

**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 Halton Hills  
Hydro Inc. for an Order or Orders approving the recovery of  
amounts related to the restoration of electricity service in the  
Town of Halton Hills due to the December 2013 Southern and  
Eastern Ontario Ice Storm.

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**INTERROGATORIES OF  
ENERGY PROBE RESEARCH FOUNDATION  
("ENERGY PROBE")**

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**August 7, 2014**

**HALTON HILLS HYDRO INC.  
2014 Z-FACTOR APPLICATION  
EB-2014-0211**

**ENERGY PROBE RESEARCH FOUNDATION  
INTERROGATORIES**

**Energy Probe - 1**

**Ref: Paragraph 3.6**

**Please provide a copy of HHHI's Emergency Preparedness Plan.**

**Energy Probe - 2**

**Ref: Paragraph 3.8**

- a) Did HHHI experience any other events that would have qualified for Z-factor status in 2013 but were less than the materiality threshold? If yes, please provide an estimate of the cost of these other events in 2013.**
- b) Please provide the level of costs incurred in 2013 for emergency restorations excluding the costs associated with this application.**

**Energy Probe - 3**

**Ref: Paragraph 3.8**

**The evidence states that the costs incurred as a result of this event were clearly outside of the base upon which HHHI's rates were derived based on the OEB approved 2012 cost of service proceeding.**

- a) What level of costs was included in the approved 2012 cost of service OM&A related to emergency maintenance/restorations?**
- b) What was the actual level of emergency maintenance/restoration costs incurred by HHHI in each of 2008 through 2012?**

#### **Energy Probe - 4**

**Ref: Paragraphs 4.1-4.4**

- a) Were there any material costs incurred related to the ice storm? If yes, are these costs included in or in addition to the costs shown in Table 3?**
- b) If there were material costs incurred, is HHHI proposing to recover those costs in the Z factor application? Please explain.**
- c) Are any of the costs shown in Table 3 eligible to be capitalized?**

#### **Energy Probe - 5**

**Ref: Paragraph 1.5 & Appendix C**

- a) Please define what HHHI means by "commercially reasonable terms".**
- b) Has HHHI attempted to obtain funding to offset the costs claimed from other sources, including but not limited to the Ontario Disaster Relief Assistance Program? If not, why not?**

#### **Energy Probe - 6**

**Ref: Paragraphs 5.1-5.3 & Table 5**

**HHHI is proposing to use the customer count/connections as of the end of 2013 to calculate the rate rider.**

- a) How many customers/connections does HHHI forecast that it will have at the end of October, 2014?**
- b) How many metered customers does HHHI forecast that it will have at the end of October, 2016?**
- c) Based on the most recent month available on an actual basis, how many customers/connections does HHHI have?**
- d) If the rate rider is calculated based on the December 31, 2013 number of customers, does HHHI agree that it is likely to recover in excess of the amount through the rate rider because the number of customers/connections will be higher than the number used to calculate the rate rider?**

- e) Will any over collection resulting from the increase in the number of metered customers be held in the Z-factor account and refunded to ratepayers after the rate rider expires at the end of October, 2016? If not, why not?
- f) Would HHHI agree to track the revenues received from the rate rider and to refund any over collection to ratepayers following a review in a subsequent proceeding? If not, why not?

#### **Energy Probe - 7**

**Ref: Table 5**

- a) Please explain why HHHI is allocating costs among the rate classes in the 2012 service revenue requirement rather than by kWh figures for 2012.
- b) If the storm costs had been allocated on the same basis as tree trimming costs, how would these costs be allocated to the rate classes? Please base the response on the cost allocation methodology used and approved by the Board in the last cost of service application.
- c) If the storm costs had been allocated on the same basis as maintenance of poles, towers and fixtures or maintenance of overhead conductors and devices, how would these costs be allocated to the rate classes? Please base the response on the cost allocation methodology used and approved by the Board in the last cost of service application.
- d) Please provide a version of Table 5 that shows the allocation of the amount requested to be recovered to each rate class based on HHHI's proposal and each of the possible alternatives from parts (a), (b) and (c) above.

#### **Energy Probe - 8**

**Ref: Section 2**

- a) Please provide a copy of HHHI's tree trimming policy.
- b) When was this tree trimming policy implemented and/or changed?
- c) What was the forecast of tree trimming costs for 2012 in EB-2011-0271?
- d) Please provide the actual tree trimming costs incurred in each of 2011, 2012 and 2013.