



PUBLIC INTEREST ADVOCACY CENTRE

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December 16, 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: EB-2012-0109 Brantford Power Inc.

Please find enclosed the supplemental interrogatories of VECC in the above-noted proceeding.

Yours truly,

Michael Janigan
Counsel for VECC

cc. Brantford Power Inc. - Ms. Heather Wyatt - hwyatt@brantford.ca

REQUESTOR NAME	VECC
INFORMATION REQUEST ROUND NO:	# 2 (Supplementary)
TO:	Brantford Power Inc. (Brantford or BPI)
DATE:	December 16, 2013
CASE NO:	EB-2012-0109
APPLICATION NAME	2013 Cost of Service Electricity Distribution Rate Application

NB: Numbering continues from VECC original IRs.

2. RATE BASE (Exhibit 2)

2.0-VECC – 41

Reference: 2.0-Energy Probe-13

- a) BPI explains that capital contributions are not based on specific projects, but rather on historical contributions. Yet the 2013 capital contribution amount is lower in all but 1 of the prior 5 years. Please provide the methodology for estimating the 2013 capital contributions. Please also explain why the amount does not change now that 2012 actual contributions are known.

2.0-VECC – 42

Reference: 2.0-VECC-5/2.0-SEC-2

- a) The response (Appendix 2-A) is not legible. Please provide the live Excel spreadsheet.

2.0-VECC – 43

Reference: 2.0-VECC-3

- a) Please provide the response by dollars (e.g. indicating how many \$ were spent on the capital category of “capacity”, “renewal”, etc. in 2009, 2010 etc.)

2.0 – VECC – 44

Reference: 2-VECC-7

- a) What was the cause(s) of the significant increase in defective equipment related outages in 2010?

3. LOAD FORECAST/ OPERATING REVENUE (Exhibit 3)

3.0-VECC – 45

Reference: Staff #11

Staff #13

Exhibit 3, Tab 2, Schedule 1, page 8 (Table 3.4) & page 17

(Table 3.15)

- a) Please reconcile that 5,168,137 kWh value for the impact of 2012 CDM programs in 2012 shown in OEB #11 with the 5,363,496 kWh value reported in response to Staff #13.
- b) Please provide the most recent reports available from the OPA regarding the results from 2013 CDM programs
- c) Based on the response to parts (a) and (b) please update the responses to Staff #11, Staff #13 and Tables 3.4 & 3.15 from the original application as required noting the reasons for any changes.

3.0-VECC- 46

Reference: Exhibit 3, Tab 2, Schedule 1, pages 10 (Table 3.6), 19 (Table 3.17) and 20 (Table 3.20)

- a) Based on the interrogatory responses, please provide any changes that Brantford Power considers are necessary to the above referenced tables.

3.0-VECC - 47

**Reference: Energy Probe-16
Energy Probe-17
Energy Probe-18 c)**

- a) Please update the responses for the most recent month for which actual data is available.

3.0-VECC - 48

Reference: VECC-13

- a) For the 2013 period up to the most recent month available, please provide the actual purchased kWh by month.
- b) Using the total from part (a), please provide a table that sets out:
 - 1. The 2013 actual purchased kWh to date
 - 2. The actual HDD and CDD values for the same period
 - 3. The assumed weather normal HDD and CDD values
 - 4. The difference between the Normal and Actual HDD values multiplied by 15,963 for each year
 - 5. The difference between the Normal and Actual CDD values multiplied by 110,374 for each year
 - 6. The Addition of items (1), (4) and (5) from above for each year

4. OPERATING COSTS (Exhibit 4)

4.0 - VECC-49

Reference: 4.0-VECC-20

- a) Please provide the current year-end 2013 OM&A forecast using the month ending actuals from November.
- b) When does BPI expect to complete its (unaudited) December actuals?

4-VECC- 50

Reference: 4-VECC-35

- a) Does BPI determine its tree-trimming program and if so how is this communicated – directly to the contractor or to managers of the City Affiliate?
- b) What percentage of the total tree trimming work (time and cost) is spent on City vs. BPI tree trimming activity?

COST ALLOCATION (Exhibit 7)

7.0-VECC – 51

**Reference: Energy Probe-29
VECC-36**

- a) Are the service drops owned by BPI?
- b) Who (BPI or the customer) is responsible for any maintenance/repairs required for the service drops?

7.0-VECC – 52

Reference: VECC-38

- a) Please confirm that the Board's acceptance of a 100% R/C ratio for the Embedded Distributor class in its EB-2009-0063 Decision was predicated on the fact that it was a new customer class being introduced/implemented at that time.

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