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Commission de l'énergie de l'Ontario

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BY E-MAIL

November 12, 2013

Kirsten Walli **Board Secretary** Ontario Energy Board 2300 Yonge Street, 27th Floor Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: **Lakefront Utilities Inc.** 

**2014 IRM Distribution Rate Application** 

**Board Staff Interrogatories Board File No. EB-2013-0148** 

In accordance with the Notice of Application and Hearing, please find attached Board Staff interrogatories in the above proceeding. Please forward the following to Lakefront Utilities Inc. and to all other registered parties to this proceeding.

In addition please advise Lakefront Utilities Inc. that responses to interrogatories are due by November 29, 2013.

Yours truly,

Original Signed By

**Christiane Wong** Information Administrator – Applications & Regulatory Audit

Encl.

# Lakefront Utilities Inc. ("LUI") 2014 IRM Rate Application EB-2013-0148 Board Staff Interrogatories

# 2014 RTSR Adjustment Work Form

1. Ref: A portion of Sheet 1 "Info" is reproduced below.



Board staff notes that LUI did not enter data in the "Last COS Re-based Year" while Board staff believes that LUI's last cost-of-service re-basing was in 2012 under proceeding EB-2011-0250<sup>1</sup>.

a) If this is an error, please provide the missing information, and Board staff will make the relevant correction.

<sup>1</sup> http://www.rds.ontarioenergyboard.ca/webdrawer/webdrawer.dll/webdrawer/rec/341505/view/

#### 2. Ref: A portion of Sheet 4 "RRR Data" 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	67,118,098		1.0565		70,910,271	-
General Service Less Than 50 kW	kWh	31,399,975		1.0565		33,174,074	-
General Service 50 to 2,999 kW	kW	128,532,327	322,334		54.65%	128,532,327	322,334
General Service 3,000 to 4,999 kW	kW	15,193,348	39,662		52.50%	15,193,348	39,662
Unmetered Scattered Load	kWh	593,911		1.0565		627,467	-
Sentinel Lighting	kW	41,938	114		50.42%	41,938	114
Street Lighting	kW	1,222,128	3,337		50.20%	1,222,128	3,337

- 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 LUI's Board-approved loss factor.
- b) Staff is unable to reconcile the non-loss adjusted metered kWh and the non-loss adjusted metered kW for the Residential, GS <50 kW, Unmetered Scattered Load and Sentinel Lighting rate classes with LUI's 2.1.5 RRR Report for 2012. Please provide evidence supporting these amounts. If necessary, Board staff will make the corrections.

# 2014 Tax Sharing Work Form

3. Ref: A portion of Sheet 3 "Re-Based Bill Det & Rates" is reproduced below.

Rate Group	Rate Class	Fixed Metric	Vol Metric
RES	Residential	Customer	kWh
GSLT50	General Service Less Than 50 kW	Customer	kWh
GSGT50	General Service 50 to 2,499 kW	Customer	kW
GSGT50	General Service 50 to 4,999 kW	Customer	kW
USL	Unmetered Scattered Load	Connection	kWh
Sen	Sentinel Lighting	Connection	kW
SL	Street Lighting	Connection	kW

a) Board staff notes that the rate class classification for "General Service 50 to 4,999 kW" does not match LUI's current Tariff of Rates and Charges. Staff believes the correct rate class classification is "General Service 3,000 to 4,999 kW". If this is an error, Board staff will make the necessary correction.

# 4. Ref: A portion of Sheet 5 "Z-Factor Tax Changes" is reproduced below

For the 41513 year, enter any Tax Credits from the Cost of Service Tax Calculation (Positive #)				
1. Tax Related Amounts Forecast from Capital Tax Rate Changes		2012		2014
Taxable Capital	\$	2,660,020	\$	2,660,020
Deduction from taxable capital up to \$15,000,000	\$	15,000,000	\$	15,000,000
Net Taxable Capital	-\$	12,339,980	-\$	12,339,980
Rate		0.000%		0.000%
Ontario Capital Tax (Deductible, not grossed-up)	\$	-	\$	-
2. Tax Related Amounts Forecast from Income Tax Rate Changes		2012		2014
Regulatory Taxable Income	\$	142,661	\$	142,661
Corporate Tax Rate		15.50%		15.50%
Tax Impact	\$	22,112	\$	22,112
Grossed-up Tax Amount	\$	26,168	\$	26,169
Tax Related Amounts Forecast from Capital Tax Rate Changes	\$	_	\$	-
Tax Related Amounts Forecast from Income Tax Rate Changes	\$	26,168	\$	26,169
·				20,100
Total Tax Related Amounts	\$	26,168	\$	26,169
Incremental Tax Savings			\$	•
Sharing of Tax Savings (50%)			\$	

# Ref: A portion of Sheet 5 of the Revenue Requirement Work Form is reproduced below ("RRWF") EB-2011-0250

Line No.	Particulars	Application	Settlement Agreement	Per Board Decision
	<b>Determination of Taxable Income</b>			
1	Utility net income before taxes	\$671,593	\$644,238	\$644,238
2	Adjustments required to arrive at taxable utility income	(\$479,707)	(\$523,689)	(\$523,689
3	Taxable income	\$191,886	\$120,548	\$120,548
	Calculation of Utility income Taxes			
4	Income taxes	\$29,742	\$18,685	\$18,685
6	Total taxes	\$29,742	\$18,685	\$18,685
7	Gross-up of Income Taxes	\$5,456	\$3,427	\$3,427
8	Grossed-up Income Taxes	\$35,198_	\$22,112	\$22,112

Board staff notes some discrepancies in the Tax Sharing Work Form.

a) Please provide an explanation of \$142,661 for "Regulatory Taxable Income" with the \$120,548 as per RRWF and \$26,168 for "Grossed-up Tax Amount" with the \$22,112 as per RRWF. If this is an error, Board staff will update your work form.

#### 2014 IRM Rate Generator Work Form

Ref: Rate Generator Model Ref: LUI's current Tariff of Rates and Charges

A portion of Sheet 4 "Current Tariff Schedule" is reproduced below.

MONTHLY RATES AND CHARGES - Regulatory Component	
Wholesale Market Service Rate	0.0044
Rural Rate Protection Charge	0.0012
Standard Supply Service - Administrative Charge (if applicable)	0.2500

A portion of LUI's current Tariff of Rates and Charges is reproduced below

MONTHLY RATES AND CHARGES – Regulatory Component					
Wholesale Market Service Rate Rural Rate Protection Charge	\$/kWh \$/kWh	0.0044 0.0012			
Standard Supply Service – Administrative Charge (if applicable)	\$	0.25			

a) Board staff notes that LUI did not enter the units for "Wholesale Market Service Rate", "Rural Rate Protection Charge" and "Standard Supply Service – Administrative Charge (if applicable)" for all the rate classes. Board staff believes the correct unit is "\$/kWh" for "Wholesale Market Service Rate" and "Rural Rate Protection Charge" and "\$" for "Standard Supply Service – Administrative Charge (if applicable)". If this is an error, Board staff will make the correction.

6. Ref: A portion of Sheet 4 "Current Tariff Schedule" is reproduced below.

GENERAL SERVICE 50 TO 2,999 KW Service Classification			
Rate Rider for Disposition of Global Adjustment Sub-Account (2011) - effective until April 30, 2016 Applicable only for Non-RPP Customers	\$/kW	(0.0723)	

a) Board staff notes that the description for "Rate Rider for Disposition of Global Adjustment Sub-Account (2011) – effective until April 30, 2016 Applicable only for Non-RPP Customers" does not match with LUI's last Board-approved Tariff of Rates and Charges. Board staff notes that the correct description is "Rate Rider for Disposition of Global Adjustment Sub-Account (2012) – effective until April 30, 2016 Applicable only for Non-RPP Customers". If this is an error, Board staff will make the necessary correction.

7. Ref: A portion of Sheet 4 "Current Tariff Schedule" is reproduced below.

UNMETERED SCATTERED LOAD Service Classification						
MONTHLY RATES AND CHARGES - Delivery Component (If applicable, Effective Date	MUST be inc	luded in rate de	scri			
Distribution Volumetric Rate	\$/kW	0.0354				
Low Voltage Service Rate	\$/kW	0.0015				
Rate Rider for Deferral/Variance Account Dispositon (2012) - effective until April 30, 2016	\$/kW	(0.0020)				
Rate Rider for Disposition of Global Adjustment Sub-Account (2012) - effective until April 30, 2016 Applicable only Non-RPP Customers	for \$/kW	(0.0002)				
Rate Rider for Disposition of Deferral/Variance Accounts (2013) - effective until April 30, 2014	\$/kW	(0.0002)				
Retail Transmission Rate - Network Service Rate	\$/kW	0.0076				
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kW	0.0060				

A portion of LUI's current Tariff of Rates and Charges is reproduced below.

UNMETERED SCATTERED LOAD SERVICE CLASSI MONTHLY RATES AND CHARGES – Delivery Component	FICAT	ION
Distribution Volumetric Rate	\$/kWh	0.0354
Low Voltage Service Rate	\$/kWh	0.0015
Rate Rider for Disposition of Deferral/Variance Account (2012) – effective until April 30, 2016 Rate Rider for Global Adjustment Sub Account Disposition – effective until April 30, 2016	\$/kWh	(0.0020)
Applicable only for Non-RPP Customers	\$/kWh	(0.0002)
Rate Rider for Disposition of Deferral/Variance Account (2013) – effective until April 30, 2014	\$/kWh	(0.0002)
Retail Transmission Rate – Network Service Rate	\$/kWh	Ò.0076 ´
Retail Transmission Rate – Line and Transformation Connection Service Rate	\$/kWh	0.0060

a) Board staff notes that the unit for Unmetered Scattered Load service classification does not match LUI's current Tariff of Rates and Charges. Staff believes the correct unit for Unmetered Scattered Load service classification is "\$/kWh". If this is an error, Board staff will make the necessary correction.

# 8. Ref: A portion of Sheet 5 "2014 Continuity Schedule" is reproduced below

			2	013		Projected Inte	erest on Dec-31-	12 Balances	2.1.7 RRR	
Account Descriptions	Account Number	Principal Disposition during 2013 - instructed by Board	Interest Disposition during 2013 - instructed by Board	Closing Principal Balances as of Dec 31-12 Adjusted for Dispositions during 2013	Closing Interest Balances as of Dec 31-12 Adjusted for Dispositions during 2013	Projected Interest from Jan 1, 2013 to December 31, 2013 on Dec 31 -12 balance adjusted for disposition during 2013 <sup>3</sup>	Projected Interest from January 1, 2013 to April 30, 2013 on Dec 31 -12 balance adjusted for disposition during 2013 <sup>3</sup>	Total Claim	As of Dec 31-12	Variance RRR vs. 2012 Balance (Principal + Interest)
Group 1 Accounts										
LV Variance Account	1550			20,517	(1,852)	302	101	19,067	18,665	
RSVA - Wholesale Market Service Charge	1580			(561,377)	(7,166)	(8,252)	(2,751)	(579,546)	(568,543)	0
RSVA - Retail Transmission Network Charge	1584			(22,504)	(2,016)	(331)	(110)	(24,961)	(24,520)	0
RSVA - Retail Transmission Connection Charge	1586			3,731	(1,854)	55		1,950	1,877	0
RSVA - Power (excluding Global Adjustment)	1588			1,169,452	(43,747)	17,191	5,730	1,148,627	801,243	(324,462)
RSVA - Global Adjustment	1589			(1,212,757)	(17,721)	(17,828)	(5,943)	(1,254,248)	(1,230,478)	0
Recovery of Regulatory Asset Balances	1590			0		0	0	0		0
Disposition and Recovery/Refund of Regulatory Balances (2008) <sup>5</sup>	1595			3,552	(3,552)		_	O.		0
Disposition and Recovery/Refund of Regulatory Balances (2009) <sup>5</sup>	1595			(361,409)	(5,041)	(5,313)	(1,771)	(373,534)	(366,448)	2
Disposition and Recovery/Refund of Regulatory Balances (2010) <sup>5</sup>	1595			444,911	9,263	3,270	2,180	459,624	454,174	0
Disposition and Recovery/Refund of Regulatory Balances (2011) <sup>5</sup>	1595			(958,829)	(49,785)	(7,047)	(4,698)	(1,020,360)	(1,008,614)	0
Group 1 Sub-Total (including Account 1589 - Global Adjustment) Group 1 Sub-Total (excluding Account 1589 - Global Adjustment) RSVA - Global Adjustment	1589	0 0 0	0 0	(1,474,713) (261,956) (1,212,757)	(123,471) (105,750) (17,721)	(17,953) (126) (17,828)	(7,243) (1,301) (5,943)	(1,623,380) (369,132) (1,254,248)	(1,922,644) (692,166) (1,230,478)	(324,460) (324,460) 0
Deferred Payments in Lieu of Taxes	1562			362,550	53,754	0	0	O	416,304	0
Total of Group 1 and Account 1562		0	0	(1,112,163)	(69,717)	(17,953)	(7,243)	(1,623,380)	(1,506,340)	(324,460)
Special Purpose Charge Assessment Variance Account <sup>4</sup>	1521	(60,333)	(799)	42,909	221	0	0	0	(18,023)	
LRAM Variance Account <sup>6</sup>	1568	7,597	261	(23,877)	(351)	0	0	(24,228)	(16,370)	(
Total including Accounts 1562 and 1568		7.597	261	(1.136.040)	(70.068)	(17.953)	(7.243)	(1.647.608)	(1.522.710)	(324,460)

Board staff notes there is a variance amount of (\$324,462) in account 1588.

a) Please explain the adjustments which resulted in the above variance account by providing journal entries in accounts 1588 and 1589 and provide reason for entries.

9. Ref: Manager's Summary, Account 1588, page 8 of 117

Board staff notes that in the Manager's Summary, LUI stated that "At this time Lakefront has determined the error in the schedules and has confidence that a debiting entry of \$330,676 is to be made to balance the Power and Expense accounts for the year 2012 fiscal year...."

a) Please provide a detailed calculation of the referenced debiting entry of \$330,676.

### 10. Specific Service Charge

Ref: Rate Generator Model

Ref: LUI's current Tariff of Rates and Charges

A portion of Sheet 10 "Other Charges & LF" is reproduced below

Non-Payment of Account		
Late Payment – per annum	%	1.50

A portion of LUI's current Tariff of Rates and Charges is reproduced below

SPECIFIC SERVICE CHARGES		
Non-Payment of Account  Late Payment - per month	%	1.50

a) Board staff notes that with respect of "Late Payment – per annum", the descriptor does not match LUI's current Tariff of Rates and Charges. Staff believes the correct descriptor is "Late Payment – per month". If this is an error, Board staff will make the necessary correction.

#### 11. A portion of Sheet 8 "Calculation of Def-Var RR" is reproduced below

Please indicate the Rate Rider Recovery P	eriod (in years)	1		
Rate Class	Unit	Billed kWh	Deferral/Variance Account Rate Rider	Global Adjustment Rate Rider
RESIDENTIAL	\$/kWh	73,125,152	(0.0015)	(0.0089)
GENERAL SERVICE LESS THAN 50 KW	\$/kWh	35,160,634	(0.0015)	(0.0089)
GENERAL SERVICE 50 TO 2,999 KW	\$/kW	120,608,902	(0.5843)	(3.5159)
GENERAL SERVICE 3,000 TO 4,999 KW	\$/kW	19,295,356	(1.0543)	(3.5999)
UNMETERED SCATTERED LOAD	\$/kWh	716,623	0.0000	(0.0089)
SENTINEL LIGHTING	\$/kW	78,431	(0.2167)	(3.1844)
STREET LIGHTING	\$/kW	1,215,575	(0.6422)	(3.2184)
microFIT				
Total		250,200,673		

#### A portion of Sheet 11 "Proposed Rates" is reproduced below

GENERAL SERVICE LESS THAN 50 KW SERVICE CLASSIFIC	ATION	
MONTHLY RATES AND CHARGES - Delivery Component		
Rate Rider for Deferral/Variance Account Disposition (2014) - effective until April 30, 2015	\$/kWh	0.00620
Rate Rider for Global Adjustment Sub-Account Disposition (2014) - effective until April 30,		
2015 Applicable only for Non-RPP Customers	\$/kWh	0.00450
UNMETERED SCATTERED LOAD SERVICE CLASSIFICATION		
MONTHLY RATES AND CHARGES - Delivery Component		
Rate Rider for Global Adjustment Sub-Account Disposition (2014) - effective until April 30,		
2015 Applicable only for Non-RPP Customers	\$/kWh	0.00560

- a) Board staff notes that the rates for General Service less than 50 kW on Sheet 8 "Rate Rider for Deferral/Variance Account (2014) effective until April 30, 2015" does not match with Sheet 11 "Proposed Rates". Staff believes the correct rate is (0.0015) instead of (0.0062). If this is an error, Board staff will make the necessary correction.
- b) Board staff notes that the rates for General Service less than 50 kW on Sheet 8 "Rate Rider for Global Adjustment Sub Account Disposition – effective until until April 30, 2015 Applicable only for Non-RPP Customers" does not match with Sheet 11 "Proposed Rates". Staff believes the correct rate is (0.0089) instead of (0.0045). If this is an error, Board staff will make the necessary correction.
- c) Board staff notes that the rates for Unmetered Scattered Load on Sheet 8 "Rate Rider for Global Adjustment Sub Account Disposition (2014) effective until April 30, 2015 Applicable only for Non-RPP Customers" does not match with Sheet 11. Staff believes the correct rate is (0.0089) instead of (0.0056). If this is an error, Board staff will make the necessary correction.

#### 12. Revenue-to-Cost Ratio Work Form

#### Ref: A portion of Sheet 6 "Decision Cost Revenue Adj" is reproduced below.

		Current Year	Transition	Transition	Transition	Transition	Transition
Rate Class	Direction		Year 1	Year 2	Year 3	Year 4	Year 5
		2012	2013	2014	2015	2016	2017
Residential	No Change	89.90%	89.90%	89.90%	89.90%	89.90%	89.90%
General Service Less Than 50 kW	No Change	99.64%	99.64%	99.64%	99.64%	99.64%	99.64%
General Service 50 to 2,999 kW	Rebalance	139.13%	tbd	tbd	tbd	tbd	tbd
General Service 3,000 to 4,999 kW	Change	57.50%	63.13%	68.75%	74.38%	80.00%	80.00%
Unmetered Scattered Load	No Change	81.94%	81.94%	81.94%	81.94%	81.94%	81.94%
Sentinel Lighting	No Change	117.24%	117.24%	117.24%	117.24%	117.24%	117.24%
Street Lighting	No Change	111.73%	111.73%	111.73%	111.73%	111.73%	111.73%

a) The Board IRM Model's Revenue-to-Cost Ratio Work Form, Sheet 6,Cell E21 is labelled as "Current Year 2012". The column heading should have read "Current Year 2013". The numbers inputted by LUI in column E represent the 2012 rate year. The correct inputs should have been related to the 2013 year. Please update and resubmit the Revenue-to-Cost ratio Work Form and IRM Model.

# 13. A portion of Sheet 7 "Revenue Offsets Allocation" is reproduced below

Rate Class	Informational Filing Revenue Offsets A	Percentage Split C= A / B	Allocated Revenue Offsets E = D * C		
Residential	263,995	45.64%	172,714		
General Service Less Than 50 kW	87,102	15.06%	56,985		
General Service 50 to 2,999 kW	106,181	18.36%	69,467		
General Service 3,000 to 4,999 kW	56,256	9.72%	36,804		
Unmetered Scattered Load	10,524	1.82%	6,885		
Sentinel Lighting	1,088	0.19%	712		
Street Lighting	53,338	9.22%	34,895		
	578,484	100.00%	378,462		
	В	_	D		

a) Board staff has been unable to verify the figures in column A (Informational Filing Revenue Offsets) for the various rate classes. Please provide evidence supporting these amounts.

14. Lost Revenue Adjustment Mechanism Variance Account ("LRAMVA")

Ref: Page 10 of 117, LRAMVA

Ref: Table 2: 2012 LRAMVA Principal Calculation (A)

CDM in Load Forecast (CLF)												
							EB2010-00	95	EB-2011-0	250		
	EB-2011-0250						2011		2012			
	CDM Com Approved 0 2012	EB Forecast		al Annual port	Energy Vo Calculate	- 1	Volume	bution tric Rate • <b>Apr)</b>	Distribution Volumetric Rate (May - Dec)		Entry for 1568 LRAM Account	
Customer Class	kWh	kW	kWh	kW	kWh	kW	kWh	kW	kWh	kW	kWh	kW
Residential	1,049,050	0	155,205	35	(893,845)	35	\$0.0134		\$0.0143		(\$12,513.83)	
General Service <50 kW	504,413	0	110,062	28	(394,351)	28	\$0.0081		\$0.0082		(\$3,220.53)	
General Service > 50 - 4,999 kW	1,019,118	2,566	408,833	179	(610,285)	(2,387)		\$3.4201		\$3.4067		(\$8,142.4
General Service > 5 kW	0	0	0	0	0	0		\$1.0268		\$1.5830		\$0.0
entinel Lighting	0	0	0	0	0	0		\$11.4737		\$11.5631		\$0.0
treet Lighting	0	0	0	0	0	0		\$24.3414		\$24.4721		\$0.0
Unmetered Scattered Load	0	0	0	0	0	0	\$0.0293		\$0.0352		\$0.00	
Total	2,572,581	2,566	674,100	242	(1,898,481)	(2,324)					(\$15,734.36)	(\$8.142.4F

Lakefront is requesting the disposition of its LRAMVA of a total credit to customers of \$24,227.81 which includes carrying charges of \$350.99. Board staff is having difficulties reconciling and confirming the verified 2012 net savings used in Lakefront's LRAMVA calculations as the amounts have only been provided by customer class with no program specific savings results shown.

- a) Please confirm that Lakefront has relied on the OPA's 2012 Verified Results in calculating its LRAMVA amount.
- b) Please discuss if persisting 2011 savings in 2012 have been included in the LRAMVA calculations. If they have not, please include these savings amounts.
- c) Please expand "Table 2: 2012 LRAMVA Principal Calculation (A)" and show the savings by program for each customer class that were used to calculate the LRAMVA amount.
- d) Please provide any applicable updates to the total LRAMVA amount and subsequent rate riders due to the calculations performed in (a) and (b) above.

Lakefront Utilities Inc. 2014 Electricity Distribution Rates EB-2013-0148 Board Staff Interrogatories

e) Please separate the LRAMVA rate rider from the Group 1 DVA rate rider and confirm that Lakefront is seeking disposition over a one-year period.