



**PUBLIC INTEREST ADVOCACY CENTRE**  
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July 14, 2014

**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)**  
**VECC Interrogatories EB-2014-0162**  
**Milton Hydro Distribution 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.

Thank you.

Yours truly,

Michael Janigan  
Counsel for VECC

cc: Milton Hydro Distribution Inc.  
Cameron McKenzie

**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  
Milton Hydro Distribution Inc. pursuant to section 78 of the Ontario Energy Board Act  
for an order or orders approving the recovery of ice storm related restoration costs  
beginning November 1, 2014.

**Information Requests of the Vulnerable Energy Consumers Coalition (VECC)**

VECC Question #1

**Ref: Application, Page 2**

Preamble: Milton Hydro is applying for recovery of a total Z-Factor claim of \$946,967.

- a) Please confirm the costs included in the Z-Factor amount are incremental costs and that that all regular payroll costs and the associated truck costs were deducted from the total cost claim.
- b) Please provide the regular payroll costs and associated truck costs not included in the total claim.
- c) Please identify the annual storm damage costs included in current base rates.

VECC Question #2

**Ref: Application, Page 2**

Preamble: Milton Hydro indicates its capital costs related to the replacement of poles, transformers and reclosers amounted to \$48,871.

- a) Please provide an itemized breakdown of this amount.

VECC Question #3

**Ref: Application, Pages 3-4**

Preamble: Milton Hydro indicates that it had approximately 15,000 customers almost 50% of its customer base without power due to damage to its system.

- a) Please provide a complete description of Milton Hydro's damaged distribution infrastructure.

VECC Question #4

**Ref: Application, Page 8**

Preamble: Milton Hydro indicates it follows a written tree trimming policy and hires a contractor arborist to perform tree trimming in accordance with its policy.

- a) Please provide the frequency of Milton Hydro's tree trimming schedule for the past 5 years.

VECC Question #5

**Ref: Application, Page 13, Table 3**

Preamble: Table 3 includes 208 overtime hours for trucks in the amount of \$14,912.

- a) Please provide the calculation for this amount and identify any premium applied.

VECC Question #6

**Ref: Application, Page 13, Table 3**

Preamble: Table 3 provides by department overtime hours and costs. Milton Hydro has excluded the hours and costs in the amount of \$23,630 charged to capital as discussed in paragraph 1.5 above. Paragraph 1.5 on page 2 references \$48,871 in capital.

- a) Please reconcile the two capital cost amounts provided.

VECC Question #7

**Ref: Application, Page 14, Table 4**

Preamble: Table 5 provides the total distribution companies & contractors invoiced costs.

- a) Please provide a breakdown of the costs for labour, material, equipment and other costs and a provide an explanation of other costs.

VECC Question #8

**Ref: Application, Page 15, Table 5**

Preamble: Table 5 provides a listing of material capitalized in the amount of \$25,241.

- a) Please explain how this amount is treated in the recovery sought in this application and compare to the amounts referenced in VECC Question #6 above.

VECC Question #9

**Ref: Application, Pages 15-16**

Preamble: Tables 5 and 6 provide a summary of material costs.

- a) Please confirm the materials acquired were at normal rates from regular suppliers.
- b) If not, please provide an explanation and breakdown of the premium paid.

VECC Question #10

**Ref: Application, Page 17 Table 7**

Preamble: Table 7 reflects meal allowances and mileage.

- a) Please provide Milton Hydro's meal allowance and mileage policies for Milton Hydro's staff and distributors & contractors and confirm that these policies were followed.