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January 5, 2016

VIA E-MAIL

Chris Cowell
Entegrus Powerlines Inc.
320 Queen St.
P.O. Box 70
Chatham, ON N7M 5K2
Dear Mr. Cowell:

Re: EB-2015-0061 – Entegrus Powerlines Inc. – 2016 Rate Application
Pre-ADR Clarification Questions

In accordance with Procedural Order No. 1 a Settlement Conference with respect to above application is scheduled to be convened starting January 12, 2016. After reviewing the initial Application, the November 2015 Update and Entegrus' interrogatory responses, VECC has identified a number areas requiring clarification before we can meaningfully participate in the Settlement Conference.

Typically these questions would be raised at a technical conference. However, no such conference has been scheduled for this proceeding. In order to expedite the process VECC is providing questions of clarification at this time and so that Entegrus will have an opportunity to address them on or before January 12th.

We continue to review the interrogatory responses and may have further questions. We will do our best to provide these in advance of January 12th.

Yours truly,

B.Harper /for
Michael Janigan
Counsel for VECC

cc. Ontario Energy Board, Board Secretary
Stephen Vetsis, stephen.vetsis@ontarioenergyboard.ca
Registered Intervenors

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ENTEGRUS' 2016 RATE APPLICATION (EB-2015-0061)
VECC'S PRE-ADR CLARIFICATION QUESTIONS

3.0 OPERATING REVENUE (EXHIBIT 3)

VECC –CQ 58

Reference: VECC #16 c)

a) The original question asked for the impact of CDM programs implemented over the period 2006-2014 on EPI's sales. The response provided revenue impacts by year, whereas what the question was seeking was the kWh impacts of the programs implemented in each of the year's 2006-2014 on the sales (i.e. kWh delivered) to customers in each of those years. Please revise the table accordingly.

VECC – CQ 59

Reference: VECC #23 g)

a) For the demand billed classes, please also provide the kW values for the LRAMVA Baselines and indicate how they were determined.

VECC – CQ 60

Reference: VECC #27a)

a) VECC 27 a) indicates that revenues for Water/Sewer Billing in 2010 and 2011 were recorded using a different basis for accounting. It is also noted that no revenues from these activities are reported for 2012-2014. Please explain the basis for accounting for these revenues in: a) the 2010-2011 period, b) the 2012-2014 period and c) the 2015 – 2016 period.

4.0 OPERATING COSTS (EXHIBIT 4)

VECC – CQ 61

Reference: VECC #40 b)

a) The response to VECC #40 b) suggests that for the CDM programs impacting on demand billed customers the IESO definition of "peak" includes all 12 months of the year. However, the IESO's Final Report: Evaluation of Business Incentive Programs states (page D-14) that "the IESO has judged

that summer peak demand savings should be used for reporting". This report can be found at
http://cms.powerauthority.on.ca/sites/default/files/conservation/2014-Evaluation-Business-Initiatives.pdf
Also, in EB-2015-0083, Kingston Hydro in response to Technical Conference Undertaking JT2.7 as to the definition of peak period stated:

> From the definitions in the Master CDM Agreement executed between all Ontario LDCs and the IESO:
>
> "**Peak Demand Savings**" means electricity peak demand savings determined pursuant to the OPA EM&V Protocols.
>
> From ERII Schedule F, EM&V Protocols Section 3:
> **Demand Savings** (kW) are the maximum reduction in electricity demand between the Base Case and the Energy Efficient Case occurring in the same hour between 11 a.m. to 5 p.m. on business days, May through October.

Please provide the IESO documentation supporting EPI's contention that the peak period applicable to CDM programs impacting demand billed customers extends over the each of the 12 months of the year.

7.0 COST ALLOCATION (EXHIBIT 7)

VECC – CQ 62

Reference: VECC #48 a)

a) Given that the load data for 2014 was not weather normalized, what would be the cost allocation results if the load profiles based on 2004 data were used for the weather sensitive customer classes?

VECC – CQ 63

Reference: VECC 48 e)

a) The response to VECC 48 e) suggests that Sentinel and Street Lights are interval metered. Please confirm whether this is the case. If not, please indicate how the NCP values for these classes were established. If yes, why are there no meter capital and meter reading costs attributed to these classes?

b) If the billed kWh by day and by hour are estimated based on connected load and hours requiring lighting, why wouldn't the billed amount equal the connected load (i.e., connected kW) and be equivalent to the NCP?

VECC – CQ 64

Reference: VECC #45 a)

a) Can EPI confirm that all USL connections have another metered account associated with them and that in no instances is a separate bill issued strictly for the USL connection? If not, how many are there?

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