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August 4, 2015

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-2015-0003 – PowerStream Inc.
2016-2020 Customer IR Distribution Rate Application
Interrogatories of Vulnerable Energy Consumers Coalition (VECC)

Please find enclosed the interrogatories of VECC in the above-noted proceeding.

Yours truly,

Michael Janigan
Counsel for VECC

Colin Macdonald, Senior Vice President, Regulatory Affairs & Customer Service
colin.macdonald@powerstream.ca

REQUESTOR NAME	**VECC**
INFORMATION REQUEST NO.	**# 1**
TO:	**PowerStream Inc. (PowerStream)**
DATE:	**August 4, 2015**
CASE NO:	**EB-2015-0003**
APPLICATION NAME	**2016-2020 Customer IR Distribution Rate Application**

SECTION I

SECTION II

Exhibit A

II-VECC-1

Reference: E-A/T1, pg. 3-5

a) Please indicate precisely what elements of the cost of power will be updated annually. For example, will just the rates (e.g. commodity, transmission, etc.) used in the calculation be updated or will any of the following also be updated: i) the RPP/non-RPP split, ii) the ratio of IESO or HON transmission demand to system demand or iii) the ratio of LV usage to peak usage?

Exhibit J

II-VECC-2

Reference: Exhibit J/Tab 1/pg.3 / Section I/T1/S1/pg.4

a) Please provide the updated capital costs of the CIS system.

b) Are all capital costs of this project now completed and in-service?

~~a)~~c) What was the capital and maintenance cost of the CIS system when this project was originally budgeted?

d) Please detail the $1,392,000 in training costs including the period over which this spending is to take place.

e) Is the new billing system shared for the use of water billing or used by any other party?
f) If yes please provide a description of the billing functions that were purchased or developed for the purpose of shared billing.
~~b)~~g) If water billing undertaken by PowerStream is not renewed what is the Utility's proposal for recouping its investments for shared billing.

II-VECC-3
Exhibit J/T2/pg.2

a) What are~~is~~ the current FTEs of PowerStream?

Exhibit H

II–VECC -4~~x~~
Reference: E-H/Appendix H-1-3, pg. 13-14
E-H/T1, pg. 7

a) Please reconcile the forecast negative growth for PowerStream's Large Use class with the Conference Board forecast for "moderate economic growth for the Toronto CMA over the next five years".

II –VECC -5~~x~~
Reference: E-H/T1, pg.6- 7

b) Please provide a schedule that for the years 2102, 2013 and 2014 and for each of the Residential, GS<50 and GS>50 classes compares: i) actual class sales (kWh); ii) predicted class sales (kWh) based on the actual values for the independent variables used in the model for each class and iii) the predicted class sales (kWh) based on the actual values for all independent variables except HDD and CDD, where the weather normal values should be used.
c) Please provide a schedule that sets out the forecast energy sales by customer class (2015-2020) prior to any manual CDM adjustments that reconciles with the total values in Table 1.
d) Please provide a schedule that sets out the forecast energy sales by customer class (2015-2020) after the manual CDM adjustments that reconciles with the total values in Table 1.
e) Please provide the total sales forecasts for 2015-2020 (prior to any CDM

adjustment) using a 20-year trend for HDD and CDD as the definition for weather normal, per the Board's July 2014 Chapter 2 Filing Guidelines (pg. 28).

Exhibit I

II –VECC - 6~~x~~
Reference: E-I, Tab 1, page 4

a) Please provide a schedule using the same format as Table 2 that sets out the Other Operating Revenues for the first six months of 2014 and 2015.

Exhibit L

II –VECC -7
Reference: Cost Allocation Models (2016-2020)

a) With respect to Tab I6.2, please explain why there are no "Secondary Customer Base" customers shown for the GS<50, Street Lighting or USL classes. Don't any of the customers in these classes take service off of PowerStream's secondary system?
b) Do any GS>50 customers take service off of PowerStream's secondary system?

II –VECC -8
Reference: Cost Allocation Models (2016-2020)
EB-2012-0383 – Cost Allocation Policy for Unmetered Loads

a) On June 12, 2015 the Board issued a new cost allocation policy with respect to Street Lighting. When a new Cost Allocation model, consistent with this policy is posted by the Board, please re-run the 2016-2020 models and file updated versions of Appendix 2-P for 2016-2020.
~~a)~~

II-VECC-9
Reference: E-G/T2/ Work Order Variance Reporting
a) What is the variance within which completed orders are not required to be reported?
b) Please provide the gross Work Order Closing Variances for each of the category of projects (System Access/Renewal/Service and General Plant) for the years 2012 through 2014.

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c) Please provide the target for this metric for each year of the plan.

II-VECC-10
Reference E-G/T2

a) Please show the proportion of administrative and capital planning and engineering costs to total capital costs for each of the capital plan categories (i.e. System Access,/Renewal/ Service & General Plant) and for the years 2012 through 2014.

SECTION III

III-VECC-11
Reference: Section III/G-AMPCO-6/E-G/T2/5.2.3

a) Section 5.2.3 of the Distribution System Plan lists various performance measurements. In other places in the application other metrics are provided. Please provide a comprehensive table listing all metrics which PowerStream intends to report on annually as part of this rate plan.
b) For each metric listed above, please add a column which shows the annual target or objective for the noted metric.
c) For each annual target/objective please add a column which describes the consequence (e.g. on future rates or employee compensation), of failing to meet, meeting, or exceeding the metric target. .

III-VECC-12
Reference: Section III/T4/Schedule 1/BOMA-11

The following table is found at page 5 of 43 of the above noted reference

Year	2015	2016	2017	2018	2019	2020
SAIDI Upper Limit (Minutes)	(84.10)	(82.87)	(82.67)	(82.64)	(81.07)	(81.07)
SAIDI target (Minutes)	69.26	68.02	64.69	61.54	59.97	59.97

2: Five year Reliability Targets

a) Please confirm that these targets are used for the purpose of the proposed rate plan.
b) Please indicate what, if any consequence there is of failing to meet these targets.

III-VECC-13
Reference: Section III/A-CCC-3

a) In response to A-CCC-3 PowerStream states that it proposes to use the Board's scorecard as its outcome measures. Please explain how the outcomes of the Scorecard will impact rate setting or employee compensation, or describe what other consequences arise during the plan based on the Scorecard results.

III-VECC-14
Reference: Section III/G-VECC-15 / Section VI/T4/S1/pg.3

a) At Section VI PowerStream states that it "*proposes capital and OM&A spending to improve system reliability and make its system more resistant to outages caused by storms*". Please explain what metrics are being tracked and reported on which will demonstrate whether this objective is met during the course of the proposed rate plan. Please be specific.

III-VECC-15
Reference: Section III/T4/Schedule 1/BOMA-11/Appendix A

a) PowerStream has completed a 5 Year Work Reliability Work Plan. Please explain how this plan is monitored for effectiveness.
b) The Reliability Work Plan contains detailed metrics and with specific objectives. Are these metrics and target outcomes part of PowerStream's rate plan proposal? If yes, please explain how the rate plan is impacted by these metrics.

III-VECC-16
Reference: Section III/T4/S1/BOMA-11/pg.10

a) PowerStream has identified five cause codes as being controllable (1,3,5 & 8). For the years 2011 through 2014 please provide the percentage of SAIDI and SAIFI (excluding MEDs and Loss of Supply). Please provide

the results in both tabular and graph form.

III-VECC-17
Reference: Section III/T4/S1/BOMA-11/pg.18 / Appendix A

a) Please reconcile the projects listed in Appendix A (1-13) with the proposed capital budget for the period 2016-2012. If the amounts proposed to be spent on these projects is different, please revise Table to show the costs, CMI and SAIDI Savings and cost per CMI for the proposed rate plan

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III –VECC 18~~-x~~
Reference: SECTION III/TAB 1/SCHEDULE 1, H-EP #21 a), c) and d); H-EP #22 a); H-EP #25 a), b) and c); H-EP #26 a); and H-VECC #22 a)

a) For purposes of the current proceeding's record, please provide the Excel spreadsheets associated with the responses to each of the pre-application interrogatories referenced above as provided with the original responses.
b) Please provide a "live" version of the Excel spreadsheet for EP #21 d) where the predicted values from each class' equation are not shown as set values but shown as being calculated using the proposed regression model for each class and the independent variables.
c) Please provide a "live" version of the Excel spreadsheet for EP #25 c) where the calculation of predicted 2015-2020 counts for each class are shown (using the class' equation and the forecast values for the independent variables) rather than as just a set value.

III –VECC -19~~x~~
Reference: SECTION III/TAB 1/SCHEDULE 1, H-VECC #21

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a) When was the economic forecast provided by the Conference Board of Canada (per VECC d)) prepared?
b) Is a more recent forecast available? If so, please provide the updated forecast in the same format as Appendix H-1-1.
c) If the response to part (b) is affirmative, please provide an updated forecast, including an updated version of H-EP #21 d).
d) As part of its recent long-term forecast for Ontario, did the OPA produce regional long-term energy forecasts (i.e. for total load)? If so, please provide the OPA's long term (2014-2020) energy forecast for the region encompassing PowerStream's service area and provide the supporting reference(s).

III –VECC -~~x~~20
Reference: E-H/T1, pg. 1 & 3
SECTION III/TAB 1/SCHEDULE 1, H-VECC #21
EB-2015-0004 (Ottawa Hydro), Exhibit C/Itron Report, pg. 4 & 13-14

a) It is noted that Itron supported the preparation of the load forecasts for both PowerStream's and Ottawa Hydro's 2016 Customer IR Applications. Are the historical and forecast values for the Residential Energy Intensity variable used in both applications the same? If not, why not?

III –VECC –~~x~~21
Reference: E-H/T2, pg. 3 and Appendix H-3-1, pg. 2
SECTION IV/TAB 1/UNDERTAKING #27 & #28-1
SECTION III/TAB 1/SCHEDULE 1, H-EP-25 c)

a) Please explain how the historical values for the AR(1) variable, as used in the Residential customer count equation estimation, are determined and provide a schedule setting out the monthly values for 2008-2014.
b) Please provide a live Excel Spreadsheet that sets out the calculation of predicted monthly Residential customer count values for 2008-2014 based on the proposed equation and the values for the independent variables.
c) Please confirm that the forecast values for AR(1) are set out in the EP 25 c) Excel Spreadsheet, Residential Equation Tab, Column E. If not, please indicate where the values can be found and/or provide.
d) Please explain how the forecast values for AR(1) as used in the Residential equation were determined.
e) Please explain how the historical values for the AR(1) variable, as used in the GS<50 customer count equation estimation, are determined and provide a schedule setting out the monthly values for 2008-2014.
f) Please provide a live Excel Spreadsheet that sets out the calculation of predicted monthly GS<50 customer count values for 2008-2014 based on the proposed equation and the values for the independent variables.
g) Please confirm that the forecast values for AR(1) are set out in the EP 25 c) Excel Spreadsheet, GS<50 Equation Tab, Column E. If not, please indicate where the value can be found and/or provide.
h) Please explain how the forecast values for AR(1) as used in the GS<50 equation were determined.

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III –VECC -22~~x~~
Reference: SECTION III/TAB 1/SCHEDULE 1, H-EP #21 and #25

a) It is noted that for purposes of the load forecast a portion of the forecast residential customer count and load was transferred to the GS>50 class on the basis that these customers would be "suite metered" by 3rd party suite metering providers. Please outline how the number of customers to be transferred in each year was determined and how the kWh to transferred were subsequently established.

III –VECC -23~~x~~
Reference: E-H/T2, pg. 1-3
SECTION III/TAB 1/SCHEDULE 1, H-VECC #26
E-H/Appendix H-2-1

a) Please provide a copy of the PowerStream's most recent plan, as submitted to the OPA/IESO, for meeting its 2015-2020 CDM targets.
b) Please confirm that the 2015-2020 annualized CDM savings, as set out in VECC #26 d), are consistent with PowerStream's most recent plan. If not, please update VECC #26 c) and d).
c) Please explain how the total CDM savings by year (per E-H/T2, Table 2) were assigned to customer classes and provide a schedule that sets out class specific values for each year 2015-2019.
d) Please reconcile the 2011-2014 CDM savings set out in Appendix H-2-1 with the OPA Reported results (Table 5) per VECC #26.

III –VECC -24~~x~~
Reference: E-H/T4, pg. 1
SECTION III/TAB 1/SCHEDULE 1, H-VECC #27

a) Were the historic kW/kWh ratio applied to the GWh forecasts after the CDM adjustment?
b) If not, how were the impact of CDM on the billing determinants for the GS>50, Large Use, Street Lighting and Sentinel Lighting determined?

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~~b)~~

III –VECC –25~~x~~
Reference: E-H/T2, pg. 3 and Appendix H-2-1
SECTION III/TAB 1/SCHEDULE 1, H-VECC #26

a) Please provide a schedule setting out PowerStream's proposed 2016-2019 LRAMVA kWh by customer class consistent with its proposed load forecast.
b) Please explain why the manual adjustment for LED Street Lighting is not included in the proposed LRAMVA kWh.
c) Please provide a revised response to part (a) which includes the adjustments for LED Street Lighting as part of the LRAMVA kWh values.

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III –VECC - 26~~x~~
Reference: SECTION III/TAB 1/SCHEDULE 1, I-EP #28 d) and
G-VECC #19 c)

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a) Do Revenue Offsets as currently proposed by PowerStream include either the correction noted in EP #28 d) or the additional potential revenue identified in VECC #19 c)?

III –VECC -27
Reference: SECTION III/TAB 1/SCHEDULE 1, H-VECC 26 a) & e) and
N-VECC #40

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a) With respect to Table N-VECC-40-10, is the 6.5 conversion factor used for converting peak demand savings to billing kW meant to capture the impact of the ½ year rule?
b) For the 2013 non-DR programs, what would the billing kW be if calculated using the kWh savings attributed to the GS>50 class (including reductions for the ½ year adjustment) and the kW/kWh ratio used in the Exhibit H to convert the forecast GS>50 kWh to kW?
c) With respect to Table N-VECC-40-10, please explain why the 2013 persisting saving for the Residential 2012 CDM programs is the same as the initial 2012 reported savings reported by the OPA (VECC #26 a)) when Table 5 of the OPA Report shows a decline in persistence in 2013 for the

2012 CDM programs.

III-VECC-~~Shelly~~28
Reference: Section III/N-VECC-40

a) Please confirm that the kW savings values reported for the Demand Response 3 program are contracted values and not actual demand reductions in each year.
b) Does PowerStream have any record as to how much actual demand reduction was achieved in each year due to the Demand Response 3 program? If so, how much was the actual demand reduction in each year and was the demand reduction coincident with the peak interval used to establish the customers' billing demands?

SECTION IV

IV –VECC –~~x~~ 29
Reference: E-H/Appendix H-1-3, pg. 11-13
SECTION III/TAB 1/SCHEDULE 1, H-VECC #25 c)
SECTION IV/TAB 1/UNDERTAKING #28-2

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a) The response to Undertaking 28-2 states that 65% of the streetlights in PowerStream's service territories are owned by the City of Vaughan, Markham and Barrie. However, the response to VECC #25 c) indicates that the % of HPS lights owned by these three municipalities is 53%. Please reconcile.
b) Based on the municipalities' current plans is it still appropriate to assume that the conversion to LED will be completed over the 2016-2019 period? If not, what are the appropriate revised assumptions?
c) Please provide a schedule that sets out (based on the pre-CDM adjustment load forecast for Street Lighting) the total kWh in each year (2015-2019), the number of connections and the resulting usage per connection.
d) Please reconcile the pre-CDM per connection forecast from part c) with the assumed pre-CDM use of 727 kWh per Undertaking 28-2 used to calculate

the impact of conversion to LED.

e) Based on the foregoing responses please revise the estimated impact of the LED Street Light conversion (Appendix H-1-3, page 13) as required.

IV –VECC - ~~x~~30

Reference: SECTION IV/TAB 1/UNDERTAKING #29 & #41
SECTION III/TAB 1/SCHEDULE 1, B-CCC 14 & 15

a) It is noted that the water billing contracts with both Vaughan and Markham expire December 31, 2015 (UNDERTAKING #29). What assumptions were made regarding the future pricing of water billing services in forecasting water billing revenues (UNDERTAKING #41)?
b) Did these assumptions include an increase in water billing service charges to help cover the incremental costs associated with the 2014& 2015 CIS investments? If not, why not?

IV –VECC -31

Reference: Cost Allocation Models (2016-2020)
E-H/Appendix H-4-1
SECTION IV/TAB 1/UNDERTAKING #28-2

a) The Cost Allocation model reports (Tab I6.2) the number of Street Light connections for 2016 as 30,634 and the number of devices as 88,226. However, UNDERTAKING #28-2 reports the number of connections for 2016 as 88,226. Please reconcile.

SECTION V

V –VECC -32

Reference: E-M/T1, pg. 1-3
SECTION V/TAB 1/SCHEDULE 1, PG. 8-9

a) Please update Tables 1 to 7 from Exhibit M, Tab 1 of the February materials be reflect the updated revenue requirements and cost allocations.
b) Please indicate what the 2016 monthly fixed charge would be if the Residential revenue requirement was recovered entirely through a fixed

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monthly service charge.

c) Please indicate what the 2016 Residential monthly service charge would be, assuming the current (2015) fixed charge was increased ¼ of the way to this value.
d) Please provide the resulting Residential 2016 total bill impacts (i.e. the Residential tables in Appendix 2-W) if this service charge (per part (c)) was adopted and the variable charge decreased accordingly for the following monthly kWh usage levels: 250; 500; 800; 1,000; 1,500 and 2,000.
e) Based on the most recent 12 months of billing data please indicate how many Residential customers fall into each of the following average monthly use categories:
    - 0-100 kWh
    - >100-250 kWh
    - >250-500 kWh
    - >500-800 kWh
    - >800-1,000 kWh
    - >1,000-1,500 kWh
    - >1,500-2,000 kWh
    - >2,000 kWh

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