

PUBLIC INTEREST ADVOCACY CENTRE LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

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VIA E-MAIL

August 29, 2013

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

Dear Ms. Walli:

Re: COLLUS PowerStream (COLLUS)

2012 Distribution Rate Application (EB-2012-0116)

Questions for Technical Conference

Set out below are specific questions that the Vulnerable Energy Consumers Coalition (VECC) will be asking at the September 11th Technical Conference.

VECC continues to review the evidence and may at the Technical Conference (or before if possible) have further questions of clarification on all the issues responded to in the interrogatories.

Yours truly,

Michael Janigan Counsel for VECC Encl.

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COLLUS POWERSTREAM (COLLUS) 2013 RATE APPLICATION (EB-2012-0116) VECC TECHNICAL CONFERENCE QUESTIONS

NB: Numbering continues from last VECC Interrogatory # 40

GENERAL (Exhibit 1)

1.0-VECC TCQ - 41

Subject: PowerStream Transaction

Reference: 1-Energy Probe-4

a) Please provide the estimated cost savings associated with the use of PowerStream's control room expected in the fall of 2013.

1.0-VECC TCQ-42

Reference 1-Energy Probe-6

a) What are the annual incremental 2013 costs as compare to 2009 for IFRS Reporting?

OPERATING COSTS (Exhibit 2)

2-VECC TCQ- 43

Reference 4.0-VECC-23

a) When to the contacts referred to in this response (i.e. related to preparation of bills) expire?

2-VECC TCQ- 44

Reference 4.0-VECC-24

a) Did COLLUS produce a report for senior management, its Board or its shareholder which examined the potential impact on distribution rates of the PowerStream transaction? If so, please provide that report or presentation.

2-VECC TCQ- 43

Reference 4.0-VECC-32

- a) The correct reference is Exhibit 4, Tab 4, Schedule 5, page 3 Table 1 (also shown as Appendix K in Excel filing COLLUS_2013_Filing_Requirements_Chapter2_Appendices_Revised_20 130606). These tables show 2009 actual total FTEs in 2009 as 18.08 and the forecast 2013 total as 22.92 for a difference of 4.84)
 - Please provide a list of each of the positions for the 4.84 FTEs that have been added from 2009 actuals. Please provide the total amount of salary and benefits related to these FTEs.
- b) Please explain how the statement made at 4-Staff-25b:

Over the last five years only one entry level Customer Service Representative was hired and one operations support person to assist the Superintendent. All other positions in this category have remained the same.

is consistent with Appendix K which shows actual 18.08 FTEs in 2009 and 22.92 in 2013.

OPERATING REVENUE (Exhibit 3)

3.0-VECC TCQ - 44

Subject: Forecast Customer Count Reference: VECC #14 b) and #14 d)

Preamble:

In the response to VECC #14 b), COLLUS updated the forecast 2012 customer count for actual values. The counts for both the Residential and GS<50 classes are higher than those forecast for 2012 in the original application. In the response to VECC #14 d) there are new 2013 customer count values provided for Residential, GS<50, GS>50 and Street Lighting.

- a) Is COLLUS proposing to revise its 2013 customer count forecast to reflect the values shown in VECC #14 d)?
 - If yes, is the one customer reduction in GS>50 meant to reflect the loss of Nacan/Amaizeingly Green?
 - If not, shouldn't there be some revision to the 2013 customer count forecast to reflect the fact that the 2012 results for some classes are higher than the forecasted values in the Application?

3.0 - **VECCTCQ** - 45

Subject: Forecast kW Billing Values

Reference: Energy Probe #20 a) and VECC #16b)

Preamble: The responses to Energy Probe #20 a) and VECC #16 b) confirm

that the billing kW forecast for 2013 was based on the 5-year customer growth. However, the response to Energy Probe #20 a)

also provides a "revised" billing kW forecast for 2013.

a) Please confirm that by "customer growth" COLLUS means the growth in billing kW for the customer class and not customer count.

b) Please confirm whether COLLUS is proposing to revise its billing kW forecast for 2013 to reflect the values in Energy Probe #20 a) (i.e.,
 GS>50 – 337,058 kW and Street Lighting – 6,269 kW).

3.0 - VECC TCQ - 46

Subject: Historical 2011 CDM included in Load Forecast Model

Reference: Staff #14 b) and VECC #13 b)

Preamble: Staff #14 b) shows that the CDM add back for 2011 was 8,892,519

kWh (prior to losses) which included 3,194,455 kWh for 2011-2014 CDM. However, VECC #13 b) explains that the actual CDM

savings for 2011 were only 820,000 kWh and that the 3,194,455 kWh value represents the cumulative impact of the 2011 programs

over the 2011-2014 period.

a) Please explain why the adjustment to the 2011 purchases (in order to account for the 2011-2014 CDM programs) was not 820,000 kWh.

3.0 - VECC TCQ - 47

Subject: Historical 2012-2013 CDM included in Load Forecast Model

Reference: Staff #14 b), Staff 18 e) and VECC #13 e)

Preamble: Staff #14 b) shows that the CDM add back for 2012 was 8,245,542

kWh (prior to losses) which included 2,630,329 kWh for 2011-2014 CDM. However, the COLLUS_Power Stream Annual CDM Report for 2011 (VECC #13 e attachment, page 61) shows the 2,630,329 kWh value as being the cumulative 2011-2014 impact of the 2012 CDM programs. Similarly, the Annual CDM Report shows the planned cumulative 2011-2014 saving from the 2013 and 2014

- programs as being 5,150,426 kWh and 3,994,790 kWh respectively. The response to Staff 18 e) states that COLLUS would prefer to base its CDM adjustment on its CDM Strategy.
- a) Based on the Strategy provided in Annual CDM Report for 2011 what was the planned savings in 2012 from 2012 programs?
- b) Please confirm that the 2,630,329 kWh CDM adjustment shown in Staff #14 b) for 2012 represents the cumulative 2012-2014 impacts of the 2012 CDM programs.
- c) Please complete/correct the following Table based on the Strategy document provided in response to VECC #13 e) (*Note: The Table has been partially filled in based on the values provided in various interrogatory responses*):

Program					
Year					
	2011	2012	2013	2014	Total
			(Test		
			Year)		
2011	820,373	820,373	820,373	733,336	3,194,455
2012	-				2,630,329
2013	-	-			5,150,426
2014	-	-	-		3,994,790
Total CDM	820,373				14.97
Savings					GWh

Note

2011 values taken from Staff 14 b) and Staff 18 c). 2014 calculated as the difference between the total and 2011-2013.

2012-2014 totals taken from Staff 14 b).

d) Please confirm that it's the totals for each year's column (and not row) that represent the CDM savings for that year and therefore are the values that should be used for the CDM adjustment.

3.0 - VECC TCQ - 48

Reference: Staff #14 b), Staff 18 a) and VECC #13 e)

Preamble: Staff #18 a) provides the OPA's preliminary Report for 2012 for

COLLUS. It shows 1,200,000 kWh of CDM savings for 2012 which cumulatively will contribute 3,600,000 towards COLLUS' 2011-2014

target.

 a) Based on these preliminary 2012 results, please update/correct the Table from the preceding question:

Program Year					
	2011	2012	2013 (Test Year)	2014	Total
2011	820,373	820,373	820,373	733,336	3,194,455
2012	-	1,200,000	1,200,000	1,200,000	3,600,000
2013	-	-			
2014	-	-	-		
Total CDM Savings	820,373	2,020,373			14.97 GWh

Note: 2011 values taken from Staff 14 b) and Staff 18 c). 2014 calculated as the difference between the total and 2011-2013 values. 2012 totals taken from Staff 18 a).

3.0 - VECC TCQ - 49

Subject: LRAMVA values Reference: VECC #19 a) & c)

Exhibit 3, Tab 1, Schedule 5, page 2

- a) Please explain how the 2011 billing kW impacts for each CDM program (totaling 60 kW) were determined.
- b) With respect to the total of 10,740,068 kWh proposed for purposes of the LRAMVA, please explain why the results from the OPA programs (per 2011) and the 2011 actual results were included. Does COLLUS expect these values to be reviewed (and therefore potentially revised) at some point in time in the future?
- c) The LRAMVA needs billing kW values for those classes that are demand billed. With respect to the forecast CDM results for 2012 and 2013 (noting the 2012 reported results are "preliminary"), what are the 2013 billing kW impacts associated with the GS>50 and Street Lighting savings.

3.0 - VECC TCQ - 50

Subject: Other Operating Revenue Reference: Energy Probe #22 b) & f)

- a) Please confirm that if the forecast 2013 SSS Admin charge revenue was \$48,000 (i.e. the revised forecast value per Energy Probe #22 b)), then the total forecast 2013 Other Operating Revenue would be \$513,600 (i.e., \$465,600 + \$48,000).
- b) Please explain the material decrease in Miscellaneous Service Revenue (Account #4235-0000-00) as between the first half of 2012 and the first half of 2013 (per Energy Probe #22 f)).

COST ALLOCATION (Exhibit 7)

7.0-VECC TCQ - 51

Subject: Cost Allocation Model – Customer Count Input

Reference: Energy Probe #20 b)

a) Please confirm that the 114 value for the GS>50 customer count used in CA Model Sheet I6.2 needs to corrected.

7.0-VECC TCQ - 52

Subject: Cost Allocation Model – Services Weighting Factors

Reference: VECC #35 a)

a) Please explain why services weighting factors are not applicable to USL and Street Lighting.

7.0-VECC TCQ - 53

Subject: Cost Allocation Model – Meter Reading Weighting Factors

Reference: VECC #36 a)

a) Does the meter reading for GS>50 customers involve the collection and verification of hourly data? If not, at what level of resolution is the metering data for GS>50 collected?

b) For the Residential and GS<50 classes, what aspects of meter data verification are carried out by the SME (IESO) but need to be performed by COLLUS in the case of GS>50 customers?

c) Please explain why the costs of collecting and verifying smart meter data for Residential and GS<50 class customers exceeds the cost for GS>50 customers on a per customer basis.

RATE DESIGN (Exhibit 8)

8.0-VECC TCQ - 54

Subject: Existing Fixed-Variable Split

Reference: Staff #29 a)

a) The volumes by customer class presented in the response do not match those in Exhibit 3. Please reconcile and provide a revised calculation of the existing fixed-variable split for each customer class and update Table 1 (Exhibit 8, Tab 1, Schedule 2).

b) What impact, if any, do these revisions have on the proposed 2013 monthly service charges and volumetric rates as set out in Exhibit 8, Tab 1, Schedule 2, Tables 2 & 3 of the Application?

8.0-VECCTCQ -55

Subject: LV Charges
Reference: VECC #38 b)

 a) The original question asked for the 2012 actual LV charges (not billing quantities). Please provide the information as requested.

End of document