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BY E-MAIL

December 18, 2015

John Pickernell
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Mr. Pickernell:

**Re: Brant County Power Inc.
2016 IRM Distribution Rate Application
OEB Staff Interrogatories
OEB File No. EB-2015-0054**

In accordance with Procedural Order #1, please find attached OEB Staff interrogatories in the above proceeding. The applicant and the intervenor have been copied on this filing.

Brant County Power Inc. responses to interrogatories are due by January 19, 2016.

Yours truly,

Original Signed By

Kelli Benincasa
Electricity Rates and Accounting

Encl.

**Brant County Power Inc.
EB-2015-0054
OEB Staff Interrogatories**

Interrogatory #1

Ref: Managers Summary Page 19 – Shared Tax Savings

Ref: Rate Generator Model Tab 8 – Shared Tax Rate Rider

**Ref: Chapter 3 Filing Requirements for Electricity Distribution Rate Applications
3.2.7 Tax Changes**

Rate Class		Total kWh (most recent RRR filing)	Total kW (most recent RRR filing)	Allocation of Tax Savings by Rate Class	Distribution Rate Rider	
RESIDENTIAL SERVICE CLASSIFICATION	kWh	81,835,503		-3,625	-0.04	\$/customer
GENERAL SERVICE LESS THAN 50 KW SERVICE CLASSIFICATION	kWh	37,296,462	791	-1,273	-0.0000	kWh
GENERAL SERVICE 50 TO 4,999 KW SERVICE CLASSIFICATION	kW	165,127,616	362,451	-2,091	-0.0058	kW
UNMETERED SCATTERED LOAD SERVICE CLASSIFICATION	kWh	442,068		-16	-0.0000	kWh
SENTINEL LIGHTING SERVICE CLASSIFICATION	kW	176,956	353	-29	-0.0817	kW
STREET LIGHTING SERVICE CLASSIFICATION	kW	1,696,635	4,770	-332	-0.0696	kW
Total		286,575,240	368,365	-\$7,365		

OEB staff notes there are insignificant rate riders in several rate classes for Brant County Power. Please confirm if Brant County Power wishes to transfer the tax sharing amount to Account 1595 for disposition at a future date.

Interrogatory #2

Ref: Managers Summary Pages 12-13 – Rate Design Changes

Ref: Rate Generator Model Tab 15 – Rev2Cost_GDPIPI

Brant County Power is proposing not to mitigate rates even though the monthly fixed charge will be \$4.37 over 4 years.

- A) Please confirm that if the number of years to transition to the new rate design was changed to 5 years, the impact would be \$3.49.
- B) Brant County Power states “that extending the transition period to 5 years, or one year following rate harmonization for Brant County Power customers would cause unnecessary customer confusion.” Please provide an explanation of what the confusion would be.

Interrogatory #3**Ref: Chapter 3 Filing Requirements for Electricity Distribution Rate Applications
3.2.5.2 Global Adjustment**

Chapter 3 section 3.2.5.2 of the filing requirements states “As a new addition for 2016 applications, a distributor must now provide a description of its settlement process with the IESO or host distributor. It must specify the GA rate it uses when billing its customers (1st estimate, 2nd estimate or actual) for each rate class, itemize its process for providing consumption estimates to the IESO, and describe the true-up process to reconcile estimates of RPP and non-RPP consumption once actuals are known. The description should detail the distributor’s method for estimating RPP and non-RPP consumption, as well as its treatment of embedded generation or any embedded distribution customers. Distributors are reminded that they are expected to use accrual accounting.”

Please provide the description as indicated above for settling the GA with the IESO.

Interrogatory #4**Ref: Appendix A – LRAMVA Report**

Brant County Power has requested approval of a total LRAMVA amount of \$165,362. This LRAMVA amount represents the lost revenues due to the delivery of CDM programs in 2011, 2012, 2013 and 2014. Brant County Power retained IndEco Strategic Consulting Inc. to prepare a third party report that details the lost revenue calculations.

- a) If available, please provide a live excel file that includes all final program results as prepared by the OPA (now IESO), including persisting savings, the energy and peak demand savings weighting for all programs, and the applicable distribution rates that were all included in the calculation to determine the lost revenues sought for recovery.
- b) IndEco notes throughout its LRAMVA Report that persistence results are as reported by the IESO. Please provide the supporting evidence, including any documentation, that IndEco relied on when determining the persistence level of results from 2011, 2012 and 2013.
- c) Throughout Appendix B of the LRAMVA Report, IndEco notes that “monthly kW values are multiplied by the number of months they are estimated to apply to for determining annual load impacts”. Please provide the monthly multiplier factors for all peak demand savings (kW) results where lost revenue amounts are calculated and any supporting information for these values.