



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

November 22, 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-2015-0061 – Entegrus Powerlines Inc. – 2016 Rate Application
Interrogatories of Vulnerable Energy Consumers Coalition (VECC)**

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

Yours truly,

M.Garner/for M. Janigan

Michael Janigan
Counsel for VECC

Mr. Christopher Cowell, Chief Financial & Regulatory Officer and VP Administration
chris.cowell@entegrus.com

REQUESTOR NAME	VECC
TO:	Entegrus Powerlines Inc. (or EPI)
DATE:	November 22, 2015
CASE NO:	EB-2015-0061
APPLICATION NAME	2016 COS Application

1.0 ADMINISTRATION (EXHIBIT 1)

1.0-VECC-1

Reference: E1(8)/pgs. 35-65-

- a) Entegrus undertook two customer surveys one by Convergys and the other by Innovative Research Group. Please explain what the different objectives were for the different surveys.
- b) What if any differences were there in the results of the two surveys?
- c) What was the cost of each survey?
- d) Do the surveys distinguish the opinions of customers in the different rate areas? If so how.

1.0-VECC-2

Reference: E1(8)/pg. 75-76

- a) In seeking the opinion of customers on Entegrus' distribution system plan and the proposed capital expenditures included in this application, what measurements did EPI indicate to participants were going to be used to measure the effectiveness or efficiency of its investments? Did customers agree that these were good measurements?
- b) As part of its survey did Entegrus share past SAIDI/SAIFI metrics, capital spending, or any other information which would show the relationship between capital spending a customer service and reliability? If so please summarize (or provide reference to) this information.

1.0-VECC-3

Reference: E1/Attachment 1-H/pgs. 25-26

- a) The results of the Convergys Survey contain a number of recommendations. Please explain how each of these recommendations are addressed in this application

- b) Please provide the cost for addressing each of the recommendations.

1.0-VECC-4

Reference: E1/Attachment 1-J

- a) The Innovative Research Customer Consultation Report contains the results of opinions on the Entegrus's rate harmonization plan. It asks the general questions as to whether customers who receive the same level of service should pay the same rates. Were customers of the various rate areas asked if they thought they received the same level of service as other Entegrus rate zones? If so what was the result of that poll.
- b) Did EPI or its representative poll customers to find out how many understood that EPI has multiple service areas prior to informing them of this fact? If so please provide those results.
- c) It appears that EPI solicited opinions on customers in the Strathroy and Chatham rate zones and not from the Dutton and Newbury Zones. Is this correct? If not please provide the results from the latter two rate zones.

2.0 RATE BASE (EXHIBIT 2)

2.0 – VECC - 5

Reference: E2/pg. 14-/Table 2-11

- a) It is unclear from the evidence the origin of the variances in Board approved amounts for accounts 1808 (-672k) and 1908 (-776k). It appears from the table that EPI (or its predecessors) have underspend (or transferred to assets) with respect to buildings by approximately \$1.3 million from that the Board approved for these utilities in 2010. Please explain.
- b) Please provide the building/land assets on a pre-acquisition basis and the amount after amalgamation of the former utilities.

2.0 – VECC - 6

Reference: E2/pg. 86/ Table 2-16

- a) Please update Table 2-16 for 2015 actuals.
- b) Please add a column showing the remaining 2015 (which added to 2015 actuals provides the current 2015 forecast).
- c) Please provide the amount of spending on Emergencies (2015 Budget

\$220k) to date.

- d) Have the 2 bucket trucks noted in the evidence for 2015 been purchased (pg.94)? If not when are these purchases forecast to take place?

2.0 – VECC - 7

Reference: E2/pg. 93

- a) Please explain why it was not more cost effective to transfer (sell) the 23 load transfer services to Hydro One?
- b) How many remaining load transfer customers does EPI have?

2.0 – VECC - 8

Reference: E2/pg. 93

- a) EPI states it plans on investing \$420k in meter replacements in 2016. Please explain how many meters will be replaced.
- b) In comparison to the previous generation of mechanical (non-smart) meters please explain what, if any differences there are in actual life of the current generation of smart meters.

2.0 – VECC - 9

Reference: E2/Attachment 2-A

- a) Please explain why there are no disposals forecast for either 2015 or 2016, whereas in all past years such disposals have been recorded.
- b) Are any vehicles planned for disposal in 2015 or 2016? If yes please explain why the disposal values are not included in the Fixed Asset Continuity Schedules.

2.0 – VECC - 10

Reference: E2/Appendix 2-AB/Attachment 2-D (pg. 1155 PDF)

- a) Please amend Table 2 of Appendix 2-AB by adding a row for each category which shows the capital contributions associated with that category (e.g. system access capital spending, contributions associated with system access).

2.0 – VECC - 11

Reference: E2/Attachment 2-D

- a) Was the DSP prepared internally or by a third party? If the latter please provide the author's name and qualifications.
- b) Please provide the cost of preparing the DSP.
- c) Please provide the cost of METSCO Asset Condition Assessment.

2.0 – VECC - 12

Reference: E2/Attachment 2-D

- a) Please explain what targets are set as part of the DSP to reduce outages due to Defective Equipment and Tree Contacts.
- b) Please explain what programs in the DSP are targeted at reducing the duration of scheduled outages.
- c) Please provide the outage by cause code metrics used for (a) and (b) and by which EPI will measure the effectiveness of its DSP.
- d) Please EPI's metric targets of outages by cause code. If no targets are currently employed please explain what plans the Utility has to include specific objectives in its DSP.

3.0 OPERATING REVENUE (EXHIBIT 3)

3.0 –VECC -13

Reference: E3/pages 6-7

Load Forecast Model, Purchase Forecast Tab

- a) Does EPI purchase the output from the Tilbury Solar Farm?
- b) If yes, are these purchases included in the Historical Purchases (column B) set out in the Purchase Forecast Tab?

3.0 –VECC -14

Reference: E3/page 8

- a) With respect to the Manufacturing variable, precisely what historical Statistics Canada series did EPI use?
- b) Please clarify whether EPI used the forecast growth rates from the Ministry of Finance's 2014 or 2015 budget.

- c) Please provide either the budget document (or link to the document) used and indicate where the 2.5% growth forecast is found.

3.0 –VECC -15

Reference: E3/page 9

- a) Were the values for the Industrial Production and Seasonal Adjustment Factors established in the 2010 analysis simply combined or were new values determined using the historical data now available?
- b) If the 2010 values were combined, please describe how this done.
- c) If the 2010 analysis was updated using new data, please describe more fully how this was done.

3.0 –VECC -16

Reference: E3/page 11

- a) Please explain why the equation set out at lines 1-7 does not match the equation in the Load Forecast Model – Regression Analysis Tab.
- b) How much (i.e., in terms of kWh) does the trend variable contribute to the predicted purchases for 2006 and 2014 respectively?
- c) What was the impact on EPI's sales of the CDM Programs implemented over the period 2006-2014? Please provide the impacts for each year from programs implemented in that year and previous year, indicating the references for the values reported.

3.0 –VECC -17

Reference: E3/page 11

OEB's Chapter 2 Cost of Service Rate Application Filing
Guidelines, July 16, 2015, page 30

- a) For purposes of the forecast for 2015 and 2016, what definition of "weather normal" was used to establish the values for HDD and CDD?
- b) It is noted that the Filing Guidelines for 2016 Cost of Service Based Rate Applications require that the Applicant provide "the load forecasts based on a) 10-year average and b) 20-year trends in HDD and CDD". Please provide purchase power forecasts for 2015 and 2016 based on: a) a definition of weather normal using a 10 year average and b) a 20-year trend in the HDD and CDD values.

3.0 –VECC -18

Reference: E3/pages 15-16

- a) What customer class is the single customer in the SMP rates zone (per lines 13-15) currently in?
- b) What class was the Embedded Distributor in prior to June 30, 2015?
- c) Please confirm that the Dutton service area does not currently have a separate GS>50 customer class.
- d) For the one customer who opted to become a WMP in mid-2012, was this customer's usage removed from the power purchase data used for modelling for the period when they not a WMP? If not, why not?

3.0 –VECC -19

Reference: E3/pages 17-18

- a) Please clarify whether the historical data set out in Table 3-4 excludes the WMP customers for all years shown.
- b) Using the same customer classes as set out in Table 3-6, please provide the actual customer/connection count by class as of June 30, 2015.

3.0 –VECC -20

Reference: E3/pages 17-18

November 6, 2015 Update

- a) Please confirm that in Table 3-4 the values for Street Lighting are the number of devices and not the number of connections.
- b) The November 6th Update states: *"EPI has updated its Load Forecast to reflect the appropriate number of streetlight connections identified by way of the ongoing LED conversion project in the towns of Strathroy and Mount Brydges"*. However, please confirm that the new values presented in the Update are all with respect to devices and not connections.
- c) It is noted that in Exhibit 8 all of the Street Lighting Service charges are billed "per connection". Please provide the historical number of Street Lighting connections for each of the years 2006 to 2014 (annual average).
- d) Did the LED conversion progress result in any changes to the historic numbers for connections?

3.0 –VECC -21

Reference: E3/page 23

- a) Do the billed kW in Table 3-17 include kW's billed using EPI's existing Standby Rate?
- b) If yes, please indicate where they are included and the annual values.
- c) If no, please provide the annual values and confirm which class they are associated with.

3.0 –VECC -22

Reference: E3/pages 24-27 and Attachment 3-B

- d) Please provide a copy of IESO's Draft 2014 Final CDM Results.
- e) Please provide the final CDM report from the IESO for 2014 as referenced in the November 12th Update.
- f) With respect to the original Application and Load Forecast Model, please reconcile the 10,956,624 kWh in CDM savings in 2014 from 2014 programs per Table 3-20 with the 11,669,000 kWh value shown in Attachment 3-B.
- g) Were the 2014 CDM savings (from 2014 programs) the same in both the Draft and Final IESO Reports? If not, what was the difference and has this change been captured in the Updated Load Forecast model filed on November 6th?
- h) With respect to Table 3-21, are all of the CDM initiatives for the 2015-2020 period related to reducing customer purchases from EPI or are some of the initiatives related to increasing local generation that will be purchased by EPI? If some initiatives fall into the latter category, please revise Table 3-21 such that it only shows the impact of CDM initiatives that will reduce customer purchases from EPI.

3.0 –VECC -23

Reference: E3/pages 27-28

E4/page 101

- a) Please confirm that EPI's LRAM claims are based on the "annualized" CDM results as reported by the OPA/IESO. If not, confirmed, please explain what results are used and indicate where in Exhibit 4 these results are derived from the OPA/IESO reported values.
- b) Assuming part (a) is confirmed, why does the Proposed LRAMVA amount for 2016 (per Table 3-25 from the original Application) include ½ the

savings from 2014 CDM programs?

- c) Assuming part (a) is confirmed why does the Proposed LRAMVA amount for 2016 (per Table 3-25) include only ½ the planned saving from 2016 CDM programs.
- d) Why are the 2014 Large Use CDM savings removed from the LRAMVA in Table 3-25 when they are not related to the co-generation project?
- e) Please explain more fully why it is appropriate to exclude the WMP from the allocation of CDM program savings?
- f) Were the two customers who are currently WMP eligible to participate in past the OPA/IESO CDM programs and did they?
- g) Do either the November 6th or November 12th Updates change the LRAMVA Baselines by customer class for 2016? If so, please update Table 3-25.

3.0 –VECC -24

Reference: E3/page 29

- a) How many months of consecutive data does EPI now have for the most recent WMP customer?
- b) If twelve or more are available, what would the total 2015 forecast use for the two customers be if the latest 12 months of actual data were used to estimate this customer's 2015 usage?

3.0 –VECC -25

Reference: E3/pages 30-31 and pages 44-45

Load Forecast Model, 2016 Revenue at Old Rates Tab
November 6th Update

- a) Please provide details regarding the adjustments made to the Large Use load forecast per Table 3-28 in order to derive the values set out in Table 3-29.
- b) Please reconcile the billing determinants for 2016 used for rate design as set out in Table 3.-29 with those set out in the above referenced Tab of the (August 2015) Load Forecast Model (Rows 35-56) for the GS>50, Intermediate and Large Use classes and also Table 3-47.
- c) Please reconcile the total distribution revenues at existing rates for 2015 and 2016 as set out in Table 3-46 versus that reported in the (August 2015) Load Forecast Model (2016 Revenues at Old Rates Tab – Rows 32 and 58) and used in the RRWF.
- d) Please revise Table 3-28 and Table 3-29 to reflect the updated November

6th Load Forecast.

3.0 –VECC -26

Reference: E3/page 63

- a) Please provide the actual revenue offsets for the first half of 2014 and 2015 (i.e., as of June 30th for each year) using the same format as in Table 3-66.

3.0 –VECC -27

Reference: E3/page 65 and Appendix 2-H (Account 4375)

- a) Why are the revenues shown for Water/Sewer Billing for 2015 and 2016 materially less than those reported for 2010 and 2011 (per Appendix 2-H)?
b) How were the charges for the services provided to Chatham Kent Public Utilities Commission (described at lines 3-5) established?

4.0 OPERATING COSTS (EXHIBIT 4)

4.0 – VECC – 28

Reference: E4/pg. 13

- a) Please provide the source of Table 4-4.
b) Please provide for each year 2010 through 2015 CPI actuals (2015 to month end).

4.0 – VECC – 29

Reference: E4/pg. 13

- a) Please provide the EDA fess paid for each of 2010 through 2014 and the forecast amounts for 2015 and 2016.

4.0 – VECC – 30

Reference: E4/pg. 13

- a) OM&A costs have increased \$1.6 million as between 2011 actuals and 2016 forecast. Please provide a breakdown of these costs as between:
- related to IFRS transition;
 - related to incremental costs for smart metering (please specify as

- between IT, labour and other costs);
- related to incremental cost for regulatory burden (please specify); and,
- other costs.

4.0 – VECC – 31

Reference: E4/Table 4-8

- Please explain how the bad debt cost forecast for 2015 and 2016 was calculated.

4.0 – VECC – 32

Reference: E4/pg. 22/Table 4-8

- EPI has seen a reduction in insurance costs since 2011. Who is the insurance provider used by Entegrus.

4.0 – VECC – 33

Reference: E4/pg. 22/Table 4-8

- Community Relations costs have increased by over 300%. What portion of these costs are driven by new regulatory requirements?

4.0 – VECC – 34

Reference: E4/pg. 25

- Vegetation control OM&A costs have increased significantly since 2010. Please explain what metrics, measurements or qualitative assessments are done to understand the benefit of an increased budget in this area.

4.0 – VECC – 35

Reference: E4/pg. 25

- EPI is spending significantly more on power quality OM&A related projects than in the past. Please explain how these costs are allocated as between residential and other rate classes.
- Please provide the reference in the customer surveys showing that a majority of residential customers are seeking a reduction in momentary outages.
- Has EPI any evidence with respect to the magnitude and cost of momentary on residential customers.

4.0 – VECC –36

Reference: E4/pg. 22/Table 4-8

- a) Please explain what drives the significant increase in “Minor System Repairs” in 2015 and 2016.
- b) Please provide the actual spending on this category to date for 2015.

4.0 – VECC – 37

Reference: E4/pg. 46

- a) Between 2014 and 2016 FTEs increase from 71.4 to 76.5. Please provide a list of each incremental position in this period.
- b) Please provide the rationale/business case for each new hire.
- c) Please provide the salary range for each new position (not individual salaries).
- d) For any hires which are in anticipation of a retirement please provide the estimated date of retirement and the length of the overlap period. Please explain the rationale for the overlap period.
- e) Please explain the increase in executive FTEs of 3.2 between 2014 and 2016.

4.0 – VECC – 38

Reference: E4/pg. 67

- a) Has the OEB identified any one-time costs for this application related to its review of the DSP? If yes please provide the estimate provided and indicate whether this amount is included in the forecast of regulatory costs.

4.0 -VECC -39

Reference: E4/102 – 103 and Attachment 4-U

OEB Filing Guidelines, Chapter 2, Section 2.4.6.2 and 2.4.6.3

- a) Please explain why EPI is claiming for lost revenue for 2014 from 2006-2010 programs by SMP when the Chapter 2 Filing Guidelines (page 44) states that:

Furthermore, the OEB expects that any LRAM claims for the period prior to 2010 have been completed. Therefore, no LRAM claims are expected in 2014 or later cost of service applications.

4.0 -VECC -40

Reference: E4/Appendix 4-U, Table 1

November 12, 2015 Evidence Update, Attachment A, Tables B-5 to B-7 and Attachment B, Tables B-5 to B-7

- a) With respect to Appendix 4-U - Table 1, what is the basis for the kWh and kW savings values that are assumed to persist in 2014 from 2006-2010 programs? Please provide any relevant documentation.
- b) In Appendices 4-U, Table 1, the reported peak kW savings for the demand billed classes are converted to billing demand by multiplying the value by 12. What is the IESO/OPA's definition of peak for purposes of reporting verified demand reductions (e.g., is it the average peak reduction in the summer months, over the 12 months of the year, or over some other period)?
- c) In Appendices 4-U, Table 1, the reported peak kW savings for the demand billed classes are converted to billing demand by multiplying the value by 12. This differs from the treatment of these classes in Attachment A and B of the November 12th Update where the comparable Tables state that: *"Where billing is by monthly demand (kW), the annual demand is multiplied by the number of months they are estimated to apply to for determining annual load impacts"*. Please explain the difference in treatment.
- d) In Attachments A and B (Tables B-5 to B-7), for demand billed classes the reported peak kW savings are converted to billing demand by multiplying "the number of months they are estimated to apply for".
 - i. Please indicate who the "estimation" was performed by.
 - ii. What is the IESO/OPA's definition of peak for purposes of reporting verified demand reductions (e.g., is it the average peak reduction in the summer months, over the 12 months of the year, or over some other period)?

5.0 COST OF CAPITAL AND RATE OF RETURN (EXHIBIT 5)

5.0-VECC-41

Reference: E5

- a) Entegrus is funding \$48.471 in long-term debt in rates for 2016. However it appears that it actually has notes payable in the order of \$49.523. If this is correct please confirm and explain the discrepancy.
- b) All of Entegrus's long-term debt is with its affiliate. Please provide the evidence that the Utility has done its due diligence to obtain long-term debt

at the best possible rate.

6.0 CALCULATION OF REVENUE DEFICIENCY/SURPLUS (EXHIBIT 6)

N/A

7.0 COST ALLOCATION (EXHIBIT 7)

7.0 – VECC –42

Reference: E7/pages 7-8

E3/page 31

E8/Attachment 8-F (Proposed 2016 Rates)

- a) Please confirm that, for the customer with self-generation, the 7.2 MW contract value was used to determine the 86,400 kW value reported in Table 3-29.
- b) With respect to the Standby Rate set out in Attachment 8-F, how will EPI determine “a month where Standby power is not provided” and therefore the rate applies?
- c) In such circumstances, how will the billing determinant that the rate is to be applied to be determined and what is the relevance of the 7.2 MW contract value in making this determination?
- d) Given the customer has a gross load of 11 MW and installed generation with a total nameplate rating of 9.9 MW (5.2 + 4.7), what is the basis for the 7.2 MW contract value and what is it supposed to represent?.
- e) Please indicate how the customer will be billed under each of the Large User Rate and the Standby Rate for each of the following circumstances, assuming that in all cases the peak load of the plant (i.e., delivered plus self-generation) is 11 MW:
 - i. Both generators operate continuously all month and the customer’s metered peak demand for delivered load is 1.1 MW.
 - ii. Both generators are out of service at the same time during month and the customer’s metered peak demand for delivered load is 11 MW.
 - iii. Operation of the customer’s generation during the month is such that the metered peak demand for the delivered load is 5 MW.
 - iv. Operation of the customer’s generation during the month is such that the metered peak demand for delivered load is 8 MW.
- f) The Application states that the Standby treatment is the same as that

approved for Horizon. Is EPI's approach to determining the billing determinant for Standby the same as that approved for Horizon?

- g) Do each of the generators have metering acceptable for utility billing purposes?
- h) Please provide responses to parts (b) and (e), based on the currently approved Standby Power Service Rate for the CK service area.

7.0 – VECC –43

Reference: E7/pages 8-9

- a) Please describe the circumstances that give rise to HONI's Dresden DS being virtually embedded in EPI but not making use of any of EP's distribution facilities, such that no capital costs are related to it.
- b) For what activities does EPI incur operating costs with respect to HONI's Dresden DS?
- c) The Application states (page 9) that only billing and collecting, along with some administration costs and general service capital are allocated to the embedded distributor class. However, the Cost Allocation model (Tab O4) shows dollar allocations for various distribution plant accounts to this class. Please reconcile.
- d) Is the \$814 noted on page 5 meant to be the \$830 shown as allocated to the embedded distributor class per Tab O1 of the (August 2015) Cost Allocation model?

7.0 – VECC –44

Reference: E7/pages 13-14

- a) With respect to the Break Out of Assets (CA Model, Tab I4), please explain why there is a breakout of 33.4% of Underground Conductors and Devices to Secondary when there is no breakout of Underground Conduit to Secondary.

7.0 – VECC –45

Reference: E7/pages 15 & 19 and Cost Allocation Model, Tab I6.2

- a) Please explain how, in the case of USL customers, the connections are part of another metered account.
- b) Wouldn't including sentinel or USL connections in another accounts bill add to the complexity of the billing for that account? If not, why not? If yes, how is this captured in the CA model if no bill count is assigned to these

classes?

- c) Are all of the EPI's customers billed on a monthly basis?
- d) Please explain the derivation of the Number of Bills shown for Residential, GS<50 and GS>50 in Tab I6.2.

7.0 – VECC –46

Reference: E7/page 17 and Cost Allocation Model, Tab I6.1
E3/page 31

- a) Please why explain why for the Large Use class the load forecast set out in Table 3-29 (and labelled as being for Cost Allocation) was not used in Tab I6.1.

7.0 – VECC –47

Reference: E7/pages 20-21 and Cost Allocation Model, Tabs I7.1 and I7.2

- a) Who owns the meter for the Embedded Distributor?
- b) Who does the meter reading for the Embedded Distributor and are there any associated costs borne by EPI?
- c) Why are there no meter reading costs for the Large Use class?
- d) Who does the meter reading for the Large Use class customers and are there any associated costs borne by EPI?

7.0 – VECC –48

Reference: E7/pages 21-23 and Cost Allocation Model, Tab I8

- a) Were the 2014 hourly loads used for the Residential, GS<50 and GS>50 customer classes weather normalized prior to determining the NCP and CP values?
- b) Please provide a schedule that compares the CDD values for June to September 2014 with the "weather normal" values used for purposes of the load forecast.
- c) Please confirm that, with the exception of the Large Use class, the results set out in Table 7-10 are based on applying the 2014 load profiles for each class to the 2016 forecast kWh for the class? If not confirmed, how were the values in Table 7-10 established?
- d) What was the time (day and hour) of EPI's peak for each month in 2014 that was used to determine the CP value?
- e) Please describe how the non-coincident monthly peak values were established for the Street Lighting and Sentinel classes and why they don't

equal the average monthly billing demand per Table 3-29.

- f) Please update Table 7-10 to reflect the November 6th Update.

7.0 – VECC –49

Reference: E7/pages 22-23 and Cost Allocation Model, Tab I8

- a) Please explain why, for the customer with the new self-generator in 2015, the 2016 forecast kWh prior to CDM was considered appropriate for purposes of determining the load profile data in Table 7-10? In doing so, please explain how this is consistent with the 7.2 MW contract set for this customer.
- b) For the Large Use class, was: i) each customer's hourly 2016 load profile determined separately using its 2014 interval data and 2016 load forecast and then combined or ii) was a combined load profile developed using the 2014 interval data for both customers applied to the total 2016 Large Use load forecast (adjusted for the one customer to be prior to CDM)?

7.0 – VECC –50

Reference: E7/pages 28-29

November 6th, Updated Cost Allocation

- a) Please provide a copy of Appendix 2-P based on the Updated Cost Allocation and EPI's proposal for 2016.
- b) Please provide a schedule setting out how the costs allocated to the Large Use class were allocated as between the CK Large Use and the SMP Large Use customers.
- c) What is the level of overearning (page 28, lines 6-7) if all of the RTC ratios are adjusted as outlined at lines 3-6 (page 28)?
- d) Without any mitigation plan, what would be the total bill impact (%) on the Large User in the SMP rate zone of adjusting the Large Use class' RTC to 85% and applying the resulting rates to both customers?
- e) What is the revenue shortfall for EPI if the rates for the SMP Large User are set as proposed versus set equivalent to the proposed 2016 rates for its other Large User?
- f) To what level would the proposed revenue to cost ratios (per part (a)) for the GS<50, USL and Street Lighting ratios need to be increased to make up the shortfall identified in response to part (c)?

8.0 RATE DESIGN (EXHIBIT 8)

8.0 –VECC - 51

Reference: E8/pages 6-7

November 6th, 2015 Updated Load Forecast

- a) Please explain how the transformer ownership allowance was treated in determining the variable revenues shown in Table 8-3.
- b) Please provide an updated version of Table 8-3 based on the Updated Load Forecast and include a schedule that set out the rates and volumes used for each customer class.

8.0 –VECC - 52

Reference: E8/pages 6-8 and 12-14

November 6th, 2015 Updated Load Forecast

November 6th, 2015 Updated Bill Impact Analysis

EB-2015-0294

- a) Please provide an updated version of Table 8-4 based on the Updated Load Forecast.
- b) Please re-do the Updated Residential Bill Impact analysis and provide a revised version of Table 8-11 but reflect in the rates used for 2015 and 2016 the following:
 - The planned elimination of the Debt Retirement charge for 2016,
 - The planned elimination of the OCEB for 2016, and
 - The OESP charge to be implemented in 2016 per EB-2015-0294
 - The reduction in the WMS charge for 2016 per EB-2015-0294.
- c) 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 for each of the four service areas:
 - 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

8.0 –VECC - 53

Reference: E8/pages 8-10 and Table 8-3

- a) With respect to Table 8-3, does the kW billing determinant used for Large Use - CK include the forecast Standby billing quantities for 2016? If not, please re-do the revenue calculations in Table 8-3 so as to include these amounts and provide the billing determinants used based on the Updated Load Forecast.
- b) Based on the November 6th, 2015 Updates, please provide an updated version of Table 8-5 and include the billing determinants used to determine the 2016 proposed rates.

8.0 –VECC - 54

Reference: E8/pages 10-12
November 6th, 2015 Updates

- a) Please provide revised versions of Tables 8-6, 8-7, 8-8 and 8-9 that reflect the November 6th, 2015 Updates.

8.0 –VECC - 55

Reference: E8/page 31

- a) Please confirm that the reference at line 14 to “Arrears Certificate” should read “Statement of Account”.
- b) Under what circumstances does EPI apply the Credit Reference/Credit Check charge? In particular, under what circumstances would a customer opening a new account with EPI face this charge?
- c) Does EPI have the capability to remotely disconnect and reconnect customers with smart meters?
- d) Under what circumstances would each of the following charges apply: i) Service Call – customer owned equipment and ii) Service Call – after regular hours?

8.0 –VECC - 56

Reference: E8/Attachment 8-F

- a) Please confirm that all of the tariff sheets in this Attachment should read “Effective and Implementation Date May 1, 2016” and not May 1, 2014.

9.0 DEFERRAL AND VARIANCE ACCOUNTS (EXHIBIT 9)

9.0 –VECC -57

Reference: E9/pg. 28

- a) EPI is seeking to recover \$417k for wages etc. of staff added to support the transition to IFRS. Please provide details as to what staff was added for this purpose including when they were hired and when they were terminated for this project.

End of document