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December 2, 2013

Ms. Kirsten Walli Board Secretary Ontario Energy Board PO Box 2319 26<sup>th</sup> Floor 2300 Yonge Street Toronto, ON M4P 1E4

#### Re: Ottawa River Power Corporation 2014 Distribution Rate Application EB-2013-0163

Dear Ms. Walli:

Ottawa River Power Corporation (ORPC) is pleased to submit response to the Board Staff interrogatories issued November 5<sup>th</sup> for the 2014 Distribution Rate Application.

Ottawa River Power Corporation respectfully submits this response for your consideration.

Kind Regards,

Denis Montgomery President

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This document is being filed pursuant to the Board's e-Filing Services.

# **IR Response Submission**

### Introduction

Ottawa River Power Corp. ("ORPC") filed an application (the "Application") with the Ontario Energy Board (the "Board") on October 7, 2013, under section 78 of the Ontario Energy Board Act, 1998, seeking approval for changes to the distribution rates that ORPC charges for electricity distribution, to be effective May 1, 2014. The Application is based on the 2014 IRM Distribution Rate Application.

The purpose of this document is to reply to Board staffs submission dated November 5th, 2013.

Board staff made a detailed submission on the following matters:

- 1. Billing Error Adjustments;
- 2. Projected Interest;
- 3. Metered kWh and kW;
- 4. Specific Service Charge;
- 5. Non-Loss Adjusted metered Billed kWh and kW;
- 6. USL Rate Class Tax Savings Model and;
- 7. Revenue Cost Ratios.

#### 1. Billing Error Adjustments

Board staff notes that ORPC's letter to the Board and the Manager's Summary, state that ORPC discovered a billing error that affected one of its larger customers.

a. Please confirm that two adjustments totalling \$55,523 are the only adjustments that ORPC identified and there is no other adjustment that will change the total claim.

# Ottawa River Power Corporation confirms that only two adjustments totalling \$55,523 are the only adjustments.

b. Please provide the following information with respect to the billing error that was discovered by ORPC:

- i) The billing period that was impacted by the billing error;
- ii) The reason(s) for the billing error, e.g., wrong quantity, wrong rate, etc.; and
- iii) The date that ORPC discovered the billing error.

We were informed by ORPC staff in Almonte, in late July 2013, of a power quality issue at the Almonte General Hospital. We installed a data recorder on July 30<sup>th</sup> to gather information relating to the input supply at the Hospital. The data was downloaded from the data recorder seven days later and compared to the billing data that was imported from our Utilismart billing data. It was then that we discovered a discrepancy in the data. We continued with our analysis and returned August 26<sup>th</sup>, 2013 to confirm the findings.

It has been confirmed that the billing error commenced from the time of the new meter installation (June 2006), following the installation of the new meters during an expansion at the Hospital. In March 2008, a meter data file was sent from our previous Meter Service Provider (Peterborough Utilities). The data was installed in the new Utilismart system in June 2008 and the data was imported to our Harris billing system.

The Billing multiplier is the reason for the error.

c. Has ORPC corrected the billing error for this customer? If yes,i) What actions did OPRC undertake for billing correction?ii) In which period was the billing error corrected by ORPC?

ORPC consulted the most recent update to the Distribution System Code to determine the payment method, timing, etc. ORPC met with the Almonte Hospital staff on September 5<sup>th</sup> to prepare a payment plan to resolve the overbilling issue.

We agreed to refund the full amount to the Almonte Hospital (Total \$103k) through seven (7) equal Monthly payments (approx. \$14.7k/month) terminating in March 2014.

Attached (Page 11) is a billing statement highlighting the Misc. Payment Adjustment in the amount of \$16,634.52 which includes HST adjustments.

## **2. Projected Interest**

A portion of Sheet "5. 2014 Continuity Schedule" from the Rate Generator Model is reproduced below.

		2	013		Projected Int	terest on Dec-31-	12 Balances
Account Descriptions	Account Number	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>1</sup>	Projected Interest from January 1, 2013 to April 30, 2013 on Dec 31 -12 balance adjusted for disposition during 2013 <sup>1</sup>	Total Claim
Group 1 Accounts							
LV Variance Account	1550	3,118	127,231	1,190	1,870		130,29
RSVA - Wholesale Market Service Charge	1580	(3.950)	(15,438)	9,862			(5,803
RSVA - Retail Transmission Network Charge	1584	2,890	27,423	(1,248)	403		26,570
RSVA - Retail Transmission Connection Charge	1586	4,049	133,572	6,991			142.520
RSVA - Power (excluding Global Adjustment)	1588	(13,549)	(248,763)	26,018	(3,657)		(226,402
RSVA - Global Adjustment	1589	(188)	(16,115)	33,863	(237)		17.51
Recovery of Regulatory Asset Balances Disposition and Recovery/Refund of Regulatory Balances (2008) <sup>5</sup>	1590		0	0	0		
	1595		0	0	0		(
Disposition and Recovery/Refund of Regulatory Balances (2009)5	1595		0	0	0		(
Disposition and Recovery/Refund of Regulatory Balances (2010) <sup>5</sup>	1595		0	0	0		
Disposition and Recovery/Refund of Regulatory Balances (2011) <sup>5</sup>	1595		0	0	0		(
Group 1 Sub-Total (including Account 1589 - Global Adjustment)		(7,630)	7,909	76,675	116	0	84,701
Group 1 Sub-Total (excluding Account 1589 - Global Adjustment)		(7.442)	24.024	42.813	353	0	67,19
RSVA - Global Adjustment	1589	(188)	(16,115)	33,863	(237)	0	17,511
Deferred Payments in Lieu of Taxes	1562		0	0	0		
Total of Group 1 and Account 1562		(7,630)	7,909	76,675	116	0	84,701
Special Purpose Charge Assessment Variance Account <sup>a</sup>	1521						
RAM Variance Account <sup>6</sup>	1568		0	0			
otal including Accounts 1562 and 1568		(7.630)	7.909	76.675	116	0	84.70

Board staff notes that the column pertaining to the Projected Interest from January 1, 2014 to April 30, 2014 is unpopulated.

Ottawa River Power Corporation concurs with Board staff on this matter.

## 3. Metered kWh and kW

#### Ref: Rate Generator Model

A portion of Sheet "6. Billing Det. For Def-Var" from the Rate Generator Model is reproduced below.

Rate Class	Unit	Metered kWh	Metered kW
RESIDENTIAL	\$/kWh		
GENERAL SERVICE LESS THAN 50 KW	\$/kWh		
GENERAL SERVICE 50 TO 4,999 KW	\$/kW		
SENTINEL LIGHTING	\$/kW		
STREET LIGHTING	\$/kW		
UNMETERED SCATTERED LOAD	\$/kWh		
microFIT			
	Total	0	0

#### **Threshold Test**

Total Claim (including Account 1521, 1562 and 1568) Total Claim for Threshold Test (All Group 1 Accounts) Threshold Test (Total claim per kWh) <sup>3</sup>

\$84,701 \$84,701

0.0000 Claim does not

		2	013		Projected Int	erest on Dec-31-12	2 Balances
Account Descriptions	Account Number	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 January 1, 2013 to April 30, 2013 on Dec 31 .12 balance adjusted for disposition during 2013 <sup>3</sup>	Total Claim
Group 1 Accounts							
V Variance Account	1550	3,118	127,231	1,190	1.870		130,291
RSVA - Wholesale Market Service Charge	1580	(3.950)	(15,438)	9,862			(5.803
RSVA - Retail Transmission Network Charge	1584	2,890	27,423	(1,248)	403		26,578
RSVA - Retail Transmission Connection Charge	1586	4,049	133,572	6,991	1,964		142.526
RSVA - Power (excluding Global Adjustment)	1588	(13,549)	(248,763)	26,018			(226,402
RSVA - Global Adjustment	1589	(188)	(16, 115)	33,863	(237)		17,51
Recovery of Regulatory Asset Balances	1590		0	0	0		
Disposition and Recovery/Refund of Regulatory Balances (2008) <sup>5</sup>	1595	Contraction of the	0	0	0		(
Disposition and Recovery/Refund of Regulatory Balances (2009) <sup>5</sup>	1595		0	0	0		(
Disposition and Recovery/Refund of Regulatory Balances (2010) <sup>5</sup>	1595		0	0	0		(
Disposition and Recovery/Refund of Regulatory Balances (2011)*	1595		0	0	0		C
Group 1 Sub-Total (including Account 1589 - Global Adjustment)		(7,630)	7,909	76,675	115	0	84.70
Group 1 Sub Total (excluding Account 1589 Global Adjustment)		(7.442)	24,024	42,813	353	0	67,190
RSVA - Global Adjustment	1589	(188)	(16,115)	33,863	(237)	0	17,511
Deferred Payments in Lieu of Taxes	1562		0	o	0	0	c
Total of Group 1 and Account 1562		(7,630)	7,909	76,675	116	0	84,70
Special Purpose Charge Assessment Variance Account <sup>4</sup>	1521						
RAM Variance Account <sup>6</sup>	1568	COLUMN IN	o	O			
Total Including Accounts 1562 and 1568		(7.630)	7,909	76.675	116		84.70

A portion of Sheet "3. Re-Based Bill Det & Rates" from the Revenue to Cost Ratio ("RC") Model is reproduced below.

Rate Group	Rate Class	Fixed Metric	Vol Metric	Re-based Billed Customers or Connections A	Re-based Billed kWh B	Re-based Billed kW C
RES	Residential	Customer	kWh	8,985	79,547,654	
GSLT50	General Service Less Than 50 kW	Customer	kWh	1,381	36,098,055	
GSGT50	General Service 50 to 4,999 kW	Customer	kW	144	76,345,026	211,781
Sen	Sentinel Lighting	Connection	kW	216	265,370	760
SL	Street Lighting	Connection	kW	2,653	2,414,487	6,853
USL	Unmetered Scattered Load	Customer	kWh	73	437,952	

Board staff notes that the "Metered kWh" and "Metered kW" columns in Sheet 6 of the Rate Generator Model are not populated. Board staff further notes that in order for the Rate Generator Model to calculate the Threshold Test value, the "Metered kWh" column needs to be populated. Board staff also notes that ORPC has provided the correct values for "Metered kWh" and "Metered kW" in Sheet 3 of the RC Model.

a. If the omission of the "Metered kWh" and "Metered kW" values in the Rate Generator Model is an error, Board staff will use the values from the RC Model to make the relevant correction.

Ottawa River Power Corporation concurs with Board staff on this matter that the Tables need to be populated.

#### 4. Specific Service Charge

Ref: Rate Generator Model

Ref: 1ORPC's Tariff of Rates and Charges effective May 1, 2013

A portion of Sheet "10. Other Charges & LF" from the Rate Generator Model is reproduced below.

Non-Payment of Account

Late Payment - per month	%	1.50
Late Payment - per annum	%	19.56
Disconnect/Reconnect at meter – after regular hours	S	65.00
Disconnect/Reconnect Charge – At Meter – After Hours	S	185.00

A portion of ORPC's Tariff of Rates and Charges effective May 1, 2013 is reproduced below.

NC	on-Payment of Account		
	Late Payment – per month	%	1.50
	Late Payment – per annum	%	19.56
	Collection of account charge – no disconnection	\$	30.00
	Disconnect/Reconnect at meter – during regular hours	\$	65.00
	Disconnect/Reconnect Charge – At Meter – After Hours	\$	185.00

Board staff notes that "Collection of account charge – no disconnection" is missing in the Rate Generator Model.

a. If the omission of the "Collection of account charge – no disconnection" in the Rate Generator Model is an error, Board staff will make the relevant correction.

Ottawa River Power Corporation concurs with Board staff on this matter that the Tables need to be populated with "Collection of account charge – no disconnection".

## 5. Non-Loss Adjusted Metered Billed kWh and kW

#### Ref: RTSR Model

A portion of Sheet "4. RRR Data" from the RTSR Model 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	76,993,425		1.0390		79,996,169	
General Service Less Than 50 kW	kWh	31,672,692		1.0390		32,907,927	-
General Service 50 to 4,999 kW	kW		203,575		0.00%		203,575
Sentinel Lighting	kW		735		0.00%		735
Street Lighting	kW		6,840		0.00%		6,840
Unmetered Scattered Load	kWh	446,892		1.0390		464,321	

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 WPI's Board-approved loss factor.

Ottawa River Power Corporation concurs with Board staff on this matter that the values have not been adjusted by WPI's Board approved loss factor.

#### 6. USL Rate Class - Tax Savings Model

Ref: Tax Savings Model

A portion of Sheet "3. Re-Based Bill Det & Rates" from the Tax Savings Model is reproduced below.

Last COS R	e-based Year was in 2010								
Rate Group	Rate Class	Fixed Metric	Vol Metric	Re-based Billed Customers or Connections A	Re-based Billed kWh B		Rate ReBal Base Service Charge D	Rate ReBal Base Distribution Volumetric Rate kWh E	Rate ReBal Base Distribution Volumetric Rate kW F
RES	Residential	Customer	kWh	8,895	79,547,654		10.93	0.0148	
GSLT50	General Service Less Than 50 kW	Customer	kWh	1,391	36,098,055		22.61	0.0104	
GSGT50	General Service 50 to 4,999 kW	Customer	kW	144	79,345,026	211,781	372.81		0.6387
Sen	Sentinel Lighting	Connection	kW	216	265,370	760	2.56		7.7587
SL	Street Lighting	Connection	kW	2,653	2,414,487	6,853	1.84		10.1285
USL	Rate Class 6	Connection	kWh						
			and the second						

Board staff notes that the rate class description, number of customers/connections, kWh, kW, service charge and volumetric rate is missing for the Unmetered Scattered Load ("USL") rate class in the above table. Board staff further notes for all rates classes, the service charges and volumetric rates provided in the above table are from ORPC's Tariff of Rates and Charges effective May 1, 2012 rather than May 1, 2013.

a. If the omission of the USL rate class and associated data in the Rate Generator Model is an error, Board staff will make the relevant correction.

Ottawa River Power Corporation concurs with Board staff on this matter that the omission is an error.

b. If use of the Tariff of Rates and Charges effective May 1, 2012 rather than May 1, 2013 is an error; Board staff will make the relevant correction.

Ottawa River Power Corporation concurs with Board staff on this matter that the Tariff of Rates and Charges effective May 1, 2013 should apply.

#### 7. Revenue Cost Ratios

### Ref: Revenue Cost ("RC") Ratio Model

A portion of Sheet "6. Decision Cost Revenue Adj" from the RC Model is reproduced below.

Rate Class	Direction	Current Year 2012	Transition Year 1 2013	Transition Year 2 2014	Transition Year 3 2015	Transition Year 4 2016	Transition Year 5 2017
Residential	No Change	107.00%	107.00%	107.00%	107.00%	107.00%	107.00%
General Service Less Than 50 kW	No Change	88.00%	88.00%	88.00%	88.00%	88.00%	88.00%
General Service 50 to 4,999 kW	No Change	103.00%	103.00%	103.00%	103.00%	103.00%	103.00%
Sentinel Lighting	No Change	80.00%	80.00%	80.00%	80.00%	80.00%	80.00%
Street Lighting	No Change	70.00%	70.00%	70.00%	70.00%	70.00%	70.00%
Unmetered Scattered Load	No Change	70.00%	70.00%	70.00%	70.00%	70.00%	70.00%

Board staff notes that upon comparing the current year RC ratios in the RC Model to the Board approved RC ratios in ORPC's 2013 IRM Decision (EB-2012- 0158)<sub>2</sub>, the ratios for the Sentinel Lighting and Unmetered Scattered Load rate classes have been interchanged in the RC Model.

a. If the interchanging of the RC ratios the Sentinel Lighting and Unmetered Scattered Load rate classes is an error, Board staff will make the relevant correction.

Ottawa River Power Corporation concurs with Board staff on this matter that the interchanging of the ratios is an error.

## **Ottawa River Power**

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		Service F	Period	Billing	Read	Meter Rea	dings	Mult	Usag	e	Units	Adjust.	Pwr/Load
ſ	Vieter Number	Present	Previous	Days	Туре	Present	Previous	Size	Base	Billed		Factor	Factor
Е	0000011274	2013-11-01	2013-10-01	31	A			M300	230200.70	239178.53	kWh	1.0390	L.58
$\mathbf{E}$	0000011274	2013-11-01	2013-10-01	31	A			M300	537.49	575.10	kW		P
Е	0000011274	2013-11-01	2013-10-01	31	A			M300	537.49		kW		
Е	0000011274	2013-11-01	2013-10-01	31	A			M300	639.00		kVA		
Е	0000011274	2013-11-01	2013-10-01	31	A			M300	639.00		kVA		

BILLING SUMMARY	
Previous Balance as of : 2013-10-16	\$21,705.05
Payments as of 2013-11-18	(\$21,705.05
Adjustments as of 2013-11-18	(\$16,634.52
Interest Charges as of : 2013-11-18	\$0.00
Balance Forward as of : 2013-11-18	(\$16,634.52
Current Charges as of : 2013-11-18	\$27,670.69
Total Amount Due	\$11,036.1

Weighted Average Price 0.022558

PREVIOUS BALANCE MISC. BILLING ADJUSTMENT 11 PAYMENT 10/29/2013	/04		\$21,705.05 -\$16,634.52 -\$21,705.05
BALANCE FORWARD	r.	(	-\$16,634.52
	RATE	USAGE	CHARGES
Your Electricity Charges: Standard Supply Service Global Adjustment Delivery Regulatory charges Debt Retirement Charge			5,395.39 13,901.05 2,794.90 1,339.64 966.84
<b>Other Charges:</b> HST-R871764072 INTERVAL READING FEE			3,183.35 89.52
Current Charges due by 2013	-12-04		\$27,670.69
TOTAL AMOUNT DUE			\$11,036.17

Consumption History									
Month	Days	Electric Use (kwh)	Elec. Usage per Day						
IO-13 )9-13 )8-13 )7-13 )06-13 )05-13 )05-13 )04-13 )02-13 )1-13 I2-12 I1-12 I0-12	31 30 31 30 31 30 31 31 31 31 31 30 31	230201 247685 327431 352496 292431 274214 228372 238200 220416 239893 232958 232958 232988 232958 2329860	7426 8256 10562 11371 9748 8846 7612 7684 7872 7738 7516 7512 7737						

Bill Type	Account Type	Bill Date	Due Date	Amount Due	Payment Type
REGULAR	GS INTERVAL	2013-11-18	2013-12-04	11,036.17	PLEASE PAY BY DUE DATE

Due to Poor Power Factor, Demand billed at 90% of kVA Ontario Clean Energy Benefit takes 10% off the cost of up to 3,000 kWh/month of electricity use. Some exceptions apply, please see Ontario.ca/OCEB or 1-888-668-4636. To learn more about how Ontario is building a strong, clean electricity system, vist Ontario.ca/energyplan. Learn about the new Ontario Clean Energy Benefit: ontario.ca/energyplan or 1-888-668-4636 TO VIEW YOUR TIME OF USE CONSUMPTION, PLEASE SIGN AND

REGISTER AT http://lowfoot.com/orpc