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February 26, 2013

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
PO Box 2319
26th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

**Re: Ottawa River Power Corporation 2013 Response to
Board Staff Interrogatories
EB-2012-0158**

Dear Ms. Walli:

Please find enclosed two paper copies of the responses to the Board Staff Interrogatories for the 2013 IRM3 Rate Application for Ottawa River Power Corporation. Please note that this was filed electronically in PDF form through the OEB website on February 26, 2013.

Kind Regards,

A handwritten signature in blue ink that reads "J Wilkin". The signature is stylized and appears to be the first name and last name of the sender.

Jane Wilkinson-Donnelly, CMA
Chief Financial Officer

**Ottawa River Power Corporation
 2013 Electricity Distribution Rates
 EB-2012-0158
 Response to Board Staff Interrogatories**

Ottawa River Power Corporation respectfully submits the following responses to Board Staff Interrogatories:

1. Bill Impact

Ref: Rate Generator Model

A portion of Sheet “14. Bill Impacts” from the Rate Generator Model is reproduced below.

Residential		Consumption		RPP Tier One		Load Factor		Loss Factor	
		800 kWh		600 kWh				1.0390	

	CURRENT ESTIMATED BILL			PROPOSED ESTIMATED BILL			Change (\$)	Change (%)	% of Total RPP Bill	% of Total TOU Bill
	Volume	Current Rate (\$)	Current Charge (\$)	Volume	Proposed Rate (\$)	Proposed Charge (\$)				
Total Bill on TOU (Including OCEB)			92.40			109.75	17.35	18.78%		100.00%

Board staff notes that based on the 2013 distribution rates proposed by Ottawa River, the total monthly bill impact for a typical residential customer will be \$17.35 or 18.78%.

Board staff further that Ottawa River’s rate application does not include a rate mitigation plan.

- a. Given the size of the bill impacts, did Ottawa River consider any rate mitigation plan?
- b. If not, why not?
- c. If yes, please discuss the options considered by Ottawa River and the reasons for discarding them.

Response to Interrogatory 1:

- a) Ottawa River Power Corporation did not consider any rate mitigation plan.
- b) The Board is correct that a typical residential customer's bill will increase by \$17.35 or 18.78% per month. The primary cause for this increase however, is not in the actual distribution rate, but in a deferral account rate rider that will cease on April 30, 2013 as reproduced below and highlighted in yellow:

Service Charge	1	10.93	10.93	1	11.03	11.03	0.10	0.91%
Distribution Volumetric Rate	800	0.0148	11.84	800	0.0149	11.92	0.08	0.68%
Low Voltage Volumetric Rate	800	0.0011	0.88	800	0.0011	0.88	0.00	0.00%
Distribution Volumetric Rate Rider(s)	800	(0.0230)	(18.40)	800	(0.0017)	(1.36)	17.04	(92.61)%
Total: Distribution			5.25			22.47	17.22	328.00%

During Ottawa River Power Corporation's 2010 Cost of Service Application, ORPC applied to have more than \$4 million dollars in deferral accounts disposed of over 4 years. At that time ORPC was aware of the rate impacts this rate rider would have on customers when it was implemented and then again when it was removed.

The following is an excerpt from The Board's Decision and Order on Ottawa River Power Corporation's 2010 Cost of Service Application:

"Given the concern over intergenerational inequity, the Board is of the view that the disposition period for Ottawa River's deferral and variance account balances, excluding the Global Adjustment sub-account, should be shorter than four years. The Board approves the disposition of account balances comprising principal balances as of December 31, 2009 and projected interest to December 31, 2010 over a 28 month period, which would end on April 30, 2013. The Board is also of the view that the same disposition period should apply to the Global Adjustment sub-account balance."

As this is a substantial rate increase, Ottawa River Power Corporation wishes to assure the Board, that it does have a plan in place to communicate the explanation for this increase to its customers. Front line staff has been equipped with the information required to explain the reason for the increase and a spring newsletter has also been prepared.

With three embedded generators, ORPC benefited (and continues to benefit) from lower transmission charges that were held in variance accounts. These were true-up and repaid to our customers over 28 months. With a rate mechanism now in place to true these up annually, our customers will no longer wait for the true-up, but will enjoy lower transmission rates on a continuous basis. This will avoid any large fluctuations in rates in the future.

2. Rural Rate Protection Charge ("RRPC")

Ref: Rate Generator Model

A portion of Sheet "4. Current Tariff Schedule" from the Rate Generator Model is reproduced below.

MONTHLY RATES AND CHARGES - Regulatory Component	
Wholesale Market Service Rate	\$/kWh 0.0052
Rural Rate Protection Charge - effective until April 30, 2012	
Rural Rate Protection Charge - effective on and after May 1, 2012	\$/kWh 0.0011
Standard Supply Service - Administrative Charge (if applicable)	\$ 0.2500

Board staff notes that the Board's Decision (EB-2011-0405)¹ dated December 21, 2011 stated that effective May 1, 2012 the Rural Rate Protection Charge would be reduced to \$0.11/kWh from its previous value of \$0.13/kWh.

- d. If the omission in the "effective until April 30, 2012" value in the Rate Generator Model is an error, Board staff will make the relevant correction.

Response to Interrogatory 2:

Ottawa River Power Corporation confirms that the omission in the "effective until April 30, 2012" value in the Rate Generator Model is an error.

3. Street Lighting Rate Rider

Ref: Rate Generator Model

Ref: ORPC’s current Tariff of Rates and Charges (“TRC”)²

A portion of Sheet “4. Current Tariff Schedule” from the Rate Generator Model is reproduced below.

Street Lighting Service Classification

Rate Rider for Global Adjustment Sub-Account (2010) – effective until April 30, 2013 Applicable only for Non-RPP Customers	\$/kWh	0.0045
Rate Rider for Deferral/Variance Account Disposition (2010)	\$/kW	0.8857

A portion of ORPC’s current TRC is reproduced below.

STREET LIGHTING SERVICE CLASSIFICATION

Rate Rider for Deferral/Variance Account Disposition (2010) – effective until April 30, 2013 \$/kW (0.8857)

Board staff notes that the value provided for the “Rate Rider for Deferral/Variance Account Disposition (2010)” in the Rate Generator Model is a debit rather than a credit as provided in the current TRC. Board staff also notes that the descriptor “effective until April 30, 2013” is missing in the Rate Generator Model.

- a. If the input in the Rate Generator Model is an error, Board staff will make the relevant correction.

Response to Interrogatory 3:

- The debit value input in the Rate Generator Model is actually correct, as ordered in the 2010 Cost of Service Application. This was incorrectly brought forward as a credit on the Board’s Rate Order for 2012 Rates for Ottawa River Power Corporation.
- Ottawa River Power Corporation confirms that the descriptor “effective until April 30, 2013” is missing.

4. Disposition during 2012

Ref: Rate Generator Model

Ref: ORDC's 2012 IRM Decision (EB-201 1-0192)³

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

Account Descriptions	Account Number	2012		
		Principal Disposition during 2012 - instructed by Board	Interest Disposition during 2012 - instructed by Board	Closing Principal Balances as of Dec 31.11 Adjusted for Dispositions during 2012
Group 1 Accounts				
LV Variance Account	1550	34,777	(254)	88,680
RSVA - Wholesale Market Service Charge	1580	(514,693)	(556)	122,987
RSVA - Retail Transmission Network Charge	1584	84,209	1,116	56,182
RSVA - Retail Transmission Connection Charge	1586	(256,481)	560	265,969
RSVA - Power (excluding Global Adjustment)	1588	(473,114)	(1,625)	(199,792)
RSVA - Power - Sub-account - Global Adjustment	1588	101,545	(68)	(57,171)
Recovery of Regulatory Asset Balances	1590			0
Disposition and Recovery/Refund of Regulatory Balances (2008) ⁵	1595			0
Disposition and Recovery/Refund of Regulatory Balances (2009) ⁵	1595			0
Disposition and Recovery/Refund of Regulatory Balances (2010) ⁵	1595			0

The table from ORDC's 2012 IRM Decision (page 9) which identifies the principal and interest amounts approved for disposition, is reproduced below.

Account Name	Account Number	Principal Balance A	Interest Balance B	Total Claim C = A + B
LV Variance Account	1550	\$34,777	\$427	\$35,205
RSVA - Wholesale Market Service Charge	1580	-\$514,693	-\$22,100	-\$525,337
RSVA - Retail Transmission Network Charge	1584	\$84,209	\$2,766	\$86,975
RSVA - Retail Transmission Connection Charge	1586	-\$256,481	-\$4,467	-\$260,948
RSVA - Power (excluding Global Adjustment)	1588	-\$473,114	-\$10,898	-\$484,012
RSVA - Power - Global Adjustment Sub-Account	1588	\$101,545	\$1,922	\$103,467
Group 1 Total				-\$1,044,650

Board staff notes that for each Group 1 Account:

- “The Principal Disposition during 2012 – instructed by Board” in the Rate Generator Model reconciles with the “Principal Balance A” in the 2012 IRM Decision.
- “The Interest Disposition during 2012 – instructed by Board” in the Rate Generator Model does not reconcile with the “Interest Balance B” in the 2012 IRM Decision.
 - a. If the input into the Rate Generator model is an error, Board staff will make the necessary corrections.

Response to Interrogatory 4:

Ottawa River Power Corporation confirms that it did dispose of the interest in the same amounts as instructed by the board. This however, was incorrectly input into the model with only the portion of interest up to December 31, 2011 on Sheet 5 column CA and asks the Board staff to make the necessary corrections.

5. Adjustment from Revenue-to-Cost Ratio Model

Ref: Rate Generator Model

Ref: Revenue-to-Cost Ratio Model

A portion of Sheet "9. Rev2Cost_GDPIPI" from the Rate Generator Model is reproduced below.

Rate Class	Current MFC	MFC Adjustment from R/C Model	Current Volumetric Charge	DVR Adjustment from R/C Model	Price Cap Index to be Applied to MFC and DVR	Proposed MFC	Proposed Volumetric Charge
Residential	10.93		0.0148		0.88%	11.03	0.0149
General Service Less Than 50 kW	22.51		0.0104		0.88%	22.81	0.0105
General Service 50 to 4,999 kW	372.81		0.6387		0.88%	376.05	0.6443
Service Line Lighting	2.56		7.7587		0.88%	2.58	7.8270
Street Lighting	1.84		10.1285		0.88%	1.86	10.2175
Unmetered Scattered Load	6.15		0.0020		0.88%	6.20	0.0020
MicroFit	5.25					5.25	

A portion of Sheet "14.Adjust To Proposed Rates" from the Revenue-to-Cost Ratio Model is reproduced below.

Adjustment Required Base Service Charge	Adjustment Required Base Distribution Volumetric Rate kWh	Adjustment Required Base Distribution Volumetric Rate kW
G = A - D	H = B - E	I = C - F
-\$ 0.11	-\$ 0.0002	\$ -
\$ -	\$ -	\$ -
\$ -	\$ -	\$ -
\$ -	\$ -	\$ -
\$ -	\$ -	\$ -
\$ 0.35	\$ -	\$ 1.9124

Board staff notes that the adjustments calculated in the latter have not been input in the two adjustment columns in the former.

- a. If the absence of input into the Rate Generator model is an error, Board staff will make the necessary corrections.

Response to Interrogatory 5:

Ottawa River Power Corporation confirms that the absence of input into the Rate Generator model is an error and asks Board staff to make the necessary corrections.

6. Specific Service Charge

Ref: Rate Generator Model

Ref: ORPC's current Tariff of Rates and Charges

A portion of Sheet "10. Other Charges & LF" from the Rate Generator Model is reproduced below.

Customer Administration		
Arrears certificate	\$	15.00
Account History	\$	15.00
Returned cheque charge (plus bank charges)	\$	15.00
Account set up charge/change of occupancy charge	\$	30.00

A portion of ORPC's current TRC is reproduced below.

Customer Administration		
Arrears Certificate	\$	15.00
Account History	\$	15.00
Returned Cheque Charge (plus bank charges)	\$	15.00
Account set up charge/change of occupancy charge (plus credit agency costs if applicable)	\$	30.00

Board staff notes that with respect to "Account set up charge/change of occupancy charge", the descriptor "plus credit agency costs if applicable" is missing in the Rate Generator Model.

- a. If the input in the Rate Generator Model is an error, Board staff will make the relevant correction.

Response to Interrogatory 6:

Ottawa River Power Corporation confirms that the descriptor "plus credit agency costs if applicable" is missing in the Rate Generator Model and asks the Board staff to make the relevant corrections.

7. Last Cost-of-Service Re-based Year

Ref: RTSR Model

Ref: Shared Tax Savings Model

Ref: Revenue-to-Cost Ratio Model

A portion of Sheet "1. Info" from the RTSR Model is reproduced below.



Utility Name	Ottawa River Power Corporation
Assigned EB Number	EB-2012-0158
Name and Title	Jane Wilkinson-Donnelly
Phone Number	613-732-3687
Email Address	jwilkinson@orpowercorp.com
Date	03-Jan-13
Last COS Re-based	2009

A portion of Sheet "1. Info" from the Shared Tax Savings Model is reproduced below.



Utility Name	Ottawa River Power Corporation
Assigned EB Number	EB-2012-0158
Name and Title	Jane Wilkinson-Donnelly, Chief Financial Officer
Phone Number	613-732-3687
Email Address	jwilkinson@orpowercorp.com
Date	03-Jan-13
Last COS Re-based	2009

A portion of Sheet “1. Info” from the Revenue-to-Cost Ratio Model is reproduced below.



Utility Name	Ottawa River Power Corporation
Assigned EB Number	EB-2012-0158
Name and Title	Jane Wilkinson-Donnelly
Phone Number	613-732-3667
Email Address	jwilkinson@orpowercorp.com
Date	03-Jan-13
Last COS Re-based	2009

Board staff notes that the “Last COS Re-based” year indicated in all three models is 2009. Board staff further notes that ORPC’s last cost-of-service re-basing was in 2010 under proceeding EB-2009-0165⁴.

- a. If the input in the above models is an error, Board staff will make the relevant correction.

Response to Interrogatory 7:

Ottawa River Power confirms that the last cost-of-service re-basing was in 2010 under proceeding EB-2009-0165 and asks the Board staff to make the relevant corrections.

8. Current Tariff – Distribution Volumetric Rates

Ref: Revenue-to-Cost Ratio Model

Ref: ORPC's current Tariff of Rates and Charges

A portion of Sheet "3. Re-Based Bill Det & Rates" from the Revenue-to-Cost Ratio Model is reproduced below.

Rate Group	Rate Class	Fixed Metric	Vol Metric	Re-based Billed			Current Tariff Service Charge D	Current Tariff Distribution Volumetric Rate kWh E	Current Tariff Distribution Volumetric Rate kW F
				Customers or Connections A	Re-based Billed kWh B	Re-based Billed kW C			
RES	Residential	Customer	kWh	8,896	79,547,654		10.52	0.0169	
GSL150	General Service Less Than 50 kW	Customer	kWh	1,391	36,098,066		22.61	0.0114	
GSGT50	General Service 50 to 4,999 kW	Customer	kW	144	79,345,026	211,781	372.81		1.0341
JSL	Unmetered Scattered Load	Connection	kWh	73	437,952		5.15	0.0030	
Ser	Sentinel Lighting	Connection	kW	216	265,370	760	2.56		8.0703
SL	Street Lighting	Connection	kW	2,653	2,414,487	6,853	1.84		10.4342

Board staff notes that distribution volumetric rates in ORPC's current TRC are as follows.

	\$/kWh	\$/kW
Residential	0.0148	
General Service Less Than 50 kW	0.0104	
General service 50 to 4,999 kW		0.6387
Unmetered Scattered Load	0.0020	
Sentinel Lighting		7.7587
Street Lighting		10.1285

Board staff notes that the values for "Current Tariff Distribution Volumetric Rate" for kWh and kW provided in the Revenue-to-Cost Ratio model for all rate classes are different from the distribution volumetric rates in ORPC's current TRC.

- If the input in the Revenue-to-Cost Ratio Model is an error, Board staff will make the relevant correction.

Response to Interrogatory 8:

Ottawa River Power confirms that the Distribution Volumetric Rate input into the Revenue-to-Cost Ratio model incorrectly includes the Low Voltage Service rate and asks the Board staff to make the relevant corrections.

9. Proposed Revenue-to-Cost Ratio - Residential

Ref: Revenue-to-Cost Ratio Model

Ref: Manager's Summary

A portion of Sheet "10. Proposed RC Ratio Adj" from the Revenue-to-Cost Ratio Model is reproduced below.

Rate Class	Current Revenue			Proposed Revenue Cost		Final Adjusted Revenue E = C * D	Dollar Change F = E - C	Percentage Change G = (E / C) - 1
	Adjusted Revenue A	Cost Ratio B	Re-Allocated Cost C = A / B	Ratio D	Revenue E = C * D			
Residential	\$ 2,546,960	1.08	\$ 2,358,297	1.07	\$ 2,522,794	-\$ 24,167	-0.9%	
General Service Less Than 50 kW	\$ 839,542	0.88	\$ 954,025	0.88	\$ 839,542	-\$ 0	0.0%	
General Service 50 to 4,999 kW	\$ 808,376	1.03	\$ 784,831	1.03	\$ 808,376	-\$ 0	0.0%	
Unmetered Scattered Load	\$ 6,871	0.80	\$ 8,589	0.80	\$ 6,871	\$ 0	0.0%	
Sentinel Lighting	\$ 13,928	0.70	\$ 19,897	0.70	\$ 13,928	-\$ 0	0.0%	
Street Lighting	\$ 145,000	0.60	\$ 241,666	0.70	\$ 169,166	\$ 24,167	16.7%	
	<u>\$ 4,360,678</u>		<u>\$ 4,367,306</u>		<u>\$ 4,360,678</u>	<u>-\$ 0</u>	<u>0.0%</u>	

Out of Balance 0

Final ? Yes

A portion of page 14 from the Manager's summary is reproduced below.

Rate Class	2011 Ratio	2012 Ratio	Proposed 2013 Ratio	Target Range
Residential	1.09	1.08	1.0582	85 – 115
General Service Less Than 50 kW	0.88	0.88	0.88	80 – 120
General Service 50 to 4,999 kW	1.03	1.03	1.03	80 – 180
Street Lighting	0.50	0.60	0.70	70 – 120
Sentinel Lighting	0.70	0.70	0.70	70 – 120
Unmetered Scattered Load	0.80	0.80	0.80	80 – 120

Board staff notes that the proposed revenue-to-cost ratio for the residential rate class for the year 2013 in the Revenue-to-Cost Ratio Model is 1.07. Board staff further notes that in the Manager's Summary, ORPC has proposed a ratio of 1.0582.

- a. Please explain this discrepancy.

Response to Interrogatory 9:

The residential rate class for the year 2013 was incorrectly stated in the manager's summary and should be the proposed 1.07 as found in the Revenue-to-Cost Ratio Model.

10. Non-Loss Adjusted Metered Billed kWh and kW

Ref: RTSR Model

A portion of Sheet “4. RRR Data” from the RTSR Model 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	79,270,520		1.0390		82,362,070	-
General Service Less Than 50 kW	kWh	32,279,016		1.0390		33,537,698	-
General Service 50 to 4,999 kW	kW	74,853,997	203,575		50.40%	74,853,997	203,575
Unmetered Scattered Load	kWh	469,307		1.0390		487,610	-
Sentinel Lighting	kW	270,899	734		50.59%	270,899	734
Street Lighting	kW	2,458,955	6,840		49.27%	2,458,955	6,840

- a. Please confirm that the amounts entered into the columns “Non-Loss Adjusted Metered kWh” and “Non-Loss Adjusted Metered kW” have not been adjusted by ORPC’s Board-approved loss factor.

Response to Interrogatory 10:

Ottawa River Power Corporation confirms that the amounts entered as above have NOT been adjusted by ORPC’s Board-approved loss factor.