

## ***Aiken & Associates***

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### **BY EMAIL and RESS**

June 26, 2016

Borden Ladner Gervais  
40 King Street West  
40th Floor  
Toronto, Ontario

### **Attn: James Sidlofsky**

Dear. Mr. Sidlofsky:

### **Re: EB-2015-0072 - Grimsby Power Incorporated - Materials for Oral Hearing**

We represent Energy Probe Research Foundation in this proceeding. This letter is being sent to request the update of a number of tables and the provision of additional information that will be used in the cross examination on PILs and OM&A at the oral hearing in this matter.

We would ask that updates and additional information be filed with the Board this week, so that they can be reviewed prior to the oral hearing. This information will likely result in reduced cross examination and eliminate the need for this information to be updated and/or provided through undertakings.

With respect to PILs, Energy Probe is requesting the following:

- 1) Please provide a table that shows, by line item, the calculation of each of the 2015 actual PILs and the 2015 PILs Model, as included in the settlement agreement. In addition to the two columns shown for the actual PILS and the PILS model for 2015, please add a third column that shows the difference between the two figures, and a fourth column that provides an explanation for the difference.
- 2) Please file the actual 2015 tax returns.
- 3) Please provide a version of Table 4-62 (based on the response to 4-Energy Probe-34) that splits the calculation of the income taxes into two parts. The first part shows all the accounting net income, additions and deductions used in the PILS model and the second part shows all of the accounting net income, additions and deductions not included in the PILs model. Please provide a taxable income for PILs purposes as a subtotal at the end

of the first part and a second subtotal at the end of the second part that reflects the changes in taxable income due to the additional changes made.

With respect to the OM&A forecast for the 2016 test year, please provide the following:

- 1) Please provide a version of Table 4-3 that includes two additional columns - the first added column shows the actual OM&A spent in 2016 for the most recent year to date period available in 2016 and the second added column that shows the actual OM&A for the corresponding year to date period in 2015. Please state the last month of actuals included in the 2016 data. Please also provide the total OM&A associated with the NWTC in the year to date period for 2016.
- 2) Please add a column to Table 4-20 (as found in the response to 4-VECC-33) that reflects the actual number of full time equivalents in 2016 as of the end of June.

Thank you for your co-operation.

Yours very truly,

*Randy Aiken*

Randy Aiken  
Aiken & Associates

cc: David MacIntosh (Energy Probe)  
Interested Parties