its cohort and include any comparative analysis.

EXHIBIT 7 – COST ALLOCATION

7.0-AMPCO-16

Reference 1: 7.0-AMPCO 12, Tab 9, Schedule 5

Reference 2: 7.0-AMPCO 13, Tab 9, Schedule 6

As part of the Settlement Agreement in Bluewater Power's last COS application, it was agreed to by all Parties that Bluewater Power would undertake a study of its costs to serve its customers in the Large Use Rate classes. . The study will assist both in determining the costs to serve customers in this rate class and determining the balance of rates among all rate classes in the future.

- a) Please confirm it is Bluewater Power's position that it has undertaken a study of its costs to serve its customers in the Large Use Rate Classes as per the Settlement Agreement.
- b) Please comment on the quality of the cost data for the Large User class and discuss any limitations.

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- c) In Bluewater Power's opinion, do the costs assigned to the Large User class represent full cost causality?
- d) Based on the cost study, please discuss why Bluewater Power has not assigned a revenue to cost ratio of 100% for the Large User class to reflect the results of the study and full cost causality.
- e) Does Bluewater Power believe that a further study of the costs to serve the large use customer is required to determine full cost causality?
- f) Please confirm Bluewater Power can propose revenue to cost ratios adjustments to the revenue to cost ratios resulting from the cost allocation study in this application, to better reflect cost causality and reduce cross subsidization between rate classes.