



**PUBLIC INTEREST ADVOCACY CENTRE
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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 20, 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-2013-0178
Wellington North Power 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 and Energy Probe before filing its interrogatories as an effort to avoid duplication.

Thank you.

Yours truly,

A handwritten signature in black ink, appearing to be 'Michael Janigan', written over a horizontal line.

Michael Janigan
Counsel for VECC
Encl.

Cc: Wellington North Power 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
Wellington North Power Inc. for an order or orders
approving or fixing just and reasonable
distribution rates to be effective May 1, 2014.

Information Requests of the Vulnerable Energy Consumers Coalition (VECC)

VECC Question # 1

Reference: Exhibit 5, Incremental Capital Module

- a) Please confirm the actual station age and transformer age at each of the six Substations.
- b) Page 60 – please identify the types of deficiencies where Wellington North has the capability (i.e. knowledge, training and expertise) to address the deficiencies.
- c) Page 60 – please identify the types of deficiency where Wellington North does not have the capability (i.e. knowledge, training and expertise) to address the deficiencies.
- d) Page 63 – Under alternative #3, when does Wellington North estimate the transformer would need to be replaced?
- e) Please summarize Wellington North’s assessment of the risk of major equipment failure for each station for Station MS2 and MS4 assuming none of the proposed rehabilitation/replacement work was completed.

VECC Question # 2

Reference: Exhibit 5, Substation Assessment Report (Costello Utility Consultants) June 2013

- a) Page 70 Maintenance Program – Please confirm the frequency of Wellington North’s current regular maintenance schedule.
- b) Page 70 Aging Plant - Please comment on the increase in the cost of metals over the past five years and its impact on the replacement cost of Substation equipment,

and if this trend is expected to continue.

- c) Page 71 – Please confirm the frequency of Wellington North’s ongoing asset condition assessments.
- d) Page 71 – Please discuss Wellington North’s response to the following recommendations provided by Costello:
 - perform a detailed review of the 44 and 4.16 kV feeder protection and coordination
 - develop a long term forecast for the budgeting and execution of station replacement projects
 - develop a short term work plan to make necessary repairs

VECC Question # 3

Reference 1: Substation Assessment Report (Costello Utility Consultants) June 2013, Page 69

Reference 2: Exhibit 5, Incremental Capital Module, Page 56

Reference 3: Substation Assessment Report (Costello Utility Consultants) June 2013, Page 68

Preamble: At reference 1, Substation MS4 is classified as red due to the age of the transformer, the system neutral connection and the diagnostic test results. At reference 2, Wellington North indicates substation MS4 should be marked for replacement in the near future (2016). At reference 3, Substation MS2 has a rating of red that can be improved to a yellow once the safety issues are resolved and switchgear efficiencies are corrected.

- a) If Wellington North is suggesting 2016 as the replacement year for Substation MS4 with a final red rating, why isn’t the suggested year of replacement for Substation MS2 beyond 2016 given the potential to move from a red to a yellow rating once issues are resolved/corrected?