

August 15, 2014

VIA EMAIL TO: boardsec@ontarioenergyboard.ca
AND
PUROLATOR COURIER

ONTARIO ENERGY BOARD
P.O. Box 2319
2300 Young Street, 27th Floor
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FILE NO. EB-2014-0055

Attention: Ms. K. Walli
Board Secretary

Dear Ms. Walli:

RE: **Algoma Power Inc. Cost of Service Application**
Written Questions of Algoma Power Coalition to Algoma
Power Inc. for Technical Conference
Our File No. 12524-7

Please accept this document as Algoma Coalition's written questions for the Technical Conference scheduled for August 20 and 21, 2014 with respect to the above-noted matter.

Pursuant to the Board's Rules and Regulations, two hard copies of the said Interrogatories will follow under separate cover by Purolator Courier.

Algoma Coalition Questions for Technical Conference

1. Interrogatory #1

The answer to Algoma Coalition's first interrogatory is not responsive – Algoma Coalition requires the following information:

- a. It appears DFP is treated like a customer and not an embedded distributor. API applies the RRRP to DFP at a wholesale level – why is this appropriate given their status as a distributor?
- b. What effect would there be to rates if RRRP was not applied to DFP? How would that affect the customers in that class and API's other customers?
- c. Should DFP be a member of the Residential R2 Class? Demonstrate how the costs are equitably apportioned amongst members of that class. What are the implications

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for the other customers of the class by having DFP as a class member? Demonstrate how this provides equitable apportionment of costs within the class.

2. Interrogatory #3

- a. Does this mean no proposals are within the knowledge of API for connections?
- b. Please confirm that there are no new sources of revenue being forecast from new customers for the projected term of this rate application? If there are, provide details.
- c. Please confirm that no plan is in place as to how a new customer would be dealt with? If there is a plan, please produce it?

3. Interrogatory #6.

- a. What discrepancies were considered with respect to local conditions as compared with province wide assumptions made in the Elenchus report?

4. Interrogatory #7 and #9

- a. Please provide documentation comparing and demonstrating that the assets and costs to serve the streetlights are the same as small general service or sentinel/signal light connections. The answers provided do not disclose actual asset or cost numbers.
- b. Essentially Interrogatory #9 remains unanswered.

5. Interrogatories #8 and #11

- a. Please clarify and confirm how many customers are in the street lights class? We see that streetlights are 3% of the asset base and are 0.41% of the consumption. Please provide the total annual revenue associated with street lights?

6. Interrogatories 12-15

- a. Given the approach taken by API to calculate line losses, please describe what is being done to remove unaccounted for energy and energy theft from the lost

energy pool? Are there unmetered loads in API's system
and what is the plan to meter or eliminate those loads?

Yours very truly,
WISHART LAW FIRM LLP



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