



**PUBLIC INTEREST ADVOCACY CENTRE**  
**LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC**

**ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7**

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: [piac@piac.ca](mailto:piac@piac.ca). <http://www.piac.ca>

Michael Janigan  
Counsel for VECC  
(613) 562-4002 ext 26

August 11, 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-2014-0211**  
**Halton Hills Hydro 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: Halton Hills Hydro Inc.

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF**

the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B);

**AND IN THE MATTER OF** an Application by

Halton Hills Hydro Inc., for an order, 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 Ice Storm, to be effective November 1, 2014, for 24 months.

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

VECC Question #1

**Ref: Z-Factor Application**

Preamble: Halton Hills is applying for recovery of a total Z-Factor claim of \$1,561,372.

- 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/vehicle costs were deducted from the total cost claim.
- b) Please identify the annual storm damage costs included in current base rates.
- c) Page 4 – How many customers had damage or continued tree contact to customer owned private equipment and lines as of December 29, 2013.
- d) Page 4 – Please provide a summary of the invoiced costs for each of the 11 LDCs, 3 contractors and 5 tree contractors.
- e) Page 10 Table 3 - Please breakdown the “Other External Costs” separately between Halton Hills, Line contractors, Tree contractors and utilities.
- f) Page 10 Table 3 – Please provide a breakdown of the \$15,253.13 in communication costs.
- g) Page 10 Table 3 – Please provide the cost of materials and confirm the materials acquired were at normal rates from regular suppliers. If not, please provide an explanation and breakdown of the premium paid.
- h) Page 10 Table 3 – Please provide a breakdown of overtime of \$245,341.20 by overtime hours by department and management and any other relevant categories.

- i) Please provide a description of Halton Hydro's meal allowance and mileage policies for Halton Hill's staff and distributors & contractors and confirm that these policies were followed.
- j) How are overtime hours for vehicles treated in this application?

#### VECC Question #2

#### **Ref: Z-Factor Application, Appendix C, Presentation by President and CEO**

- a) Please provide the date of the presentation.
- b) Slide - Impact of Storm: Please discuss the reasons why 100% of Halton Hill's customers were without power compared to neighbouring utilities with a much lower % of customers out.
- c) Slide - Impact of Storm: 3 properties with extensive private property damage on unused properties will be addressed in spring. Please explain how this work impacts this application.
- d) Slide – Customer Reaction: Please explain the nature of the 3 insurance claims, the status and what resulting costs are included in this application.
- e) Slide – Halton Hills Hydro Staff involved in Storm Response: Please add two columns, # of staff and cost, to the table.
- f) Slide – Cleanup: Please confirm if any of the cleanup costs listed are included in the application for recovery.
- g) Slide – Damage to our system: Please provide a complete description and breakdown of the total cost of Halton Hill's damaged distribution infrastructure and explain how these costs are accounted for in the application.
- h) Slide – Tree Trimming – Halton Hills entire system is trimmed under emergency conditions. Please provide the rationale.
- i) Slide – Cost Recovery Options – Please explain why option 1 – Partner with Town for Ontario Disaster Relief Assistance Program funding was not the recommended option. How much funding would be available to Halton Hills under this program?