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August 12, 2016

BY EMAIL & BY COURIER

Ms. Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge St, Suite 2701 Toronto ON M4P 1E4

Dear Ms. Walli:

Board File No. EB-2016-0160

Hydro One Networks Inc. --- 2017- 2018 COS Transmission Rates
Energy Probe – Interrogatories to Applicant

Pursuant to Procedural Order No. 1, issued July 29, 2016, in respect of Hydro One Networks Inc., please find attached the Interrogatories of Energy Probe Research Foundation (Energy Probe) in the EB-2016-0160 proceeding.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh Case Manager

Case Manager

Swidt he that

cc. David Barr, Hydro One Networks Inc. (By email)
Oded Hubert, Hydro One Networks Inc. (By email)
Erin Henderson, Hydro One Networks Inc. (By email)
Gordon M. Nettleton, McCarthy Tétrault LLP (By email)
Roger Higgin, Consultant to Energy Probe (By email)
Brady Yauch, Consultant to Energy Probe (By email)
Parties of Interest (By email)

# EB-2016-0160

# **ONTARIO ENERGY BOARD**

IN THE MATTER OF the Ontario Energy Board Act, 1998 ("Act");

AND IN THE MATTER OF an Application by Hydro One Networks Inc. for an order or orders made pursuant to section 78 of the Act approving rates for the transmission of electricity.

# **Interrogatories**

# **Energy Probe Research Foundation**

August 12, 2016

# EB-2016-0160 Hydro One Transmission; Rates 2017-2018 Interrogatories from Energy Probe Research Foundation

<u>Note to Reader</u>. Energy Probe has structured its Interrogatories based on the Filing Requirements and Pre-filed Evidence, rather than the Draft Issues List.

**Energy Probe IR #1** 

Ref.: Exhibit A, Tab 3, Schedule 1, page 5

Preamble: "Between 2009 and 2012, Hydro One invested heavily in system development, in order to comply with government policies related to the connection and integration of renewable energy generation and the retirement of coal-fired generation. Since then, system development needs have declined while system renewal needs have increased to the point of creating risk to current reliability levels."

Can Hydro One list the percentage of its capital spending between 2009 and 2012 that was directly related to government policies regarding the "connection and integration of renewable energy generation and the retirement of coal-fired generation"?

**Energy Probe IR #2** 

#### RELIABILITY RISK

Ref.: Exhibit A, Tab 3, Schedule 1, Pages 6/7, Table 2

- a) Please provide a version of Table 2 that shows a different "pacing" of the Capital Program than the Application:
  - -Reliability Risk is decreased over a period of three years rather than the proposed two years
  - -Reliability Risk is decreased over a period of five years rather than the proposed two years.
- b) What is the endpoint/long-term goal that Hydro One seeks to attain? Please provide this for the overall TX system and for each category of asset. How many years will this take?

Ref.: Exhibit A, Tab 3, Schedule 1, page 12

Preamble: "Due to the planned refurbishment of large nuclear power plants in 2021 and beyond, Hydro One expects to face greater constraints to outage scheduling in the future. As a result, it has planned the pace of sustainment work so that critical work to reduce risk on the system could be completed in the next five years to ensure that transmission assets are in service before expected outage constraints make work more difficult to complete."

Does Hydro One have any official plans or documents detailing its scheduled capital investments in the face of a delayed refurbishment schedule? Please provide copies.

**Energy Probe IR #4** 

#### LOAD FORECAST SUMMARY

Ref.: Exhibit A, Tab 3, Schedule 1, Page 9, Table 4; Exhibit E2, Tab 2, Schedule 1

- a) Please provide a summary table that shows for 2011-2016, the forecast and actual load.
- b) Please provide a quantitative discussion of the main drivers for reductions in load.
- c) For 2017-18 please discuss in quantitative terms the basis for the forecast reductions in Ontario demand.
- d) With regard to the Load Forecast Model, please provide details of latest forecast and graphical presentation(s), plus showing errors/trends, plus a discussion on statistical error associated with the model.
- e) Discuss if there are structural changes or other factors that are resulting in increased forecast error.

**Energy Probe IR #5** 

Ref.: Exhibit B1, Tab 1, Schedule 2, page 5

Preamble: "Hydro One has mitigated the impact of the costs of the changed BES definition on its business by seeking and obtaining reduced compliance requirements for 111 BES elements from the IESO that are not considered material to the power system."

a) Can Hydro One list the cost savings of those exemptions?

b) Can Hydro One provide an estimate of how those exemptions will impact, if at all, its reliability metrics?

**Energy Probe IR #6** 

Ref.: Exhibit B1, Tab 1, Schedule 3, page 22

- a) The CEA numbers dropped the July 8, 2013 event for Hydro One from its reliability performance rankings.
- b) Did it do the same for other utilities that experienced similar events? Please Comment.

**Energy Probe IR #7** 

Ref.: Exhibit B1-2-2, attachment 1, page 26

Preamble: While Hydro One stated that for the average customers the transmission rate represents 10% of the bill, one customer estimated it to be close to 25%.

- a) Does Hydro One have any estimates on the percentage of transmission costs of the total bill for the different rate classes?
- b) Specifically for Toronto Hydro, please provide the Impacts for each rate class.

**Energy Probe IR #8** 

Ref.: Exhibit B1, Tab 2, Schedule 4, page 8, Table 1

- a) Can Hydro One calculate the "relative change in risk" if average investment in 2017 and 2018 increases by 2% annually?
- b) Can Hydro One calculate the "relative change in risk" if average investment in 2017 and 2018 increases by 3% annually?

**Energy Probe IR #9** 

Ref.: Exhibit B1, Tab 3, Schedule 1, page 1, table 1

Can Hydro One provide a table detailing the capital budget going back to 2006?

Ref.: Exhibit B1, Tab 3, Schedule 2, page 2

Can Hydro One breakout how much of Sustaining Capital spending is to "ensure compliance with regulatory, environmental and reliability standard"?

**Energy Probe IR #11** 

#### TRANSMISSION REGULATORY SCORECARD

Ref.: Exhibit B2Tab 1Schedule 1Page 24

Preamble: All measures are Benchmarkable, except

- Asset Management -In-Service Capital Additions as % of OEB Approved Plan
- Renewable Energy % on-time completion of renewables connection impact assessments
- Regional Infrastructure Regional Infrastructure Planning Progress % Deliverables met.
- a) Please explain why these measures are not benchmarkable (e.g. availability of data)?
- b) What metrics other than achievement/activity, have been considered for these measures?
- c) Please graph the Asset Management Measure showing: Plan ISA, Actual ISA and % of OEB Approved Plan 2011-2015.
- d) On the same chart show the estimate and projections for 2016 and the 2017/18 Test Years.

**Energy Probe IR # 12** 

# RELIABILITY AND COST EFFICIENCY METRICS

Ref.: Exhibit B2Tab 1Schedule 1Pages 18-20 Table 4 and Figures 5 and 6

a) Please Indicate the period when and areas where the RCE Metric has been/is used in the TX Business--is it used by NERC, FERC and other Regulators in the US and Canada? Please clarify and provide details.

- b) Why has HO now decided to use RCE for Regulatory reporting? Has the OEB approved use of the RCE as an appropriate Metric?
- c) How does the RCE Metric compare to other Metrics HO TX is now using, including those encompassed in the TX Scorecard.
- d) With regard to the RCE formula, why is Gross Assets used, rather than Net/Book Value of the TX Assets? Discuss why Assets placed in service many years ago will be lower in original cost than recent assets and why net assets (cost less accumulated depreciation) would not be an appropriate numerator. See Report Page 10 B2-1-1 in formulating your response.
- e) With regard to the TX Total Cost Benchmarking Study, are RCE Metrics provided for the peer group? If so, please provide references and a summary of the data.
- f) If not, please request the Consultants to provide the available RCE data and explanatory notes.
- g) In addition, regardless of the availability of RCE metrics, please request the Consultants to provide an expert opinion on the merits of RCE Metrics in conjunction with other TX Metrics.

### **RELIABILITY PERFORMANCE**

Ref.: Exhibit B2, Tab 2, Schedule 1, Page 20 of Report, Page 15 of Exhibit

Preamble: Using the TADS metrics, Hydro One's sustained outage frequency for the lower voltage lines (below 200kV) was the highest in the peer group (Figure 17). Even excluding worst performing circuits (Figure 18), Hydro One's sustained outage frequency for the lower voltage lines remains among the highest in the peer group.

- a) Should Hydro One have different Reliability Goals for lower voltage lines? Please discuss, including geographic/density considerations.
- b) Please provide the load and number of customers by type (direct, LDC etc,) supplied by low voltage lines.
- c) How much of the Capital Program relates to Lower Voltage lines and related Transformation?
- d) Should the data provided in the response indicate any change in priority for low voltage lines? Please discuss.

#### PROJECT MANAGEMENT PERFORMANCE

Ref.: Exhibit B2, Tab 2, Schedule 1, Pages 29-30 of Report

Preamble: Although the hourly cost of overtime, which is driven by negotiated labour contracts, was higher than the peer group (Figure 30), Hydro One's overtime usage, as a percent of total hours, was consistent with other companies in the peer group (Figure 31). However, under the existing labour agreements, it also means that additional hours begin at double-time pay, rather than time and a half.

Overtime cost for Hydro One was generally higher than the other reporting companies. Significant benefit can be realised by minimising overtime. Page 30 of Report.

- a) Please indicate the basis of the current overtime policy.
- b) Please provide the data showing overtime paid relative to the peer group (include explanations for normalizing data).
- c) Please indicate the Average Overtime in 2015 as a percentage of base pay for Union, Society and MCP employees.
- d) Please provide the Calculation of Total Overtime paid in 2015 and provide an alternative cost with time and half (except for statutory holidays).

**Energy Probe IR #15** 

#### SUMMARY OF EXPENDITURES OVERHEAD LINES

Ref.: Exhibit C1, Tab 2, Schedule 2, Page 50

Preamble: The overall planned expenditures for the overhead lines program in 2017 and 2018 are \$20.9 million and \$20.8 million, respectively. This represents an increase over the bridge and historic years, due to the need to conduct more condition assessment on deteriorating assets.

- a) Please provide the tangible outcomes related to reduction of premature failures that justifies the Program increase.
- b) Assuming that the use of activity indicators is NOT a good measure does HO agree that reduction of premature failures is the appropriate measure?
- c) How is HO measuring Benefit/Cost related to increased Preventative Expenditures? Please provide details and results.

#### COMMON CORPORATE FUNCTIONS AND SERVICES

Ref: Exhibit C1, Tab 3, Schedule 3, Table 2

Preamble: The increase in 2016 Corporate Management Costs and the 2017 to 2018 forecast costs stems from changes in compensation.

- a) Please provide complete details of the doubling of Corporate Management costs from 2016-2017/18.
- b) Specifically Provide details of changes in Compensation from Board approved 2015 for 2016 Bridge Year and 2017-18 Test Years.
- c) Please provide copies of Government and Board Approvals of the changes.

**Energy Probe IR #17** 

#### TREASURY INSURANCE COSTS

Ref.: Exhibit C1, Tab 3, Schedule 3, Table 4

- a) Please explain basis of premiums paid for Corporate Functions and Services.
- b) Please explain the reasons for the major increase starting in 2016 and continuing in the Test Years.

**Energy Probe IR # 18** 

#### **OUTSOURCING - INERGI LP**

Ref.: Exhibit C1, Tab 3, Schedule 2, Page 12 and Appendix B, Table 1

- a) With regard to former Hydro One Employees, have these been normalized in the INERGI work force, or are there still residual differences in compensation and benefits?
- b) Please provide the Calculations of the 2016 and 2017-18 ECA amounts.
- c) Please explain the ECA Changes from the previous contract and provide an illustrative example.

d) Other than the fact ECA is a negotiated item, please explain why it is fair and appropriate.

**Energy Probe IR #19** 

**OUTSOURCING - BGIS FEES** 

Ref.: Exhibit C1, Tab 3, Schedule 2, Page 6

- a) Please provide the Benchmarking that resulted in the BGI Contract.
- b) BGI Fees are subject to an economic cost adjustment using a government published index that reflects movements in a broad-based consumer-focused price index. Please provide a breakdown of BGIS fees, including details of escalation factor.
- c) What performance factors are included in the BGIS contract? Please provide a copy of these.

**Energy Probe IR # 20** 

## CORPORATE STAFFING AND COMPENSATION

Ref.: Exhibit C1, Tab 4, Schedule 1, Figure 6

- a) Provide a copy of the chart with incumbent employees by category by month, rather than % of total workforce.
- b) Please provide a chart with employees by category YTD 2016 and projection for rest of year.
- c) Please provide projection of Total Employees by category for 2017 and 2018 listing all relevant assumptions

**Energy Probe IR #21** 

#### APPRENTICE HIRING

Ref.: Exhibit C1, Tab 4, Schedule 1, Table 1

a) Given the workforce profile and projected planned retirements, explain why Hydro One is not significantly increasing hiring of apprentices.

b) Please provide the current sourcing for Apprentices, including Community Colleges.

**Energy Probe IR #22** 

#### MCP COMPENSATION

Ref.: Exhibit C1, Tab 4, Schedule 1, Page 17

Preamble: Hydro One engaged Willis Towers Watson to undertake competitive market assessments and sought advice from Hugessen Consulting to determine the basis for the components of a new management compensation program.

Please provide a copy of the Towers Watson Report and the Advice provided by Hugessen Consulting.

**Energy Probe IR # 23** 

#### COMPETITIVE MARKET ASSESSMENTS

Ref.: Exhibit C1, Tab 4, Schedule 1, Pages 17/18

Preamble: To recruit a new Chief Executive Officer ("CEO") and Chief Financial Officer ("CFO"), Hugessen Consulting provided advice to the Hydro One Board on an appropriate compensation framework and more broadly, to provide advice on a new compensation structure to be established in 2016.

- a) Please provide the Hugesson Consulting Report.
- b) Please provide the Recommendations made to the Government and the Hydro One Board based on the Report.
- c) Please provide the Total Compensation breakdown for the CEO and CFO for 2016 and projected for 2017-2018; list all relevant assumptions related to the projections.
- d) Compare the Compensation for the New Positions to the Compensation provided in 2014 and 2015 for similar positions. Indicate the basis of the current and former comparisons used to establish compensation.

Ref.: Exhibit C1, Tab 4, Schedule 1, Pages 18/19

Preamble: Willis Towers Watson conducted market assessments for MCP Bands 3-10 (SVP to Administration roles). Executive level (Bands 3-4) compensation was assessed against a peer group consisting of twenty-one companies that included utilities and other Canadian publicly traded companies.

- a) Please provide the Willis Towers Watson Report for Executive Level bands.
- b) How does the methodology compare to the Hay Points system used by the IESO? Please provide a Side by Side comparison.
- c) Please provide the Recommendations made to the Hydro One Board based on the Report.
- d) Please provide the Total Compensation breakdown for the Executive Level for 2016 and projected for 2017-2018. List all relevant assumptions related to the projections.

### **Energy Probe IR #25**

Ref.: Exhibit C1, Tab 4, Schedule 1, Pages 18/19

Preamble: Non-executive level (Bands 5-10) compensation was assessed by segmenting these roles into Core Operations and Support Services.

- a) If not included in the Report in the previous request, please provide the Willis Towers Watson Report for non-executive bands.
- b) Please provide the Recommendations made to the Hydro One Board based on the Report and the minute approving the recommendations.
- c) Please provide the Total Compensation breakdown for the Non-executive level (Bands 5-10) for 2016 and projected for 2017-2018; list all relevant assumptions related to the projections.

**EMPLOYEE SHARE OWNERSHIP PLAN (ESOP)** 

Ref.: Exhibit C1, Tab 4, Schedule 1, Page 21

Preamble: MCP employees are eligible to participate in an ESOP. MCP employees can contribute up to 6% of their base salary and Hydro One will provide a 50% match on contributions to a maximum of 3% of base salary.

- a) Clarify the terms under which Executives participate in the ESOP (as opposed to MCP as described in Section 10.5).
- b) Given the addition of the ESOP, what reductions in MCP and Executive Base Pay have been made as an offset to balance the additional potential future compensation from ESOP?
- c) Alternatively, explain why incremental Compensation above Base Compensation and Incentive-Based pay (in the form of ESOP) is being provided and why ratepayers rather than shareholders should pay this cost.

**Energy Probe IR #27** 

SHARE GRANTS – PWU AND SOCIETY

Ref.: Exhibit C1, Tab 4, Schedule 1, Pages 24/25

- a) Please provide documentation that sets out the exact terms of the share grants.
- b) If not included, please provide details of exercise rights and price relative to market.
- c) Are Employees allowed to sell or trade their Options? Please clarify and provide supporting rationale(s).

**Energy Probe IR # 28** 

**COMPENSATION COSTS** 

Ref.: Exhibit C1, Tab 4, Schedule 1, Page 26, Figure 7

- a) Confirm Figure 7 is compensation for the Total Hydro One Dx and Tx.
- b) Clarify/list what elements of Total compensation are included in Figure 7. Specifically, are average Incentive Pay, ESOP and Share Grants included?

- c) If not, please correct Figure 7 to include <u>all</u> elements of Total Compensation and provide the necessary assumptions and caveats.
- d) Please provide the revised chart that shows only Regular staff costs and total cost from \$500 million to 900 million (and add note that casual staff makes the difference).

#### **PAYROLL TABLES**

Ref.: Exhibit C1, Tab 4, Schedule 1, Attachment 1, Pages 1-6

- a) Please provide a copy of the Payroll Tables that includes Executive Compensation with revised Totals.
- b) For 2017 and 2018 as applicable, include columns that show additional compensation costs, such as ESOP and Share Grants.

**Energy Probe IR #30** 

#### TOTAL COMPENSATION STUDIES

Ref.: Exhibit C1, Tab 4, Schedule 1, Page 26/27

Preamble: As directed by the OEB, Hydro One will perform an updated compensation study for submission with the next Distribution Rate Application, expected to be filed in the first quarter of 2017.

- a) Please provide a copy of the OEB Direction.
- b) Please explain why Hydro One has not updated the 2013 Mercer Study for this application given that 3 years have elapsed.
- c) Please indicate the Status of the new Mercer Compensation study and the schedule for completion.
- d) Please explain why an update to the study is not essential, given the material changes to total compensation following the privatization of Hydro One. (examples Defined Contribution Pension Plan, ESOP and Share Grants).
- e) Please explain why 3 year old data from the former Crown Corporation is adequate to assess Hydro One's Total Compensation (Dx and Tx) for the period 2016-2018?

#### PENSION COSTS

Ref.: Exhibit C1, Tab 4, Schedule 1, Page 34

- a) As shown in Figure 3, MCP Pension costs have not moved towards the Cost Ratio target as quickly as other employee groups. Please explain why this is the case, since HO Directly controls pay and benefits for these ~590 employees.
- b) What is the additional annual cost relative to a 50: 50 sharing?

**Energy Probe IR #32** 

## COMMON CORPORATE COSTS, COST ALLOCATION METHODOLOGY

Ref.: Exhibit C1, Tab 6, Schedule 1, Pages ¾, Tables 1 and 2 and Exhibit C1, Tab 6, Schedule 1, Table 4

Preamble: The Black and Veatch Report BP2017-18 Table 4, shows Common costs of \$325 million. Tables 1 and 2 show ~\$204 million.

Please indicate the differences and Map these to provide reconciliation between the Exhibits.

**Energy Probe IR #33** 

#### DEPRECIATION AND AMORTIZATION EXPENSES

Ref.: Exhibit C1, Tab 7, Schedule 1, Page 1, Table 1

Preamble: In accordance with the Board's Decision (EB-2012-0031), Hydro One Transmission used the Foster methodology, updated to reflect the results from the new Depreciation Study completed in 2016 for determining the depreciation rates proposed to be used in the calculation of depreciation expenses for 2017 and 2018.

- a) Please explain, provide more detail on the doubling of asset removal costs in the Test years.
- b) Specifically, provide a breakout of the coats for each major class of assets.
- c) Please provide a projection of asset removal costs by class over the period 2017-2021 and provide a discussion on the need/drivers

Ref.: Exhibit D1, Tab 1, Schedule 1, page 5

Can Hydro One provide a table showing Board Approved and Actual rate base going back to 2011?

**Energy Probe IR #35** 

**IN-SERVICE ADDITIONS** 

Ref.: Exhibit D1, Tab 1, Schedule 1 and Table 1, ISAs

- a) Please provide in tabular form, the variation in ISAs (Forecast and Actual) for the historic period 2011-2015.
- b) Given the <u>historic</u> major variations in ISAs, please provide a Table showing the impacts expressed as percentage of plan and \$ amount plus the impact on the Rate Base and annual revenue requirements.
- c) Please provide the current status for 2016, expressed in % variation \$ and associated impact on Rate Base and Revenue Requirement
- d) Please discuss why post facto explanations for material differences in ISAs are appropriate and useful in the regulatory process?
- e) Please provide the impact of a  $\pm 10\%$  and  $\pm 20\%$  variation in ISAs on the 2017 and 2018 forecast Rate Base and Revenue Requirements.
- f) Based on the previous responses, please discuss why Rates should include the revenue requirements for costs of assets that materially differ from approved Capital plan.
- g) Please discuss how variations in ISAs can/should be addressed in reference to the objectives of the RRFE for Transmitters and in particular, under any Incentive Regulation Plan.

**Energy Probe IR # 36** 

ECONOMIC EVALUATION TRUE-UPS

Ref.: Exhibit D1Tab 1Schedule 3 Table 1

a) Have 2015 True-ups for 2015 been completed? What is the Impact on the Revenue requirement for the Test Years?

- b) Is the forecast of true-ups for 2016 on track and what will be the impact on the 2017/18 Revenue Requirements?
- c) What adjustments have been made to the Load Forecast for the Test Years? Please provide details.

# COST OF CAPITAL RETURN ON COMMON EQUITY

Ref: Exhibit D1, Tab 4, Schedule 1 and EB-2016-0050 Exhibit I, Tab 2, Schedule 41, EP IRR #4b

Preamble: Hydro One Transmission's evidence reflects a return of 9.19% for the test years 2017 and 2018, based on the Cost of Capital Parameters released by the OEB on October 15, 2015, for rates effective January 1, 2016. Specifically, for 2017, the Board would determine the ROE: 1 - for Hydro One Transmission, 2 - based on the September 2016 Consensus Forecasts and Bank of Canada data which, 3 - would be available in October 2016.

- a) Please Provide the Historic ROE for Hydro One and the ROE for the Transmission Business.
- b) In your response, please review the IRR provided in the second Reference and clarify if the values relate to Hydro One or specifically to the Transmission Business:

	2010	2011	2012	2013	2014	2015
Hydro One Revenue Requirement (\$M)	1.217.7	1,299.5	1,385.1	1.390.8	1,446.4	1.477.3
Hydro One Realized Return on Equity (%)	10.49	10.95	12.41	13.22	13.12	10.93

- c) Based on the responses above, please provide a Table and a chart that shows for the Transmission Business, the Revenue Requirement and allowed and actual ROE for each of the historic years.
- d) Please discuss the reasons for any material over-earning.

# **COST OF CAPITAL COMMON EQUITY**

Ref.: Exhibit D2, Tab 4, Schedule 1, Page 1; Exhibit D2, Tab 4, Schedule 2

- a) In the first reference, please provide the Average Rate Base corresponding to the Equity amount (Line 4).
- b) Please confirm Calculated Equity (Line 4) is Board Approved Amount. If not, explain the difference(s).
- c) Please explain why equity amount decreased over the period 2013-2016.
- d) Please provide the calculation and explain why Equity (Line 5) increases 2016-2017.

**Energy Probe IR #39** 

#### RATES FOR EXPORT TRANSMISSION SERVICE

Ref.: Exhibit H1, Tab 4, Schedule 1

Preamble: Hydro One Transmission proposes to maintain the currently settled value of \$1.85/MWh for ETS through the 2017 and 2018 period. For 2017 and 2018, the ETS revenue will continue to be disbursed through a decrease in the revenue requirement for the Network rate pool, as per the cost allocation process approved by the Board.

- a) Please provide details of the methodology and results of the forecast Export Volumes and ETS revenue of \$39.2 million and \$40.1 million per year for 2017 and 2018, respectively.
- b) Please provide the Forecast ETS Volumes and Revenue for the Period 2011-2015 and note the approved Rate for each year.
- c) For 2016, provide the forecast and Estimate based on YTD data.