



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

ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: piac@piac.ca. <http://www.piac.ca>

Michael Janigan
Counsel for VECC
(613) 562-4002 ext 26

November 19, 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: Vulnerable Energy Consumers Coalition (VECC)
Submission of VECC Interrogatories EB-2013-0166
PowerStream Inc.

Please find enclosed the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

VECC has reviewed the interrogatories of Board Staff, Energy Probe and SEC before filing its interrogatories as an effort to avoid duplication.

Thank you.

Yours truly,

Michael Janigan
Counsel for VECC
Encl.

Cc: PowerStream Inc.

ONTARIO ENERGY BOARD

IN THE MATTER OF

the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15 (Schedule B), as amended;

AND IN THE MATTER OF an Application by
PowerStream Inc. for an order or orders
approving or fixing just and reasonable
distribution rates to be effective January 1, 2014.

Information Requests of the Vulnerable Energy Consumers Coalition (VECC)

VECC Question # 1

Reference: Management Summary, Page 13

Preamble: PowerStream indicates that both the risk of not completing a project and the value of completing a project are considered.

- a) Please explain how the value of completing the project is considered in the review process to prioritize projects.

VECC Question # 2

Reference: Management Summary, Pages 15-16

Preamble: PowerStream indicates it has used the criteria for non-discretionary that was accepted by the Board in Toronto-Hydro Electricity Systems Limited rate case (EB-2012-0064).

- a) For each of the projects listed in Table 4-2 on Page 14, please indicate which of the THESL's five criteria apply to each project.

VECC Question # 3

Reference: Appendices G-1 to G-5, Appendix H

- a) Please identify the projects that could be categorized as unusual and unanticipated.

VECC Question # 4

Reference: 2014 IRM Application & EB-2012-0161 Decision and Settlement Agreement

- a) What is the year to date and projected year end capital expenditures for 2013?
- b) What is the year to date and projected year end in-service additions to rate base for 2013, net of capital contributions.

VECC Question # 5

Reference: Appendix G-1, Page 2, Pole Replacement Program

- a) Please provide a breakdown of the 2014 capital budget between category 1 (256 poles) and category 2 (144 poles) pole replacements.

VECC Question # 6

Reference: Appendix G-2, Page 7, Table 4, Cable Remediation

- a) Please provide the year to date failure history for 2013.

VECC Question # 7

Reference: Appendix G-2, Table 2 & Table 3, Cable Remediation

Preamble: VECC calculates that the cost per metre for 2014 cable injection projects is \$69 compared to \$261 per metre for 2014 cable replacement projects.

- a) Please provide the cost per metre for injection and replacement for the years 2009 to 2013 and discuss any variances.
- b) Please provide a breakdown of the \$/m for the 2014 cable injection and cable replacement projects in terms of design cost, labour cost, contract cost and material cost.

VECC Question # 8

Reference: Appendix G-2, Page 7, Cable Remediation

Preamble: PowerStream has calculated that the cable remediation program will save over 450,00 CMI versus a “do nothing” approach and the CMI saved is expected to provide an equivalent customer monetary value (outage avoidance) in the order of \$4M.

- a) Please provide the calculations and assumptions underlying the above savings.

VECC Question # 9

Reference: Appendix G-3, Switching Units and Transformers

- a) Page 1 – Please provide the weightings for each of the factors used to calculate the switchgear asset health index.
- b) Page 1 - Please discuss how a “poor” health index condition is determined for switchgear.
- c) Page 2 - Please provide the weightings for each of the factors used to calculate the Mini-rupter asset health index.
- d) Page 2 - Please discuss how a “poor” health index condition is determined for Mini-rupters.
- e) Please confirm the number of padmount switchgears and Mini-rupter switches in the system, the quantity of each that have a “poor” health index condition, and how PowerStream determined which of those should be replaced in 2014.
- f) Page 3 - Please discuss how a “poor” health index condition is determined for Submersible Transformers.
- g) Page 4 – Please provide the 2013 year to date switchgear failures.
- h) Page 5 – Please confirm the number of submersible transformers in the system, the quantity that have a “poor” health index condition, and how PowerStream determined which of those should be replaced in 2014.
- i) Page 7, Reliability Benefit - Please provide the calculations and assumptions underlying the CMI savings and equivalent customer monetary value identified.

VECC Question # 10

Reference: Appendix G-4, Station and Automated Switch Replacement

- a) Page 2 – For each of the projects, please identify the condition rating as Category 1 or Category 2.
- b) Page 4 – For the Planned Circuit Breaker Replacement Markham TS#1 – Bus #2, please provide additional details on the health index assessment as well as the historical failures.
- c) Page 4 - Please confirm the number of RTUs in the system, the quantity that are at end of life, the quantity that have been replaced in each of the years 2009 to 2013, and how PowerStream determined which of those should be replaced in 2014.

VECC Question # 11

Reference: Appendix K

- a) Please confirm the LRAM claim reflects the measure lives and unit savings related to the Every Kilowatt Counts program that have expired beginning in 2010, noting that the input assumptions including the measure life, unit kWh savings and free ridership for Compact Fluorescent Lights (CFLs) and Seasonal Light Emitting Diodes (LED) were changed in 2007 and again in 2009.
- b) Please adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired starting in 2011.