**AMPCO-1**
Ref: Exhibit B, Tab 2, Schedule 1

1. Please provide a list of the rate riders where the OEB may have to limit the duration of the riders.

**AMPCO-2**

Ref 1: Exhibit B, Tab 5, Schedule 1, Page 2
Ref 2: Attachment 11, City of Vaughan, Extract from Special Council Meeting Minutes of October 7, 2015, Page 14

Preamble: At Reference 1 the evidence indicates the proposed transaction results in lower LDC Co. rates than the status quo during the rebasing deferral period. At Reference 2, the benefits to the City of Vaughan indicate future utility rate reductions of $40 per customer per year.

1. Please provide the detailed analysis to support these statements.

**AMPCO-3**

Ref: Exhibit B, Tab 5, Schedule 5, Page 5

1. Please provide the number of existing call centres and control rooms currently in place for each of Enersource, Horizon, PowerStream and Hydro One Brampton.
2. Please explain why the Holdco Head Office, LDC Co Head Office and the Sustainability and Innovation Head Office are not proposed to be located at one facility.

**AMPCO-4**
Ref: Exhibit B, Tab 6, Schedule 1

Preamble: The evidence indicates the anticipated gross savings of LDC Co. are $354.6 million in operating costs and $167.6 million in capital costs.

1. Please provide a detailed breakdown and description of the gross operating savings by year.
2. Please provide a detailed breakdown and description of the gross capital savings by year.
3. Please provide the assumptions, analysis and calculations used to arrive at the projected annual savings amounts.
4. Please identify any specific factors that may affect the achievement of the expected efficiencies and the recovery of costs associated with the proposed transaction in the timelines projected.
5. Please explain how the forecast savings take into account the forecast productivity savings previously identified in the last rebasing or Custom IR applications of the four LDCs pre-merger.
6. Please provide the total gross payroll reduction savings over the ten year period 2016 to 2025.
7. Please provide the total employee reductions by year for the years 2016 to 2025.

**AMPCO-5**
Ref: Exhibit B, Tab 6, Schedule 1, Figure 25

1. Please provide a detailed breakdown and description of the forecast transition costs by year charged to operating and capital.
2. Please confirm if in-house staffing costs are included in the transition costs.

**AMPCO-6**
Ref: Exhibit B, Tab 6, Schedule 1

1. Please complete the following Table to show the existing FTE levels of the four Parties pre-merger.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **FTEs** | **Enersource** | **Horizon** | **PowerStream** | **Hydro One Brampton** |
|  |  |  |  |  |
| Executive Management |  |  |  |  |
| Senior Management |  |  |  |  |
| Management |  |  |  |  |
| Non-Union |  |  |  |  |
| Union |  |  |  |  |
| Temporary |  |  |  |  |
| Total |  |  |  |  |

1. Please provide the number of vacancies for Enersource, Horizon, PowerStream and Hydro One Brampton at December 31, 2015.
2. Please provide the total number of FTEs in the categories in part (a) for LDC Co. for the years 2016 to 2025.

**AMPCO-7**
Ref: Exhibit B, Tab 5, Schedule 1, Page 3

Preamble: The evidence indicates Operations staffing levels will not be changing.

1. Please identify the specific areas where staffing levels will be changing as a result of the consolidation.

**AMPCO-8**

Ref: Exhibit B, Tab 7, Schedule 1, Page 1

Preamble: The evidence states “During the rebasing deferral period, LDC Co may apply for rate adjustments using the Board’s ICM as may be necessary and in accordance with applicable Board policies with respect to eligibility for, and the use of, the ICM.

1. Which years post merger does LDC Co. anticipate an ICM request and rate adjustments.
2. Please explain the forecast need for an ICM for Enersource, Horizon, PowerStream, and Hydro One Brampton.
3. Please provide all assumptions regarding an ICM that are built into the current application.
4. Please describe how an ICM would be structured and geographically applied within the context of the new merged entity.

**AMPCO-9**

Ref: Exhibit B, Tab 6, Schedule 1, Page 4, Figure 26

1. Please explain the decrease in distribution revenue in 2026.
2. Please explain the increase in distribution revenue in 2027.
3. Please explain the forecast increases in distribution revenue beyond 2027 (2028 to 2039).
4. Please provide all assumptions regarding an ICM in Figure 26.
5. Please provide the forecast revenue by year to be collected from any ICM recovery rate riders.
6. Please recast Figure 26 without an ICM.

**AMPCO-10**
Ref: Exhibit B, Tab 5, Schedule 1, Page 6

Preamble: LDC Co expects be a leader in instituting CDM initiatives and will be able to reduce duplicate program administration costs.

1. Please provide the CDM targets for the merged entity.
2. Please confirm the reduced CDM administration cost savings are included in the operating savings.

**AMPCO-11**

Ref: Exhibit B, Tab 5, Schedule 1, Page 5, Figure 20

1. For each year for SAIDI and SAIFI, please add the following adjustments to the Figure: Major Event Days Adjusted, Scheduled Outages Adjusted.
2. Please add the reliability data for 2015 to the table in part (a).

**AMPCO-12**

Ref: Exhibit B, Tab 5, Schedule 1, Page 6, Figure 21

1. Please confirm Figure 21 includes data for the years 2010 to 2014.
2. Please confirm Figure 21 excludes Loss of Supply.
3. Please provide the 5 year SAIDI and SAIFI averages excluding Loss of Supply, Major Event Days and Scheduled Outages for the years 2011 to 2015.
4. Please explain how new reliability targets will be set and evaluated for LDC Co.
5. Please provide LDC Co’s forecast reliability targets.

**AMPCO-13**

Ref: Exhibit B, Tab 5, Schedule 3, Page 1, Figure 23

1. Please provide the OM&A Cost per Customer for the years 2015 to 2025.

**AMPCO-14**

Ref: Exhibit B, Tab 5, Schedule 5, Page 7 Performance Targets

1. Please provide the current performance targets of Enersource, Horizon, PowerStream and Hydro One Brampton that are not included in the OEB Annual Scorecard.

**AMPCO-15**
Ref 1: Exhibit B, Tab 6, Schedule 5, Page 1

Preamble: At reference 1, the evidence states “The financial plan has been modelled on the basis that the ongoing sustainment and growth requirements of the electricity distribution system are provided for in a manner consistent with the long-term forecasts of the entities comprising LDC Co. Each entity has long-term capital plans based on detailed asset condition assessments, growth estimates, and sound engineering principles

1. Please complete the following Table regarding the current condition assessment of system assets:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **LDC** |  Total # of Assets | % of Assets At or Beyond Typical Useful Life | % of Assets in Poor or Very Poor Condition | % of Assets in Fair Condition |
| Enersource |  |  |  |  |
| Horizon |  |  |  |  |
| PowerStream |  |  |  |  |
| Hydro One Brampton |  |  |  |  |

**AMPCO-16**

Ref: Attachment 2, Financial Summary, Slide 6

1. Please confirm the timeframe of lower ongoing capital expenditure requirements and resulting lower rate base.

**AMPCO-17**

Ref: Attachment 11, Markham, Resolution of Council Meeting dated November 19 and 20, 2015

1. Please provide a copy of the report titled “PowerStream Merger” with recommendations updated on November 19, 2015.

**AMPCO-18**

Ref: Attachment 11, City of Vaughan, Extract from Special Council Meeting Minutes of October 7, 2015, Page 19

1. Please provide a copy of the four attachments listed.

**AMPCO-19**
Ref: Exhibit B, Tab 2, Schedule 1

Preamble: The evidence indicates a larger utility will have an expanded ability to monitor, report and improve system reliability and power quality.

1. Power quality is an important issue for AMPCO. Please explain further how system power quality will be monitored and improved for customers under LDC Co.

**AMPCO-20**
Ref: Attachment 2, Page 2

1. One of the key assumptions in the Financial Summary is that LDC Co. may apply for ICM in each year. For the charts on Pages 6, 7, 8 and 9, please provide the assumptions regarding an ICM by year.

**AMPCO-21**
Ref: Attachment 2, Page 12

1. With respect to the analysis regarding sensitivity to achieved synergies, has any analysis been undertaken where achieved synergies are greater than 100%? (i.e. 125% synergies) If not, why not?.

**AMPCO-22**
Ref: Attachment 9, Page 30 (33) Condition of Assets

1. Please provide the asset categories covered under PowerStream Realty Interests, Enersource Hydro Realty Interests, and Horizon Realty Interests.