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March 20, 2014

Attention: Kirsten Walli, Board Secretary

Ontario Energy Board 2300 Yonge Street 27th Floor P.O. Box 2319 Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: Wellington North Power Inc. – ED-2002-0511

2014 Distribution Rate Application

OEB File Number: EB-2013-0178

Draft Rate Order

Wellington North Power Inc. acknowledges receipt of the Ontario Energy Board's Decision and Order dated March 13, 2014 for file number EB-2013-0178 for approval for changes to the rates that the Applicant charges for electricity distribution, effective May 1, 2014.

As per the Decision and Order, Wellington North Power Inc. submits its Draft Rate Order for Distribution Rates effective May 1, 2014. This Draft Rate Order comprises of the following components:

- 1. Draft Rate Order Summary including:
 - 1.1 Price Cap Index Adjustment;
 - 1.2 Rural or Remote Electricity Rate Protection Charge;
 - 1.3 Retail Transmission Service Rates;
 - 1.4 Disposition of Group 1 Deferral and variance Account Balances;
 - 1.5 Incremental Capital Module (ICM):
 - 1.5.1 Threshold Parameters;
 - 1.5.2 Threshold CapEx;
 - 1.5.3 Eligible Incremental Capital calculation;
 - 1.5.4 ICM Rate Riders; and
 - 1.6 Bill Impact analysis.
 - 1.7 Draft Tariff of Rates and Charges
- 2. Excel versions of:
 - 2014 IRM Revenue-Cost Ratio Adjustment Workform;

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- 2014 IRM Tax Sharing Model v1.1;
- 2014 RTSR Model v4.0 with 2014 approved charges;
- 2014 ICM Workform with updated GDP-IPI;

- 2014 Rate Generator Workform with updated GDP-IPI; and
- 2014 Draft Tariff of Rates and Charges.

An electronic copy of this Submission response has been filed on the RESS site and two hard copies have been sent by courier to the Board's office for the attention of the Board Secretary.

Should the Board have questions regarding this matter please contact myself at rbucknall@wellingtonnorthpower.com or call 519-323-1710.

Yours truly.

Richard Bucknall

Regulatory Compliance and Office Manager

cc: Board Secretary

cc: Stephen Vetsis - OEB Analyst, Applications & Regulatory Audit (by e-mail)

cc: Intervenors on Record (by e-mail)

cc: Mr. Randy Aiken, Consultant to Energy Probe (by e-mail)

cc: Ms. Shelley Grice, Consultant to VECC (by e-mail)

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Wellington North Power Inc. ("WNP") 2014 IRM Rate Application Draft Rate Order EB-2013-0178

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1. Draft Rate Order Summary

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The purpose of this Draft Rate Order is to provide the Board with information and calculations showing the impact of the Decision and Order on Wellington North Power Inc.'s determination of final rates, effective May 1, 2014.

The Decision and Order that was issued on March 13, 2014 consisted of the following items:

- Price Cap Index Adjustment;
- Rural or Remote Electricity Rate Protection Charge;

Continues and

- Retail Transmission Service Rates;
- Disposition of Group 1 Deferral and Variance Account Balances; and
- Incremental Capital Module (ICM):

These items are discussed below:

1.1 Price Cap Index Adjustment;

The Board issued the Report on Rate Setting Parameters and Benchmarking under the Renewed Regulatory Framework for Electricity Distributors (the "Price Cap IR Report") that provides the 2014 rate adjustment parameters for distribution companies selecting either the Price Cap IR or Annual IR Index option.

The rate-setting parameters, as issued by the OEB on November 21, 2013 in "EB-2010-0379 – Report of the Board: Rate Setting Parameters and Benchmarking under the Renewed Regulatory Framework for Ontario's Electricity Distributors", that apply for Wellington North Power Inc. for 2014 distribution rates are:

- Price escalator of 1.7%;
- Productivity factor of 0.00%;

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Stretch factor of 0.45% (WNP is in Cohort Group IV); and

Price Cap Index (GDP – IPI) of 1.25% (i.e. 1.70% - (0% + 0.45%)).

WNP has adjusted the IRM models used in its 2014 IRM application to apply the GDP-IPI

variables stated above. These models include:

• The Incremental Capital Module (ICM) Workform (worksheet E1.1 Threshold

Parameters); and

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The Rate Generator (worksheet 9. Rev2Cost_GDPIPI).

Updated versions of these models have been filed with this Draft Rate Order.

Submitted Files:

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WellingtonNorth_ICM-Wrkfrm_GDPIPI_EB-2013-0178_2014_DRO

WellingtonNorth_Rate Gen_GDPIPI_EB-2013-0178_2014_DRO

1.2 Rural or Remote Electricity Rate Protection Charge

The Board issued a Decision and Rate Order (EB-2013-0396) establishing the Rural or Remote Electricity Rate Protection ("RRRP") benefit and charge for 2014. The Board determined that the RRRP charge to be paid by all rate-regulated distributors and collected by the Independent Electricity System Operator shall be increased to \$0.0013

per kWh effective May 1, 2014.

As directed in the Board's Decision and Order for EB-2013-0178 (dated March 13, 2014) WNP has filed a draft Tariff of Rates and Charges schedule (see item 1.7 below) that reflects the RRRP charge of \$0.0013 per kWh effective May 1, 2014. The Rate Generator workform that has been filed with this Draft Rate Order has also been updated to reflect this amended rate.

Submitted Files:

WellingtonNorth__EB-2013-0178_Draft_Tariff_of_Rates_Charges_DRO

WellingtonNorth Rate Gen GDPIPI EB-2013-0178 2014_DRO

1.3 Retail Transmission Service Rates;

The Board approved new rates for Hydro One's Sub-Transmission class, including the applicable Retail Transmission Service Rates ("RTSRs"), effective January 1, 2014 (EB-2013-0141), as shown in the following table:

2014 Sub-Transmission RTSRs			
Network Service Rate	\$3.23 per kW		
Connection Service Rates:			
Line Connection Service Rate	\$0.65 per kW		
Transformation Connection Service rate	\$1.62 per kW		

The approved 2014 Retail Transmission Service Rates have been included in the updated RTSR model that has been filed with this Draft Rate Order. The table below illustrates the 2014 RTSRs that have been applied in the RTSR model (worksheet: "5. UTR and Sub-Transmission"):

Hydro One Sub-Transmission Rates Unit		Effective	Effective January 1,		Effective January 1.		Effective January 1	
nyuto One Suu-Hansinission kates	Unit		2012	Ŋ	2013	1	2014	
Rate Description		1	Rate	J	Rate	1	Rate	
Network Service Rate	kW	\$	2.65	\$	3.18	\$	3.23	
Line Connection Service Rate	kW	S	0.64	5	0.70	\$	0.65	
Transformation Connection Service Rate	kW	s	1.50	\$	1.63	\$	1.62	
Both Line and Transformation Connection Service Rate	kW	\$	2.14	5	2.33	5	2.27	

RTSR Workform; worksheet: "5. UTR and Sub-Transmission"

The table below shows (i) RTSR Network and RTSR Connection rates that were filed in WNP's Application and (ii) the revised calculated rates that are being filed as part of the Draft Rate Order. The reason for the change is as a result of applying the 2014 approved Hydro One Sub-Transmission rates in the RTSR model:

		Final Submission		Draft Ra	te Order
		Proposed RTSR	Proposed RTSR	Proposed RTSR	Proposed RTSR
Rate Class	Unit	Network	Connection	Network	Connection
Residential	kWh	\$0.0065	\$0.0041	\$0.0066	\$0.0041
General Service Less Than 50 kW	kWh	\$0.0060	\$0.0035	\$0.0061	\$0.0034
General Service 50 to 999 kW	kW	\$2.4756	\$1.3947	\$2.5128	\$1.3720
General Service 1,000 to 4,999 kW	kW	\$2.6295	\$1.5289	\$2.6690	\$1.5041
Unmetered Scattered Load	kWh	\$0.0060	\$0.0035	\$0.0061	\$0.0034
Sentinel Lighting	kW	\$1.8764	\$1.1007	\$1.9046	\$1.0829
Street Lighting	kW	\$1.8670	\$1.0783	\$1.8950	\$1.0608

RTSR Workform; worksheet: "13. Final 2014 RTS Rates"

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Updated versions of the RTSR model have been filed with this Draft Rate Order.

Submitted File: WellingtonNorth_EB-2013-0178_2014_RTSR MODEL_V4.0_DRO

1.4 Disposition of Group 1 Deferral and variance Account Balances;

As per Decision and Order dated March 13, 2014, the Board approves the disposition of a credit balance of \$253,967 as of December 31, 2012, including interest as of April 31, 2014 for Group 1 accounts.

The table below summarises the Principal and Interest amounts approved for disposition for Group 1 Accounts as per WNP's IRM application and the Board Decision and Order:

Account Name	Account Number	Principal Balance	Interest Balance	Total Claim
		Α	В	C = A + B
LV Variance Account	1550	(\$40,216)	(\$1,018)	(\$41,234)
RSVA - Wholesale Market Service Charge	1580	(\$251,680)	(\$9,082)	(\$260,762)
RSVA - Retail Transmission Network Charge	1584	\$12,058	\$110	\$12,168
RSVA - Retail Transmission Connection Charge	1586	(\$60,203)	(\$5,753)	(\$65,956)
RSVA - Power	1588	\$358,726	\$16,903	\$375,629
RSVA - Global Adjustment	1589	(\$264,863)	(\$9,146)	(\$274,009)
Disposition and Recovery/Refund of Regulatory Balances (2008)	1595	\$4,772	(\$4,575)	\$197
Total Group 1 Excluding Global Adjustment – Account 158	9	\$23,457	(\$3,414)	\$20,042
Total Group:	1	(\$241,406)	(\$12,561)	(\$253,967)

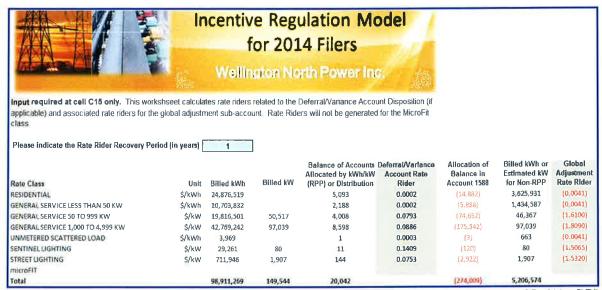
As per Decision and Order, Wellington North Power Inc. understands that:

- a) The balance of each Group 1 account approved for disposition shall be transferred to the applicable principal and interest carrying charge sub-accounts of Account 1595 pursuant to the requirements specified in Article 220, Account Descriptions, of the Accounting Procedures Handbook for Electricity Distributors.
- b) The date of the transfer must be the same as the effective date for the associated rates in this application this date will be May 1, 2014; and
- c) The LDC needs to ensure these adjustments are included in the RRR reporting period ending June 30, 2014 (Quarter 2).

As per Decision and Order, Wellington North Power Inc. accepts that these balances are to be disposed over a one-year (1 year) period from May 1, 2014 to April 30, 2015. The

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table below summarises the Deferral / Variance Account Rate Rider and Global Adjustment Rate Rider by rate class with a disposition period of one-year (1 year):



Rate Generator Workform; worksheet: "8. Calculation of Def-Var RR"

The Rate Riders illustrated in the above table have been included in the draft Tariff of Rates and Charges schedule (see item 1.7 below).

Submitted Files: WellingtonNorth Rate Gen GDPIPI EB-2013-0178_2014_DRO

1.5 Incremental Capital Module (ICM):

As per Board Findings in the Decision and Order, the Board agrees and has determined that the project is non-discretionary and eligible for ICM funding, due to the identified safety and reliability issues mentioned in the application.

As directed in the Decision and Order, below are the relevant calculations relating to the Incremental Capital Module:

1.5.1 Threshold Parameters;

The table below, taken from the ICM Workform worksheet "E1.1 Threshold Parameters", illustrates the variables and values applied to calculate the Price Cap Index. The values align to the Price Cap Index Adjustment that was discussed above in Section 1.1.Price Cap Index Adjustment.

Incremental Capital Wor for 2014 Filers	rkform		
Threshold Parameters			
Price Cap Index			
Price Escalator (GDP-IPI)	1.70%		
Less Productivity Factor	0.00%		
Less Stretch Factor	-0.45%		
Price Cap Index		1.25%	
Growth			
ICM Billing Determinants for Growth - Numerator: 2012 Re-based Foreca	ast	\$2,214,739	_ A
ICM Billing Determinants for Growth - Denominator : 2011 Actual		\$2,189,648	В
Growth		1.15%	C = A / E

The above table also shows the growth variable of 1.15% that has been applied in the Incremental Capital Workform that has been filed with this Draft Rate Order.

1.5.2 Threshold CapEx;

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The table below shows the Threshold Test which is part of the Incremental Capital Workform. The highlighted cells in this table illustrate the differences between the Final Submission information that was filed by the Applicant on January 17, 2014 versus the revised data that has been filed as part of the Draft Rate Order:

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Threshold Test	Final Submission	Draft Rate Order	Calculation	Changed	Variance
Year	2012	2012			20
Dd C I-d	0.4044	1		Yes	0.82%
Price Cap Index	0.43%	1.25%	A B	No	0.64%
Growth	1.15%	1.15%	C		
Dead Band	20.00%	20.00%		No	
Average Net Fixed Assets	612 142 662	040 440 660			
Gross Fixed Assets Opening	\$12,143,669 \$0	\$12,143,669 \$0			
Add: CWIP Opening	\$760,000	T-12-12-12-12-12-12-12-12-12-12-12-12-12-			
Capital Additions	and the second second second	\$760,000			
Capital Disposals	(\$510,744)	(\$510,744)			
Capital Retirements	\$0	\$0			
Deduct: CWIP Closing	\$0	\$0			
Gross Fixed Assets - Closing	\$12,392,925	\$12,392,925			
Augusta Casas Fixed Assets	010 000 001	010.050.007		No	
Average Gross Fixed Assets	\$12,268,297	\$12,268,297		NO	
Accumulated Depreciation - Opening	\$6,366,338	\$6,366,338			
Depreciation Expense	\$387,630	\$387,630	D		
Disposals	(\$309,511)	(\$309,511)			
Retirements	\$0	\$0			
Accumulated Depreciation - Closing	\$6,444,457	\$6,444,457			
Average Accumulated Depreciation	\$6,405,398	\$6,405,398		No	
Average Net Fixed Assets	\$5,862,899	\$5,862,899	E	No	
Working Capital Allowance					
Working Capital Allowance Base	\$11,617,281	\$11,617,281			
Working Capital Allowance Rate	14%	14%			
Working Capital Allowance	\$1,626,419	\$1,626,419	F	No	
Rate Base	\$7,489,318	\$7,489,318	G = E + F	No	
Depreciation D	\$387,630	\$387,630	Н	No	
Threshold Test	150.54%	166.57%	I = 1 + (G / H) * (B + A * (1 + B)) + C	Yes	16.029
Threshold CAPEX	\$583,551	\$645,667	J = H *I	Yes	\$62,11

The amendments to the data shown under the Draft Rate Order column (cells highlighted) in the above table are due to:

 Price Cap Index – the Incremental Capital Module Workform has been updated to reflect the rate-setting parameters, as issued by the OEB on November 21, 2013 in "EB-2010-0379 – Report of the Board: Rate Setting Parameters and Benchmarking

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under the Renewed Regulatory Framework for Ontario's Electricity Distributors". This was discussed above (section 1.1.).

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• Threshold Test – this has increased to 166.5% as a result of applying the updated rate-setting parameters to the calculation.

In its application, WNP applied the following values:

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**	Price Escalator (GDP-IPI)	1.60%	- Board approved rate is 1.70%;
*	Productivity Factor	-0.72%	- Board approved rate is 0.00%;
**	Stretch Factor	-0.40%	- Board approved rate is -0.45%
*	Price Cap Index	0.43%	- Board approved rate is 1.255%

• Threshold CapEx – as a consequence of using the approved rate-setting parameters that were issued after WNP's IRM application was submitted, applying the Price Cap Index at 1.25% and a growth variable of 1.15%, the Threshold CapEx amount is \$645,667.

The table on the following page also shows the variances between:

- WNP's ICM data that was submitted with the IR responses on November 27, 2013;
- WNP's calculations applying the approved Board Rate-Setting Parameters (21-Nov-2013) and referenced in WNP's Final Response to Energy Probe (page 10), filed on January 17, 2014; and
- Calculations as per Incremental Capital Workform filed with Draft Rate Order.

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Change Summary of ICM Data during IRM Application:

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	Incremental Capital Workform submitted with IR#1 Responses	Calculations applying Board Rate Setting Parameters (21-Nov-2013) and WNP's Final Response to Energy Probe (page 10)	Calculations as per Incremental Capital Workform filed with Draft Rate Order
Price Escalator (GDP-IPI)	1.60%	1.70%	1.70%
Less: Productivity Factor	-0.72%	0%	0%
Less: Stretch Factor	-0.45%	-0.45%	-0.45%
Price Cap Index	0.43%	1.25%	1.25%
Growth Ratebase Depreciation DeadBand	1.15% \$7,489,318 \$387,630 20%	1.15% \$7,489,318 \$387,630 20%	1.15% \$7,489,318 \$387,630 20%
Threshold Test	150.54%	166.65%	166.57%
Threshold CapEx	\$583,551	\$645,976	\$645,667
2014 Non-Discretionary Capital Budget	\$1,996,000	\$1,996,000	\$1,996,000
Eligible Incremental Capital Amount	\$1,412,449	\$1,350,024	\$1,350,333
Total Incremental Capital Amount for ICM Rate Rider Calculation	\$1,356,100		
Difference between Incremental Capital Workform submitted i	n IR#1 Responses	(\$6,076)	
Difference between Incremental Capital Workform submitted in Fir	nal Response to Eng	ergy Probe - page 10	\$309

The amendments to the data shown under the Draft Rate Order column (cells highlighted) in the above table are due to:

- Applying the approved rate-setting parameters as issued by the OEB on November 21, 2013 in "EB-2010-0379 - Report of the Board: Rate Setting Parameters and Benchmarking under the Renewed Regulatory Framework for Ontario's Electricity Distributors"; and
- Modelling rounding / calculations in the ICM model updated with the Price Cap
 Index of 1.25% filed with the Draft Rate Order which has created a variance of

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\$309 compared to WNP's spreadsheet calculations that were used in the Applicants Final Response to Energy Probe's Submission (page 10).

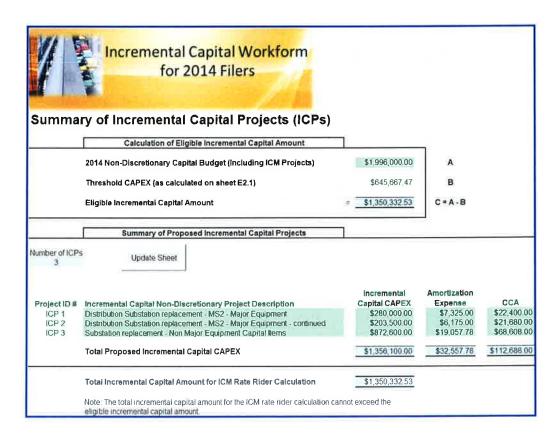
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1.5.3 Eligible Incremental Capital calculation;

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The table below, taken from the ICM Workform worksheet "E3.1 Summary of I C Projects", illustrates the Eligible Incremental Capital Amount:



The above table shows that:

- Total Proposed Incremental Capital CapEx (i.e. the total Incremental Capital CapEx required by the Applicant to replace MS-2 substation) is \$1,356,100.00.
- However, the Eligible Incremental Capital Amount that is allowed is \$1,350,332.53. The Eligible Incremental Capital Amount is calculated by:

Eligible Incremental Capital Amount	\$1,350,332.53	C = A - B	
(as described in section 1.5.2 above)			
Threshold CapEx	\$645,667.47	В	
the ICM to replace MS2 substation project)	\$1,996,000.00	Α	
2014 Non-Discretionary Capital Budget (including		Δ	

The Total Incremental Capital Amount for the ICM Rate Rider calculation <u>cannot</u> exceed the Eligible Incremental Capital Amount. The ICM rate Riders have been calculated using the Eligible Incremental Capital Amount of \$1,350,332.53 as shown in the table above.

1.5.4 ICM Rate Riders

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As per the Decision and Order, the Board accepts WNP's proposal to recover the resulting ICM revenue requirement through fixed and variable rate riders to be in effect until the issuance of the rate order arising from the Applicants next cost of service application. The table below illustrate the Rate Riders derived from the Incremental Capital Module Workform:

Calculation of Incremental Capital Rate Class	Rate Rider - (Fixed Metric	Option A Fixed Service Charge Rate Rider	Distribution Volumetric Rate kWh Rate Rider	Distribution Volumetric Rate kW Rate Rider
Residential	Customer	\$0.8809	\$0.0009	
General Service Less Than 50 kW	Customer	\$1.8702	\$0.0008	
General Service 50 to 999 kW	Customer	\$13.1477	\$0.0000	\$0.1746
General Service 1,000 to 4,999 kW	Customer	\$107.4590	\$0.0000	\$0.0902
Unmetered Scattered Load	Connection	\$0.8619	\$0.0007	
Sentinel Lighting	Connection	\$0.2499	\$0.0000	\$0.9234
Street Lighting	Connection	\$0.3392	\$0.0000	\$0.3778

An updated version of the Incremental Capital Module Workform has been filed with this Draft Rate Order.

Submitted File: WellingtonNorth_ICM-Wrkfrm_GDPIPI_EB-2013-0178_2014_DRO

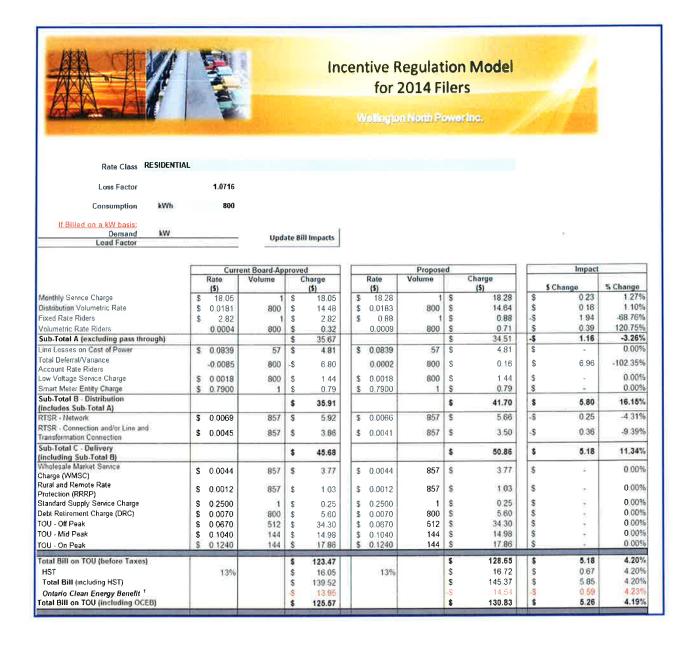
1.6 Bill Impact Analysis

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Bill Impact: Residential Customer - 800 kWh:

The Rates and Charges in the table below are based upon the output from the Rate Generator Workform that has been filed with this Draft Rate Order (*worksheet 14 "Bill Impacts"*) and refers to a Residential customer with a typical monthly consumption of 800 kWh:

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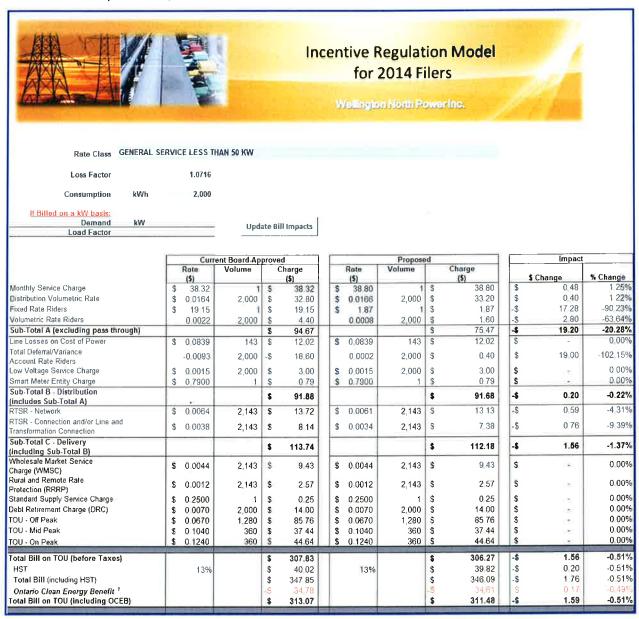
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Bill Impact: General Service <50kW Customer - 2000 kWh:

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The Rates and Charges in the table below are based upon the output from the Rate Generator Workform that has been filed with this Draft Rate Order (worksheet 14 "Bill Impacts") and refers to a General Service <50kW customer with a typical monthly consumption of 2,000 kWh:



An updated version of the Rate Generator Workform has been filed with this Draft Rate Order.

Submitted File: WellingtonNorth Rate Gen GDPIPI EB-2013-0178_2014_DRO

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1.7 Draft Tariff of Rates and Charges

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An updated version of the Rate Generator Workform has been filed with this Draft Rate Order. This workform includes the proposed Tariff of Rates and Charges (worksheet "13. Final Tariff Schedule")

Submitted Files: WellingtonNorth_Rate Gen_GDPIPI_EB-2013-0178_2014_DRO

WellingtonNorth_EB-2013-0178_Draft_Tariff_of_Rates_Charges_DRO

1.8 Models filed with Draft rate Order;

The following models and filenames have been submitted as part of the Draft Rate Order:

Incremental Capital Project:

Filenames:

- WellingtonNorth_EB-2013-0178_2014_Inc_Cap_project_V1.0_A_IR1
- WellingtonNorth_EB-2013-0178_2014_Inc_Cap_project_V1.0_B_IR1
- WellingtonNorth_EB-2013-0178_2014_Inc_Cap_project_V1.0_C_IR1

Incremental Capital Workform:

Filename:

• WellingtonNorth_ICM-Wrkfrm_GDPIPI_EB-2013-0178_2014_DRO

Tax Sharing Model

Filename:

WellingtonNorth_EB-2013-0178_2014_IRM_Tax_Sharing_Model_V1.1_DRO

Revenue Cost Ratio Model

Filename:

WellingtonNorth_EB-2013-0178_2014_IRM_Revenue_Cost_Ratio_Adjustment_Wrkfrom_V2.0_DRO

RTSR model

Filename:

WellingtonNorth_EB-2013-0178_2014_RTSR MODELI_V4.0_DRO

Rate Generator Model

Filename:

WellingtonNorth_Rate Gen_GDPIPI_EB-2013-0178_2014_DRO

Draft Tariff of Rates and Charges:

Filename:

WellingtonNorth EB-2013-0178 Draft Tariff of Rates_Charges_DRO