



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

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Michael Janigan
Counsel for VECC

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-2014-0102
Oakville Hydro Electricity Distribution 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: Oakville Hydro Electricity Distribution 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

Oakville Hydro Electricity Distribution 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 to be effective January 1, 2015.

Information Requests of the Vulnerable Energy Consumers Coalition (VECC)

Z-Factor Application

VECC-1

Ref: 12. Z-Factor Claim, Page 15

Preamble: Oakville 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, Oakville Hydro would not have incurred any of the costs.
- d) Please provide a breakdown of the costs incurred in 2014 and the timing of the costs.

VECC-2

Ref: 12. Z-Factor Claim, Page 15 - Emergency Operations Plan

- a) Please discuss any deviations from Oakville Hydro's Emergency Operations Plan.

- b) For the previous 5 years, please provide the amount included in base rates related to storm damage and emergency restoration work.
- c) For the previous 5 years, please provide the actuals related to storm damage and emergency restoration work.

VECC-3

Ref: 12. Z-Factor Claim, Page 17

Preamble: Oakville Hydro indicates it provided assistance to other electricity distributors and this cost was not included in Oakville Hydro's restoration costs.

- a) Please discuss if Oakville Hydro charged a premium to assist other LDCs.

VECC-4

Ref: 12. Z-Factor Claim, Page 18 - 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-5

Ref: 12. Z-Factor Claim, Page 18 - Labour

- a) Please provide the number of overtime hours by employee group.
- b) Please discuss if Oakville Hydro incurred non-union employee overtime costs.
 - a. If yes, please provide Oakville Hydro's policy regarding non-union over time and include any written policies.
 - b. Please discuss if Oakville Hydro has paid out non-union overtime in the past 3 years.

VECC-6

Ref: 12. Z-Factor Claim, Page 18 - Third Party Contractor Charges

- a) Please provide a separate schedule (breakdown) of each Third Party Contractor invoice based on labour, materials, accommodations, meals, truck, other (provide explanation).

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

VECC-7

Ref: 12. Z-Factor Claim, Page 19 – Meals, Accommodations and Other Costs

- a) Please provide the percentage of \$6,009 costs for meals, accommodations and other miscellaneous costs allocated to Oakville Hydro.
- b) Please confirm Oakville Hydro followed its corporate policies regarding employee allowances for meals and accommodations.

VECC-8

Ref: 12. Z-Factor Claim, Page 20, Table 7 – Proposed Rate Riders

- a) Please confirm the source for the percentages of allocated revenue requirement and average number of customers/connections.

VECC-9

Ref: 12. Z-Factor Claim – Tree Trimming Policy

- a) Please discuss Oakville Hydro's Tree Trimming Policy and confirm Oakville Hydro's tree trimming time cycle.
- b) In the cycle prior to the storm, please discuss any deviation from Oakville Hydro's tree trimming cycle.