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October 1, 2014

BY FAX & BY COURIER

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge St, Suite 2701  
Toronto ON M4P 1E4

Dear Ms. Walli:

**Board File No. EB-2014-0252  
Burlington Hydro Inc. --- Z Factor Application  
Energy Probe – Interrogatories to Applicant**

Pursuant Procedural Order No. 1, please find attached the Interrogatories of Energy Probe Research Foundation (Energy Probe) to Burlington Hydro in the EB-2014-0252 proceeding.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh  
Case Manager

cc. Kathi Farmer, Burlington Hydro (By email)  
Randy Aiken, Aiken & Associates (By email)  
Interested parties (By email)

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**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 Burlington  
Hydro Inc. for an order approving the recovery of certain  
amounts related to the restoration of electricity service in  
the City of Burlington due to an ice storm in December  
2013, to be effective November 1, 2014 for 18 months.

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

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**October 1, 2014**

**BURLINGTON HYDRO INC.  
2014 Z-FACTOR APPLICATION  
EB-2014-0252**

**ENERGY PROBE RESEARCH FOUNDATION  
INTERROGATORIES**

**Energy Probe - 1**

**Ref: Page 1**

**Please provide a copy of BHI's established practices and procedures when restoring service subsequent to storms and extreme weather events.**

**Energy Probe - 2**

**Ref: Page 1**

- a) Did BHI 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 included in this application.**

**Energy Probe - 3**

**Ref: Page 7**

**The evidence states BHI does not budget for extraordinary and random weather events such as the December ice storm.**

- a) What level of costs were included in the historical years of 2010 through 2013 in the EB-2009-0259 cost of service OM&A related to storm damage and/or emergency maintenance/restorations?**
- b) Please indicate where in the EB-2009-0259 rebasing application it is stated that the budget does not include any OM&A costs related to storm damage and/or emergency maintenance/restorations.**

#### Energy Probe - 4

**Ref: Page 8 & Attachment D**

**BHI is proposing to allocate the storm costs to all customer classes in proportion with distribution revenues. In Exhibit 4, Tab 2, Schedule 2, (page 10) in the EB-2013-0115 evidence, BHI states that events such as weather related failures or equipment failures are allocated to account 5025 - overhead distribution lines \* feeders.**

**Please provide a version of Attachment D that shows the derivation of the proposed Z factor if the costs were allocated based on the allocation of account 5025 rather than based on distribution revenues.**

#### Energy Probe - 5

**Ref: Attachment D**

**BHI is proposing to use 2013 customer count/connections to calculate the rate rider.**

- a) **How many customers/connections does BHI forecast that it will have at the end of October, 2014?**
- b) **How many customers/connections does BHI forecast that it will have at the end of April, 2016?**
- c) **Based on the most recent month available on an actual basis, how many customers/connections does BHI have?**
- d) **If the rate rider is calculated based on the 2013 number of customers/connections, does BHI 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 customers/connections be held in the Z-factor account and refunded to ratepayers after the rate rider expires? If not, why not?**
- f) **Would BHI be able to track the revenues received from the rate rider and to refund any over collection to ratepayers by rate class following a review in a subsequent proceeding? If not, why not?**

**Energy Probe - 6**

**Ref: Page 2**

- a) Please provide a copy of BHI's tree trimming policy.**
- b) When was this tree trimming policy implemented and/or changed?**
- c) Please provide the actual tree trimming costs incurred in each of 2011, 2012 and 2013.**