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BY E-MAIL

December 28, 2016

Gregory Beharriell,
Manager, Regulatory Affairs
Canadian Niagara Power Inc.
1130 Bertie Street
P.O. Box 1218
Fort Erie ON L2A 5Y2

Dear Mr. Beharriell:

RE: Canadian Niagara Power Inc. Application for Distribution Rates – EB-2016-0061

In a number of recent Ontario Energy Board (“OEB”) hearings, the OEB has expressed its desire that, where possible, intervenors forward questions to the applicant that would likely require an undertaking to provide a response during the oral hearing. This provides the applicant the opportunity to provide the response at the oral hearing rather than requiring an undertaking. This allows intervenors and the Board the opportunity to review the responses during the hearing, rather than following the conclusion of the oral hearing. In such cases there is no opportunity to follow up on the responses provided if any issues arise from the undertaking responses.

On behalf of Energy Probe, I have a number of questions/requests that would likely result in undertakings if they were first asked during cross examination. Provision of the responses during the hearing will likely reduce the time of my cross examination.

The questions/requests are as follows:

1. Assuming that CNPI does not have actual OM&A costs for the full 12 months of the 2016 bridge year, please update the response to 4-Energy Probe-14, part (b) to reflect actual year-to-date November information for both 2015 and 2016. If CNPI does have actual OM&A expenses for the entire year, this update is not required, as it is covered off in the next question.
2. Please update the response to 4-Energy Probe-14, part (c) to reflect either actual OM&A expenses for all of 2016, if available, or, if not available, the forecast of the 2016 figure based on the year-to-date actual figures for November and the current estimate for the OM&A expenses for December.

3. The cost driver table shown as Table 4.2.2.1 of Exhibit 4, Tab 2, Schedule 2 shows an increase of \$150,000 in 2016 for the pole testing program. Please provide the actual expense incurred in 2016 (or forecast to be incurred in 2016 based on year-to-date actuals for November and an estimate for December) for the pole testing program. Please break down this amount into the two components of the cost noted at page 7 of Exhibit 4, Tab 2, Schedule 2, namely the inspection and testing program, and pole repairs.
4. Please provide the actual costs incurred for each of 2012 through 2015 and for 2016 based on year-to-date actuals for November and the estimate for December if complete 2016 actuals are not yet available, for vegetation management.
5. Please provide an updated Appendix 2-L, updated to reflect actual 2016 figures (or forecasts based on year-to-date November actuals and the current estimate for December) of OM&A expense, number of customers and FTE's.

Yours Truly,

Randy Aiken

Randy Aiken
Aiken & Associates

cc. Scott Hawkes, CNPI
Andrew Taylor, Energy Boutique
Martin Davies, OEB
Ljuba Djurdjevic, OEB
Intervenors