



PUBLIC INTEREST ADVOCACY CENTRE

LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

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August 15, 2014

VIA 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-2014-0002 Horizon Utilities Corporation
Interrogatories of the Vulnerable Energy Consumers Coalition
(VECC)**

Please find attached VECC's interrogatories to the City of Hamilton in respect of the WattsWorth Analysis evidence filed on their behalf by WeirFoulds LLP in the above proceeding.

Thank you.

Yours truly,

A handwritten signature in black ink, appearing to be 'Michael Janigan', written in a cursive style.

Michael Janigan
Counsel for VECC

cc: City of Hamilton - Gord McGuire - gord.mcquire@hamilton.ca
WeirFoulds LLP - Robert Warren - rwarren@weirfoulds.com

**HORIZON UTILITIES CORPORATION
2015-2019 RATE APPLICATION
EB-2014-0002**

VECC INTERROGATORIES RE:

CITY OF HAMILTON EVIDENCE BY WATTSWORTH ANALYSIS

CoH – VECC - 93

Reference: WattsWorth Evidence, Figure 4

- a) Please confirm that the growth in revenue requirement will be influenced not only by increases in the cost of providing a “unit of service” but also by the annual change in the number of units of service provided (e.g. # of customers served, # of kWh delivered, kW of peak load served).
- b) Please confirm that the “Revenue Requirement following OEB Published Inflation” line in the Figure does not account for year over year changes in the “units of service” provided.

CoH – VECC - 94

Reference: WattsWorth Evidence, Figure 5 and Figure 13

- a) Please explain why it is relevant to compare percentage revenue requirement attributable to a particular customer class with its percentage of total kWh.
- b) Why is this more appropriate than comparing percentage of revenue requirement to a particular customer class’ percentage of system peak load or percentage of total service connections’

CoH – VECC - 95

Reference: WattsWorth Evidence, Section 3-I

- a) Does WattsWorth have any information to suggest that Horizon’s device to connection ratio is other than the 1.3141:1 value used by the utility in its Application? If so, please provide.

CoH – VECC - 96

Reference: WattsWorth Evidence, Section 3-III

- a) In WattsWorth's view, is it appropriate for Horizon to create two separate Large Use customer classes?
- b) If so, have the costs been appropriately allocated to each and what changes, if any, would Wattsworth suggest should be made to the Cost Allocation?

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