



PUBLIC INTEREST ADVOCACY CENTRE
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April 18, 2013

VIA MAIL and E-MAIL

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

Dear Ms. Walli:

Re: EB-2012-0175 West Coast Huron Energy Inc.

Please find enclosed the interrogatories of VECC in the above-noted proceeding.

Yours truly,

Michael Janigan
Counsel for VECC

Encl.

cc. West Coast Huron Energy Inc.
Attn: Mr. Wally Curry
Email: wcurry@erthcorp.com

REQUESTOR NAME	VECC
INFORMATION REQUEST ROUND NO:	# 1
TO:	West Coast Huron Energy Inc. (Goderich Hydro or WCHE)
DATE:	April 18, 2013
CASE NO:	EB-2012-0153
APPLICATION NAME	2013 Cost of Service Electricity Distribution Rate Application

1. GENERAL (Exhibit 1)

1.0-VECC- 1 Reference: Exhibits All

- a) Please provide a tracking sheet (table) showing all adjustments arising from the interrogatories (include Reference IR #.; Item description; area of change, i.e. return on capital/rate base/working capital allowance/amortization/PILS/OM&A/ etc.).
- b) Please update the RRWF Excel Live spread sheet for these adjustments.

1.0 – VECC – 2

Reference: Exhibit 1, Tab 2, Schedule 5

- a) Please provide the annual SAIDI, SAIFI and CAIDI statistics for 2009 through 2012 with and without supply loss.
- b) Please provide the causes of interruptions by the following categories (or similar categories if otherwise maintained by CWHE).

Description	2009 Totals	2010 Totals	2011 Totals	2012 Totals
Scheduled				
Supply Loss				
Tree Contact				
Lightning				
Def. Equip.(other than pole)				
Pole Failure				
Weather				
Human Element				
Animals, Vehicle				
Environment				
Unknown				
Total				

2. RATE BASE (Exhibit 2)

2.0-VECC – 3

Reference: Exhibit 2, Tab 2, Schedule 1 – Continuity Schedules

- a) Please provide an updated Fixed Asset Continuity Schedules for 2011 through 2013 (2012 CGAAP and MIFRS) which show the removal of all amounts being sought for recovery through the z-factor rate rider.
- b) Please update the 2012 continuity schedule to reflect the most recent actual year-to-date capital expenditures closed to rate base.
- c) Please confirm that the 2013 Fixed Asset Continuity Schedule opening balance includes smart meters costs and removes stranded meters costs.
- d) If the adjustments noted in c) have not been made please provide a 2013 continuity schedule which makes the adjustments.

2.0-VECC – 4

Reference: Appendix 2 WkForm_20121207 – Appendix 2-A –Capital Projects

- a) Please update Appendix 2-A (Capital Projects Table) for the 2012 actual capital spending (unaudited if audited figures are unavailable).
- b) Please update the 2013 capital spending as necessary for 2012 actuals.

2.0-VECC – 5

Reference: Appendix 2 WkForm_20121207 – Appendix 2-A

Pre-amble: The purpose of this interrogatory is to understand what projects and what associated capital project costs in each of 2011, 2012 and 2013 are being sought for recovery under the Z-Factor proposal.

- a) Please provide a revised capital expenditure table which identifies those projects (and their cost) in each of 2011, 2012 and 2013 which were undertaken as a result of storm damage in August 2011.
- b) Please reconcile and identify the capital projects in Appendix 2-A with the amounts being sought for recovery in the Z-Factor accounts shown at Exhibit 9, Tab 1, Schedule 5.

2.0-VECC – 6

Reference: Appendix 2 WkForm_20121207 – Appendix 2-A

- a) Please provide a table showing the capital contributions for 2009 through 2013 (forecast) along with the accounts they are related to.
- b) Please explain any substantive difference between the 2013 capital contribution forecast and the average contribution of the past four years.

2.0-VECC – 7

Reference: Appendix 2 WkForm_20121207 – Appendix 2-A

- a) Please explain why a further \$300,000 is being spent on a Line Bucket truck when similar equipment appears to have been purchased in 2009 for \$326,000?
- b) Please provide the inventory of fleet vehicles in 2011 (pre-storm) and the proposed inventory of vehicles in 2013.

2.0-VECC – 8

Reference: Appendix 2 WkForm_20121207 – Appendix 2-A / Exhibit 2, Tab1, Schedule 1

- a) The evidence states that WCHE will need to completely re-write its Asset Management Plan due to the 2011 storm. Did Goderich complete a comprehensive plan subsequent to its last cost of service filing? If yes, please file this plan
- b) Please explain why WCHE believes it is prudent (or necessary) to embark on a capital expenditure program which is significantly larger than its pre-storm capital programs.
- c) Please identify those capital programs in 2013 which WCHE believes must be undertaken to complete the replacement or refurbishment of assets damaged in 2011.

2.0-VECC – 9

Reference: Exhibit 2, Tab 1, Schedule 1; Appendix 2-A

- a) Please provide the capital and OM&A costs of the GEA plan for the period 2012 through 2016 (or confirm there are no costs related to the plan).

2.0- VECC - 10

Reference: Appendix 2 WkForm_20121207 – Appendix 2-A - Buildings

- a) Please provide the cost and descriptions of all new land acquisitions, building cost and furniture/office equipment costs (office and garage separately), for each of the years 2011 through 2013.

- b) Please provide a status report of the new facilities construction costs and expected occupancy dates.
- c) Please provide the value of all land abandoned, sold or otherwise not-utilized as part of the reconstruction of buildings.
- d) Please explain how any unused land and salvage has been accounted for in the Continuity Schedules and/or the Z factor request.

2.0-VECC – 12

Reference: Exhibit 4, Tab 2, Schedule 2

- a) Please confirm that all CWHE customers are billed monthly.

3. LOAD FORECAST (Exhibit 3)/ OPERATING REVENUE (Exhibit 3)

3.0-VECC – 13

Reference: Exhibit 3, Tab 1, Schedule 3

- a) Please provide a version of the “Summary of Operating Revenue Table” that clearly shows the values for all columns (Note: the Application’s table was cut off at the Bridge 2012 values column).

3.0 – VECC –14

Reference: Exhibit 3, Tab 2, Schedule 1

- a) Please confirm that the actual and forecast kWh and kW values referenced throughout this schedule are customer-delivered quantities and have not been marked up for distribution losses.
- b) Please provide a copy of the OPA’s final CDM report for WCHE for the period 2006-2010.
- c) Please provide a copy of the OPA’s final CDM report for WCHE for 2011.
- d) What is WCHE’s 2011-2014 cumulative kWh target as set by the Board?
- e) Please provide a schedule that sets out for 2012 and 2013 the CDM adjustment for each customer class and the total CDM adjustment for each of the two years.

- f) What is basis for the total CDM adjustment assumed for each of 2012 and 2013?
- g) What was the basis for apportioning the total CDM adjustment assumed for each of 2012 ad 2013 to customer classes?

3.0 – VECC –15

Reference: Exhibit 3, Tab 2, Schedule 1

- a) Is the IESO's June 2012 18 Month Outlook the most recent outlook available? If not please provide the most recent outlook available and indicate what the updated growth rates for 2012 and 2013 are.
- b) Please confirm that the June 2012 18 Month Outlook companion document – Ontario Demand Forecast (http://www.ieso.ca/imoweb/pubs/marketReports/18Month_ODF_2012jun.pdf) contains the following statement (page iii):
In the 18-Month Outlook the impacts of conservation and embedded generation are decremented from demand,
- c) As the IESO energy forecast already includes the impact of conservation, why is it necessary to further adjust WCHE's forecast for CDM impacts?
- d) Please provide a schedule that contrasts the year over year growth rates for 2007, 2008, 2009, 2010 and 2011 for each WCHE customer class (excluding Street Lighting, Sentinel Lighting and USL) with the historic energy growth rates reported by the IESO.

3.0 – VECC –16

Reference: Exhibit 3, Tab 2, Schedule 1 (Residential and GS<50)

- a) Why was 5 years used as “weather normal”?
- b) What would be the 10 year and 20 year average HDD and CDD values?
- c) Please explain more fully the derivation of the 1.5% adjustment factor per HDD for 2011.
- d) Please provide the supporting calculations showing the derivation of:
 - The 252,652 kWh HDD adjustment to Residential for 2011
 - The (204,670) kWh CDD adjustment to Residential for 2011

- e) Are the 2013 non-coincident or coincident peak values (Tables 6 and 9) for the Residential and GS<50 classes used anywhere in the Application (e.g., in the Cost Allocation)? If so, please explain where and how these values are used.
- f) What customer class' loads are included in the Net System Load Shape (NSLS)?
- g) Please confirm that the profile for the 2011 NSLS was applied to the forecast 2013 Residential and GS<50 sales in order to determine the non-coincident and coincident peak values set out in Tables 6 and 9. If not, please explain how these kW values were determined.

3.0 – VECC –17

Reference: Exhibit 3, Tab 2, Schedule 1 (GS>50)

- a) How was it determined that there was a meaningful relationship between daily kWh and CDD but not for HDD?
- b) Please provide a schedule that sets out the derivation of the 2011 kW CDD adjustment (i.e., 234 kW per Table 33).
- c) Please provide a schedule that sets out the derivation of the 2011 CDM kW adjustment (i.e., -26 kW per Table 35).

3.0 – VECC –18

Reference: Exhibit 3, Tab 2, Schedule 1 (GS 500-4,999)

- a) How was it determined that there was a meaningful relationship between daily kWh and CDD but not for HDD?
- b) Please explain the reference in Table 36 to kWh with 4.67% losses included.
- c) Was the regression analysis to determine the CDD adjustment factor (Figure 18) done using the kWh with or without the 4.67% losses included?
- d) Why is there no historical usage data for 2007 and 2008 (Tables 36 and 37)?
- e) How was the kW CDM adjustment for 2012 and 2013 determined?

3.0 – VECC –19

Reference: Exhibit 3, Tab 2, Schedule 1 (Large Use)

- a) Please explain the “New Mine” reference in Tables 38 and 39 for 2012?

- b) If this is a new customer, why doesn't the customer count for the class increase in 2012 and 2013?
- c) How were the kW CDM adjustments for 2012 and 2013 determined?

3.0 – VECC –20

Reference: Exhibit 3, Tab 2, Schedule 2

- a) Please provide a schedule that sets out the actual kWh sales by customer class for 2012.
- b) Using the weather normalization factors determined for each class please calculate and provide the actual weather normalized sales by customer classes for 2012.
- c) Are the customer counts shown in the "Customer Count Table" annual averages or year-end values?
- d) Please provide the actual 2011 and 2012 year end customer counts for each customer class.
- e) What is the basis for the forecast 2012 and 2013 customer counts for each class (i.e., how were the projected year over year changes in customer count determined)?

3.0 – VECC –21

Reference: Exhibit 3, Tab 3, Schedule 1 and Appendix 2-F

- a) Please explain why the forecast for Other Revenue for 2013 (\$104,000) does not include the following items from Appendix 2-F:
 - Non-Utility Rental Income (Account 4385).
 - Interest and Dividend Income (Account 4405).
- b) Where is the revenue from SSS Admin charges captured in Appendix 2-F and in Schedule 1?
- c) Does WCHE have any microFit customers? If so where is the monthly service charge revenue captured in Appendix 2-F and Schedule 1?

4. OPERATING COSTS (Exhibit 4)

4.0 - VECC- 22

Reference: Exhibit 4, Tab 2, Schedule 2

- a) Please explain why meter reading costs have increased since 2009 and notwithstanding the introduction of smart meters?
- b) Please compare and contrast the \$87k spent on meter reading in 2009 with the \$102K forecast spending in 2013.

4.0 - VECC- 23

Reference: Exhibit 4, Tab 2, Schedule 2

- a) Please provide a breakdown of Account 5310 (Customer Billing), which compares and explains the difference between the 2009 costs of \$274,605 and the 2013 forecast costs of \$382,300.

4.0 - VECC- 24

Reference: Exhibit 4, Tab 2, Schedule 2

- a) Please what portion of Account 5020 (Overhead Lines) is being undertaken to repair or replace storm damaged assets?
- b) What are the 2014 and 2015 forecast expenditures for Account 5020?

4.0 - VECC- 25

Reference: Exhibit 4, Tab 1, Schedule 5

- a) Please provide association fees paid to the EDA for each of the years 2009 through 2013 (forecast).
- b) Separately provide and describe the cost of all other association memberships.

4.0 - VECC- 26

Reference: Exhibit 4, Tab 1, Schedule 5

- a) What were (are) the annual wage increases for unionized staff for each of 2009 through 2014?

4.0 - VECC- 27

Reference: Exhibit 4, Tab 1, Schedule 5 – Appendix 2-K

- a) It appears from Appendix 2-K that no compensation was capitalized prior to 2010, but that approximately 15% of compensation costs has been capitalized beginning in 2011. Did WCHE make a change to its capitalization policy in 2010?

4.0 - VECC- 28

Reference: Exhibit 4, Tab 1, Schedule 5

- a) At account 5655 WCHE shows \$25,100 in regulatory costs which matches line 14 of Appendix 2-M. However this figure does not appear to recover the \$183,000 in one-time consulting costs (presumed to be related to the 2013 rate application). Please confirm the \$183,000 is for the 2013 application filing and that a portion of these costs are being recovered in 2013 rates.
- b) Please provide the total costs of the 2013 rate application filing broken down into the following categories: (1) consulting; (2) legal; (3) hearing/advertising and other costs; (4) intervenor costs
- c) Please provide how much of this budget has been spent to date.
- d) Please indicate over what time period (number of years) the one-time 2013 application costs will be recovered.

4.0 - VECC- 29

Reference: Exhibit 4, Tab 2, Schedule 2/ Appendix 2-G

- a) Account 5630 “Outside Services” shows a large increase in 2012 and 2013 as compared to previous years. What portion of the 2012 and 2013 increase was (is) related to storm related work?

- b) Account 5020 “Overhead Distribution –labour” shows a similar large increase in 2012 and 2013. What portion of the increase in each of these years is the result of storm damage work?
- c) When does WCHE expect to complete remedial work related to the 2011 storm damage?

4.0 - VECC- 30

Reference: Exhibit 4, Tab 1, Schedule 5

- a) Please explain the purpose in 2013 of account 5670 (rent) and 5672 (lease). In particular what buildings do they relate to.
- b) Are any of the payments made to an affiliate of WCHE?
- c) If these payments are made in respect to temporary locations used during the rebuilding of Goderich Hydro Offices/Garage please indicate when the payments are expected to end.

4.0-VECC – 31

Reference: Exhibit 4, Tab 2, Schedule 1

- a) Please explain why all the Bad Debt Expense appears to be an identical \$10,000.
- b) What was the actual bad debt expense in 2009 and 2012?

Cost of Capital (Exhibit 5)

5.0 - VECC- 32

Reference: Exhibit 5, Tab 1, Schedule 3

- a) Please update the cost of capital tables in Appendix 2-OA and the RRWF for the cost of capital parameters issued by the Board on February 14, 2013.
- b) In updating Appendix 2-OA please note that in the original filing the long-term and short term debt interest costs at Appendix 2-OA (\$283,491) does not equal the long and short term interest debt costs at Appendix 2-OB (\$273,954.44) and neither appear consistent with

the RRWF filed on December 5, 2012. If these are not consistent in the updated filings please explain why.

- c) Please update Appendix 2-OB (Debt Instruments) to show the most update interest rates and the terms of all loans. Please identify all the parties (i.e. lenders) in the table.
- d) In updating Appendix 2-OB please reconcile the table with the \$4,862,500 "*owing to the municipal shareholder and the Bank*" (Exhibit 5, Tab 1, Schedule 3) so as to show what is owed to the municipal shareholder and separately what portion is a loan (or loans) to the "Bank." Please identify all lenders and provide the current status of any loan negotiations including the current interest rate forecast.

5.0 - VECC- 33

Reference: Exhibit 5, Tab 1, Schedule 3

- a) Please explain why WCHE has not accessed Infrastructure Ontario lending facilities to finance the reconstruction of storm damaged or other plant additions. Please provide the interest rates offered by Infrastructure Ontario in 2011 when WCHE negotiated its bank loans.
- b) What is the current Infrastructure Ontario interest rate offered for loans similar to that being negotiated by WCHE?

5.0 - VECC- 34

Reference: Exhibit 5, Tab 1

- a) Please provide the actual and deemed rates of return on equity and capital for each of the years 2009 through 2012.

5.0 - VECC- 35

Reference: Exhibit 5, Tab 1, Schedule 3

- a) Please file the municipal loan agreement.
- b) What is the principal owing on this instrument? When was it issued and what is its term?.

5.0 - VECC- 36

Reference: Exhibit 5, Tab 1, Schedule 3/

- a) Please file the dividend policy of CWHE.

COST ALLOCATION (Exhibit 7)

7.0-VECC – 37

Reference: Cost Allocation Model

- a) With respect to Sheet I5.2 (Weighting Factors) – are the weighting factors for Services and Billing & Collecting based on the OEB's default values or are they specific to WCHE?
- b) Please explain why the GS<50 weighting factor for Billing & Collecting is less than that for Residential.
- c) With respect to Sheet I7.1 – please confirm that all GS<50 customers have the same type of smart meter as used for Residential customers? If not, please revise Sheet I7.1 accordingly.
- d) With respect to Sheet I7.2 – please explain why the unit meter reading cost for a GS<50 smart meter is less than that for a Residential smart meter.
- e) With respect to Sheet I8 – please explain why, for the GS<50 class, the Secondary and Line Transformer NCP values are less than the Primary NCP value when none of these customers own their own transformers (as opposed to the Residential class where the values are all the same).
- f) With respect to Sheet I6.2, is there a difference between the number of Street Light fixtures and the number of Street Light connections to WCHE's distribution system? If yes, please confirm that 1,298 represents the number of Street Light connections and not fixtures.

7.0-VECC – 38

Reference: Appendix 2-P

- a) With respect to Part D) – does WCHE propose to further adjust the ratios for GS<50, GS>50, GS 500-4999 and Large Users in 2014 and 2015 so as to bring them within the Board's policy ranges for the respective customer classes? If yes, please complete the 2014 and 2014 columns in the table. If not, why not?

- b) Please describe more fully the basis/rationale for increasing the ratios for Street Lighting, Sentinel Lighting and USL to values above the lower end of the Board's policy range for each class while proposing a ratio for Large Users that is below the lower end of the Board's policy range for that class.
- c) If the Large User ratio was increased to 85%, would the additional revenues be sufficient to permit the GS<50 ratio to be reduced to 120%?

RATE DESIGN (Exhibit 8)

8.0-VECC – 39

Reference: Exhibit 8, Tab 1, Schedule 5

- a) The discussion of Street Lighting suggests that the revenue to cost ratio is set at 70% - the bottom of the Board's policy range. Please confirm that the proposal is to increase the ratio to 72%.
- b) Please explain more fully why WCHE is proposing to increase the monthly fixed charge for Sentinel Lighting and eliminate the volumetric charge entirely.

8.0-VECC – 40

Reference: Exhibit 8, Tab 1, Schedule 9

- a) The RTSR model used by WCHE does not appear to have been updated for the approved 2013 UTRs. If this is the case, please update the model and indicate what the revised 2013 RTSRs would be.

8.0-VECC – 41

Reference: Appendix 2-R (Loss Factors)

- a) Please review and confirm the inputs to this Schedule, particularly those inputs impacting the derivation of Line G (Note – In most Applications this line works out to be 1 plus a fraction).

Deferral and Variance Accounts

9.0-VECC – 42

Reference: Exhibit 9, Tab 1, Schedule 1

- a) When does WCHE expect to file an application for PILs recovery?

9.0-VECC – 43

Reference: Exhibit 9, Tab 1, Schedule 5

In EB-2011-0335 the Board stated that: “ [It] expects *West Coast Huron to maintain records in a manner that will permit ready identification of each cost contained in this account, including the separate identification of any capital and non-capital cost components. The capital sub-account shall include capital assets that generally are included in the utility’s rate base for rate making purposes while the non-capital sub-account record the related annual incremental depreciation expense, operating and maintenance costs*”.

- a) Please provide a breakdown of the costs of \$1,252,730 and \$341,133 by USoA account. Please clearly delineate OM&A from asset costs.
- b) Have all the costs being sought for z-factor rider recovery been removed 2013 rate base and OM&A. Please demonstrate/explain.
- c) Please explain how the \$130k in lost revenues was derived.

9.0-VECC – 44

Reference: Exhibit 9, Tab 1, Schedule 5

- a) Please reconcile the amounts of \$1,991,821 (pg.19), with the amounts of \$1,252,730 and \$341,133 (pg. 20) and the amount of \$1,463,864 shown as being sought for recovery in account 1572 (pg.9).
- b) Please provide a description of the insurance benefits that were paid for storm damage. Please explain how these benefits were used to offset the amounts being sought for recovery either in the Z-factor or otherwise in the 2013 capital and OM&A budget.
- c) Who was WCHE property insurance carrier in 2011? Has this changed in 2013? What were the premiums in 2011 and what are the equivalent premiums forecast for 2013.

9.0-VECC – 45

Reference: Exhibit 9, Tab 1, Schedule 5

Chapter 3 of the Filing Requirements for Transmission and Distribution Applications (June 22, 2011) require that; *“As part of its claim, a distributor must outline the manner in which it intends to allocate the incremental revenue requirement to the various customer rate classes, the rationale for the selected approach and a discussion of the merits of alternative allocation methods. Recovery will be through a rate rider. The request must specify whether the rate rider(s) will apply on a fixed or variable basis or a combination thereof, and the length of the disposition period and a rationale for this proposal”* (pg. 16).

- a) Please provide the rationale for not using a demand component for the disposition of the z-factor amounts. In answering this question please answer the following: (1) what analysis, if any, was carried out on relationship between the assets that were affected by the storm and the customers being served; (2) why would it not be fair to charge more to customers who use the system more intensely; (3) is WCHE aware of any precedents to consider in the recovery of this type of costs?
- b) Please explain why a 4 year recovery period was chosen?

9.0-VECC – 46

Reference: Exhibit 9, Tab 1, Schedule 6

- a) WCHE has calculated a stranded meter based on customer number which arguably is not based on cost causality as required by OEB policy. Most utilities have chosen an allocation methodology based either: (a) actual recorded class meter costs; (b) most recent cost allocation; (c) combination of customer costs and smart meter class costs. Please provide the cost causality rationale for the proposed methodology.
- b) Has CWHE has considered any other methodology which better represents the cost variance as between residential and general service installed meter costs? If so please provide the output of these models.
- c) Please provide a summary of the stranded meter costs for recovery in the following form (figures are illustrative only).

Table 1: Stranded Meter Assets

Year	Notes	Cumulative Gross Asset Value	Cumulative Accumulated Amortization	Contributed Capital (Net of Amortization)	Net Asset	Proceeds on Disposition	Residual Net Book Value
		(A)	(B)	(C)	(D) = (A) - (B) - (C)	(E)	(F) = (D) - (E)
2006					\$ -	\$ -	\$ -
2007					\$ -	\$ -	\$ -
2008					\$ -	\$ -	\$ -
2009		\$ 664,055	\$ 246,718	\$ 2,657	\$ 414,680	\$ 5,223	\$ 409,457
2010		\$ 950,232	\$ 401,681	\$ 4,409	\$ 544,142	\$ 6,339	\$ 537,803
2011		\$ 1,221,695	\$ 511,911	\$ 4,409	\$ 705,375	\$ 6,339	\$ 699,036
2012	(1)	\$ 1,221,695	\$ 649,731	\$ 4,409	\$ 567,555	\$ 6,339	\$ 561,216

9.0-VECC – 47

Reference: Exhibit 9, Tab 1, Schedule 6

- a) Please provide the following information regarding smart meters:
- A summary table for 2009 through 2013 showing the number of installed smart meters by rate class and showing separately for 2011 the number of smart meters replaced due to storm damage.
 - A summary table of the cost claim of OM&A and capital cost for each class for the period ending December 31, 2012 and indicating whether this amount has been audited or not. The table should show the capital and OM&A costs separately for those smart meters replaced due to storm damage.
 - A summary table showing the average installed cost per meter by rate class and the total average installed cost per customer.
 - A description of any costs beyond minimum functionality.
 - A summary table showing the derivation of and Smart Meter Disposition Rate Rider being sought and which includes:
 - Deferred Smart Meter Revenue Requirement
 - Interest on deferred expenses
 - Smart Meter adder revenue

- iv. Meter customers per class over which costs are to be collected
- v. Weighted percentage by class or other allocation methodology
- vi. Proposed SMDR.

9.0-VECC – 48

Reference: Exhibit 9, Tab 1, Schedule 1

- a) For the last year in which mechanical meters were installed, what was the average installed cost for each class of the mechanical meters?

9.0-VECC – 49

Reference: Exhibit 9, Tab 1, Schedule 1

- a) We are unable to locate on the Board's website the Live Excel version of the Deferral/Variance Account Workform for 2013 Filers (EDDVAR model). We are only able to find a summary of the EDDVAR calculations at the file "COS DEC 17th responses 20130214-1" and the PDF version filed at Exhibit 9, Tab 1, Schedule 3. Please file a completed Excel EDVAR model that is in compliance with the Board filing guidelines.

9.0-VECC – 50

Reference: Exhibit 9, Tab 1, Schedule 3 (PDF pg.9)

- a) The Accounts requested for disposition at this reference do not appear to be consistent with that found in Excel spreadsheet COS DEC 17th responses 20130214-1 , under the "EDDVAR" tab. For example the latter shows an amount for recovery of account 1592 PILs while the

former does not. Please provide an updated table showing all the accounts being sought for disposition, the principal as of December 31, 2012, the interest as of December 31, 2012 and separately interest after the period after (i.e. update Table Accounts Requested for Disposition at Exhibit 9, Tab 1, Schedule 3 (PDF pg. 9) and reconcile this table with that shown in the EDDVAR tab of the Excel spreadsheet.

9.0-VECC – 51

Reference: Exhibit 9, Tab 1, Schedule 1

- a) Please confirm that WCHE adopted (M)IFRS accounting on January 1, 2013 and that 2012 was its transition year from CGAAP to MIFRS.
- b) Please confirm that WCHE is not applying for any costs related to making this transition. Have any amounts been recorded in account 1508 with respect to IFRS transition costs?

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