



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

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Michael Janigan
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October 02, 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-2014-0252
Burlington 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: Burlington Hydro Inc.

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

Burlington Hydro Inc. pursuant to section 78 of the Ontario Energy Board Act
for an order or orders approving or fixing just and reasonable rates and other charges
for the distribution of electricity as of November 1, 2014.

Information Requests of the Vulnerable Energy Consumers Coalition (VECC)

Z-Factor Application

VECC-1

Ref: Application, Paragraph 3

Preamble: Burlington Hydro is applying for recovery of a total Z-Factor claim of \$573,047 plus carrying charges of \$6,318.

- a) Please confirm the costs included in the Z-Factor amount are incremental costs (outside of the base upon which rates were derived).
- b) Please confirm that all regular payroll costs and the associated truck costs were deducted from the total cost claim.
- c) Please confirm the amount amounts are directly related to the Z-Factor event and if the ice storm event had not occurred, Burlington Hydro would not have incurred any of the costs.

VECC-2

Ref: Exhibit 1, Page 6, Table 3 Burlington Hydro Materials

- a) Please confirm the materials acquired were at normal rates from regular suppliers.
- b) If not, please provide a breakdown and explanation of the premium paid.

VECC-3

Ref: Exhibit 1, Page 6, Table 4 Burlington Hydro Labour

- a) Please confirm the employee groups that non-union overtime applies to.
- b) Please provide Burlington Hydro's policy regarding non-union over time and include any written policies.
- c) Please discuss how non-union overtime was treated in the past 3 years.

VECC-4

Ref: Exhibit 1, Page 6, Table 5 Contractor Charges

- a) Please provide a separate schedule (breakdown) of each Powerline Contractor invoice based on labour, materials, accommodations, meals, truck, other (provide explanation).
- b) Please provide a separate schedule (breakdown) of each Tree Trimming Contractor invoice based on labour, materials, accommodations, meals, truck, other (provide explanation).
- c) Please provide a separate schedule (breakdown) of each LDC invoice based on labour, materials, accommodations, meals, truck, other (provide explanation).
- d) Please discuss is any premium was paid for any of the above services and provide an explanation.

VECC-5

Ref: Exhibit 1, Page 6, Table 6 Burlington Hydro Other Costs

- a) BHI Fleet \$22,480 – Please provide the inputs to this cost.
- b) Twitter \$6,950 – Please explain how the cost was derived.
- c) BHI Miscellaneous \$8,356 – Please explain the nature of these costs.