

SCHOOL ENERGY COALITION

**CROSS-EXAMINATION
MATERIALS**

EB-2016-0085

InnPower – Both Panels



Revenue Requirement Workform (RRWF) for 2017 Filers

Revenue Deficiency/Sufficiency

Line No.	Particulars	Initial Application		Technical Conference		Per Board Decision	
		At Current Approved Rates	At Proposed Rates	At Current Approved Rates	At Proposed Rates	At Current Approved Rates	At Proposed Rates
1	Revenue Deficiency from Below		\$2,436,466		\$2,626,876		\$2,626,876
2	Distribution Revenue	\$8,471,470	\$8,471,470	\$8,328,277	\$8,328,277	\$8,328,277	\$8,327,469
3	Other Operating Revenue Offsets - net	\$1,107,121	\$1,107,121	\$975,758	\$975,758	\$975,758	\$975,758
4	Total Revenue	\$9,578,591	\$12,015,057	\$9,304,035	\$11,930,910	\$9,304,035	\$11,930,103
5	Operating Expenses	\$8,800,675	\$8,800,675	\$8,800,675	\$8,800,675	\$8,800,675	\$8,800,675
6	Deemed Interest Expense	\$1,168,866	\$1,168,866	\$1,099,244	\$1,099,244	\$1,099,244	\$1,099,244
8	Total Cost and Expenses	\$9,969,540	\$9,969,540	\$9,899,918	\$9,899,918	\$9,899,918	\$9,899,918
9	Utility Income Before Income Taxes	(\$390,949)	\$2,045,516	(\$595,884)	\$2,030,992	(\$595,884)	\$2,030,184
10	Tax Adjustments to Accounting Income per 2013 PILs model	(\$1,519,555)	(\$1,519,555)	(\$1,406,651)	(\$1,406,651)	(\$1,406,651)	(\$1,406,651)
11	Taxable Income	(\$1,910,504)	\$525,962	(\$2,002,535)	\$624,341	(\$2,002,535)	\$623,533
12	Income Tax Rate	26.50%	26.50%	26.50%	26.50%	26.50%	26.50%
13	Income Tax on Taxable Income	(\$506,284)	\$139,380	(\$530,672)	\$165,450	(\$530,672)	\$165,236
14	Income Tax Credits	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
15	Utility Net Income	\$115,334	\$1,906,137	(\$65,212)	\$1,865,542	(\$65,212)	\$1,864,883
16	Utility Rate Base	\$54,274,959	\$54,274,959	\$53,119,071	\$53,119,071	\$53,119,071	\$53,119,071
17	Deemed Equity Portion of Rate Base	\$21,709,984	\$21,709,984	\$21,247,628	\$21,247,628	\$21,247,628	\$21,247,628
18	Income/(Equity Portion of Rate Base)	0.53%	8.78%	-0.31%	8.78%	-0.31%	8.78%
19	Target Return - Equity on Rate Base	8.78%	8.78%	8.78%	8.78%	8.78%	8.78%
20	Deficiency/Sufficiency in Return on Equity	-8.25%	0.00%	-9.09%	0.00%	-9.09%	0.00%
21	Indicated Rate of Return	2.37%	5.67%	1.95%	5.58%	1.95%	5.58%
22	Requested Rate of Return on Rate Base	5.67%	5.67%	5.58%	5.58%	5.58%	5.58%
23	Deficiency/Sufficiency in Rate of Return	-3.30%	0.00%	-3.63%	0.00%	-3.63%	0.00%
24	Target Return on Equity	\$1,906,137	\$1,906,137	\$1,865,542	\$1,865,542	\$1,865,542	\$1,865,542
25	Revenue Deficiency/(Sufficiency)	\$1,790,802	\$ -	\$1,930,754	\$ -	\$1,930,754	(\$658)
26	Gross Revenue Deficiency/(Sufficiency)	\$2,436,466 ⁽¹⁾		\$2,626,876 ⁽¹⁾		\$2,626,876 ⁽¹⁾	

Notes:

⁽¹⁾ Revenue Deficiency/Sufficiency divided by (1 - Tax Rate)

1 January 2015. His predecessor was vice-president of
2 customer services for InnPower for over 20 years.

3 Our vice-president of engineering and operations
4 started in his role in August of 2015. His direct report,
5 Mr. Davidson, started as engineering manager in March of
6 2017.

7 And finally, Ms. Cowles was appointed by me as interim
8 CFO treasurer for InnPower Corporation in January of 2017.

9 I'm making this known to the OEB Staff and to the
10 intervenors, not as an excuse of the past performance of
11 InnPower, but to demonstrate the changeover that has
12 happened in InnPower over time.

13 The past is the past. We don't dwell on the past, but
14 we do learn from that past. In our commitment as an
15 executive team, a new executive team at InnPower, is to
16 make sure that the performance of this utility is
17 increased.

18 One of the directions that we did as an executive team
19 and under my leadership was following the community day
20 that was held by the Ontario Energy Board in March, was to
21 direct staff to go back to the cost-of-service application
22 and make changes based on the feedback that we received on
23 community day. Mr. Shepherd was part of that community day
24 for the two sessions and we thank him for his participation
25 in that session.

26 Finally, I'd like to state that we look forward to
27 working with the OEB Staff and the intervenors today as we
28 move forward in this technical conference.

1 MR. MALCOLM: InnPower takes full ownership of what
2 our customers feel. We take their concerns seriously, and
3 we take ownership of it.

4 We have a new executive team. We are not going to
5 hide from that. We recognize that there's been issues in
6 the past.

7 When I started in this role, I knew there was big
8 challenges in InnPower. My role and responsibility, and
9 that of my executive team, is to listen to our customers,
10 delve into those areas, and make sure that we make the
11 improvements that they're looking for.

12 MR. SHEPHERD: All right. Let me ask you about your
13 rates. I think the reference here is 1-SEC-31. I've sent
14 the table that is referred to in this interrogatory to your
15 counsel, so that it can be put up on the screen.

16 MR. VELLONE: Which of the two documents? Sorry.

17 MR. SHEPHERD: This is the list of rates, the rate
18 comparison.

19 MR. VELLONE: I'm just going to confirm that my
20 clients have seen this table before. I believe it was
21 filed as part of the interrogatory responses.

22 MR. SHEPHERD: They responded on it.

23 MR. VELLONE: I just want to make sure.

24 MS. PINKE: Yes.

25 MR. SHEPHERD: Now, in your original custom IR
26 application, your rates -- you were proposing a much bigger
27 increase in your rates than you are today, right?

28 MS. PINKE: Yes, we were.

1 MR. SHEPHERD: So we asked you why did you get such a
2 strong negative response, and I'm looking at the answer and
3 it looks like you're saying really, it wasn't our fault.
4 Really, they are not actually angry at us; they are
5 actually angry at government policy and things like that,
6 and not really at us. Am I reading that wrong?

7 MR. MALCOLM: The customers at our community day were
8 upset at the whole electricity industry. They brought up
9 concerns about the provincial government. They brought up
10 concerns about the high cost of the commodity rates.

11 They brought up the cost of our building. They
12 brought up the cost of our sculpture in front of our
13 building. They brought up the fact that our distribution
14 rates, which was published in the Financial Post, as being
15 high.

16 So they were, in general, upset about the whole
17 industry. They were also upset and what really -- when I
18 talked to the customers one-on-one, the Ontario Energy
19 Board with the community day sent out a notice just prior
20 to the community day, and it just happened around the same
21 time as the provincial government announced the Fair Hydro
22 Plan about cutting hydro rates 25 percent.

23 So once the provincial government -- so Premier Wynne
24 came to Barrie, and on CTV Barrie announced this is what
25 her government is planning on doing.

26 Following that, we are having an OEB community day and
27 notices are going out to our customers saying that our
28 rates are going up. So the interpretation from our

1 percent to 105 percent within my area.

2 MR. SHEPHERD: Yeah, my question is about favourable
3 performance.

4 This appears to say that most management employees in
5 2016 were assessed to have favourable performance.

6 MR. MALCOLM: So each employee goes through a
7 performance evaluation. They have goals and objectives set
8 up at the beginning of the year. They are monitored during
9 the course of the year. Once they achieve those results,
10 they are eligible for an increase between 100 and 105
11 percent.

12 MR. SHEPHERD: That wasn't my question. My question
13 was actually much simpler than that. Did most management
14 employees in 2016 have an assessment of favourable
15 performance?

16 MR. MALCOLM: As I stated, the ones that achieved it,
17 achieved their performance benchmarks, did achieve the
18 incentive. But we had management employees that are not at
19 the 100 percent.

20 MR. SHEPHERD: We're missing each other. It doesn't
21 matter whether they are at the 100 percent. Their
22 performance -- if they have favourable performance, they
23 get a salary increase, right?

24 MR. MALCOLM: Regardless of were they in the band,
25 yes.

26 MR. SHEPHERD: Yes. So did most management employees
27 get a favourable performance review and get a salary
28 increase, yes or no?

UNDERTAKING JT1.8

Undertaking:

IN OM&A, WHAT ARE THE INCREMENTAL COSTS AT BEING IN THE NEW BUILDING VS COSTS AT THE OLD BUILDING USING ACTUAL 2014-2016 AND FORECAST 2017 DATA.

Reference: Transcript dated September 12, 2017 page 59, line 9 to page 60, line 21.

Response:

The incremental OM&A costs at being in the new building vs. costs at the old building using actual 2014-2016 data are shown in the table below.

Table JT1.8 Building Expenses – 7251 Yonge Street vs 2073 Commerce Park Drive

Building Expenses - 7251 Yonge Street vs. 2073 Commerce Park Drive										
	New Building			Old Building			2017 to 2014 Variance	2016 to 2014 Variance		
	2017	2016	2015	2016	2015	2014				
Property Taxes	102,000.00	101,489.21	86,203.70		14,861.93	20,127.75	\$ 81,872.25		\$ 81,361.46	
Insurance	56,000.00	55,208.16	43,942.58			36,678.00	\$ 19,322.00		\$ 18,530.16	
Hydro/Water/Sewer	55,000.00	55,577.75	44,704.58		17,117.87	38,034.25	\$ 16,965.75		\$ 17,543.50	
Gas	10,000.00	9,914.03	12,560.68			-	\$ 10,000.00		\$ 9,914.03	
Security	1,044.00	1,044.00	1,044.00			1,044.50	-\$ 0.50		-\$ 0.50	
Janitorial	22,500.00	22,500.00	25,477.94		813.48	14,100.00	\$ 8,400.00		\$ 8,400.00	
Snow Plowing	11,000.00	10,499.72	9,609.42			13,111.90	-\$ 2,111.90		-\$ 2,612.18	
Grass Cutting	420.00	420.00	420.00			480.00	-\$ 60.00		-\$ 60.00	
Phone/Internet	32,000.00	32,124.91	25,706.25	18,480.00	-	33,042.75	-\$ 1,042.75		-\$ 917.84	
Miscellaneous	22,000.00	21,801.22	2,658.94		2,456.54	16,630.93	\$ 5,369.07		\$ 5,170.29	
	\$ 311,964.00	\$ 310,578.99	\$ 252,328.09	\$ 18,480.00	\$ 35,249.82	\$ 173,250.08	\$ 138,713.92		\$ 137,328.91	
Net Incremental Costs at 7251 Yonge Street Vs 2073 Commerce Park Drive (\$)									\$ 138,713.92	
1. \$101194.25 or 73% of the incremental cost of the new building for maintenance is directly attributable to the increase in property tax and insurance. 2. Hydro/Water/Sewer have increased due to waste water as 2061 Commerce was on septic 3. The cost per Sq Ft for maintenance expense in the new building is \$7.46 for 2017 expences (311,964 /41,800 sq ft) 4. The cost per Sq Ft for the maintenance expense at the old building site was \$21.32 (173,250/8,128 sq ft)										
Notes:										
1 All expenses exclude tax, except for hydro expenses										
2 Insurance is property only.										
3 Old building heated by electric, new building gas.										
4 Old building was on septic, new building has sewer included in new rates.										
5 Internet at old building still exists for old building for communication network										

Witness: Brenda Pinke

1 MR. MALCOLM: Yes.

2 MR. SHEPHERD: Thank you.

3 MS. O'CONNELL: Can you clarify that the same type of
4 incentives and salary adjustments are not available to the
5 unionized employees?

6 MS. COWLES: That's correct, they don't have the same
7 management performance measurements.

8 MS. O'CONNELL: Are there any additional on top of
9 that, or no?

10 MS. COWLES: Any additional incentive programs?

11 MS. O'CONNELL: Any additional types of compensation
12 for the union employees?

13 MS. COWLES: Just the union negotiated increase.

14 MS. O'CONNELL: Okay, thank you. I wanted to ask you
15 -- sorry, back to the management. You've said that they
16 have received a cost of living adjustment ranging from
17 2 percent to 2.7 percent. What cost of living adjustment
18 is forecasted for the 2017 test year?

19 MR. MALCOLM: The amount was 2 percent.

20 MS. O'CONNELL: Okay. Thank you. Was the management
21 incentive program that was introduced in 2015 included as
22 evidence in the 2013 process service proceeding?

23 MS. PINKE: No, it was not included in the previous
24 rate application.

25 MS. O'CONNELL: My next question is 4.0 Staff 49, page
26 163. Scroll up. Scroll up. Under the heading "New
27 corporate headquarters", the property tax is expected to
28 increase by over 100,000. I just wondered if you have a

UNDERTAKING JT2.1

Undertaking:

TO PROVIDE A LIST OF COST CHANGES RELATED TO THE NEW BUILDING AND TO EXPLAIN THEM.

Reference: Transcript dated September 13, 2017 page 50, line 19 to page 51 line 20.

Response:

Capital Comparison			
	7251 Young St		2073 Commerce Park DR
2014 Value in Ratebase			\$ 440,510
2015 Value in Ratebase	\$ 9,964,561		\$ -
Expense Comparison			
	7251 Young St		2073 Commerce Park DR
2014 Expense	0		\$ 173,250.08
2015 Expense	\$ 252,328.09		\$ -

Witness: Brenda Pinke

<i>Distributor</i>	<i>Benchmarking Results</i>						
	<i>2010</i>	<i>2011</i>	<i>2012</i>	<i>2013</i>	<i>2014</i>	<i>2015</i>	<i>3 Year</i>
Algoma Power	62.0%	68.1%	66.4%	69.1%	68.1%	70.6%	69.3%
Toronto Hydro	41.7%	47.7%	45.1%	48.4%	49.9%	51.5%	49.9%
West Coast Huron Energy	14.4%	16.0%	34.8%	41.4%	32.8%	33.5%	35.9%
Hydro One Networks	58.6%	57.3%	58.7%	27.6%	30.0%	20.3%	26.0%
Chapleau Public Utilities	17.5%	14.8%	24.0%	20.5%	27.7%	23.9%	24.0%
Woodstock Hydro	33.5%	32.9%	29.0%	25.9%	23.0%	19.5%	22.8%
PUC Distribution	-8.5%	-5.2%	13.4%	22.7%	14.6%	16.2%	17.8%
Festival Hydro	20.5%	18.0%	20.2%	19.6%	16.6%	14.0%	16.8%
Midland Power	16.4%	17.0%	19.6%	18.7%	15.2%	13.8%	15.9%
Wellington North Power	7.4%	18.0%	12.8%	17.7%	14.2%	11.8%	14.6%
Peterborough Distribution	14.0%	15.6%	13.2%	14.5%	14.5%	11.0%	13.3%
Canadian Niagara Power	16.4%	15.6%	10.0%	11.0%	12.9%	13.0%	12.3%
Renfrew Hydro	15.3%	18.3%	18.3%	15.7%	10.4%	10.6%	12.2%
Hydro Ottawa	-0.1%	-2.6%	7.8%	8.5%	12.7%	15.2%	12.1%
EnWin Utilities	17.8%	16.8%	23.9%	10.3%	10.9%	9.9%	10.3%
Waterloo North Hydro	-3.1%	6.4%	4.3%	10.6%	11.0%	8.2%	9.9%
Oakville Hydro	7.6%	12.4%	10.6%	13.8%	8.7%	6.9%	9.8%
Greater Sudbury Hydro	-2.4%	14.1%	16.7%	4.8%	14.9%	8.0%	9.3%
Thunder Bay Hydro	9.6%	8.0%	-2.8%	8.1%	7.4%	8.6%	8.0%
Tillsonburg Hydro	13.5%	10.7%	12.2%	19.5%	4.4%	-0.5%	7.8%
Erie Thames Powerlines	14.9%	14.4%	3.9%	7.9%	7.0%	7.0%	7.3%
North Bay Hydro	3.6%	5.5%	5.8%	5.4%	8.2%	7.0%	6.9%
Fort Frances Power	14.8%	10.5%	11.7%	6.4%	5.6%	5.1%	5.7%
PowerStream	-7.4%	-6.4%	1.2%	3.0%	5.6%	8.1%	5.6%
Atikokan Hydro	14.9%	7.7%	32.9%	10.3%	-4.9%	9.7%	5.0%
Niagara Peninsula Energy	5.4%	5.2%	10.2%	1.1%	7.7%	4.5%	4.5%
Norfolk Power	-1.8%	-2.6%	6.0%	1.2%	6.5%	NA	3.9%
Bluewater Power	-3.2%	1.7%	6.4%	5.9%	0.3%	0.8%	2.3%
Sioux Lookout Hydro	0.6%	-1.4%	7.2%	2.9%	6.2%	-4.3%	1.6%
Innpower	-7.1%	-6.2%	-2.4%	-2.8%	-2.8%	8.5%	1.0%
Kingston Hydro	0.1%	2.2%	2.4%	3.7%	-3.6%	-3.1%	-1.0%
Cambridge and North Dumfries	-10.1%	-7.8%	-3.3%	0.5%	-1.9%	-3.6%	-1.7%
Milton Hydro	-4.1%	-3.0%	-37.6%	-4.6%	-4.0%	2.7%	-2.0%
Veridian Connections	-4.7%	-4.5%	2.4%	-1.3%	-3.0%	-2.7%	-2.3%
Centre Wellington Hydro	-8.7%	-4.9%	0.4%	-3.2%	-3.1%	-1.2%	-2.5%
Guelph Hydro	12.4%	14.7%	-2.0%	0.8%	-4.8%	-3.8%	-2.6%
Westario Power	-3.1%	-0.2%	-1.4%	2.2%	-4.2%	-6.0%	-2.6%
Brantford Power	3.8%	-2.5%	4.7%	0.7%	-3.6%	-6.1%	-3.0%
Lakeland Power	na	na	-6.4%	-0.9%	-1.9%	-7.6%	-3.5%
Niagara-on-the-Lake Hydro	7.6%	6.5%	2.7%	-1.1%	-2.8%	-6.6%	-3.5%
Orangeville Hydro	-2.7%	1.6%	0.8%	0.1%	-4.0%	-7.6%	-3.8%
Brant County	15.6%	22.4%	11.5%	5.5%	-3.6%	-13.6%	-3.9%
Ottawa River Power	-2.9%	2.7%	0.0%	4.3%	-6.9%	-9.3%	-4.0%
Hydro One Brampton	-5.8%	-7.4%	-9.2%	-5.7%	-3.3%	-2.9%	-4.0%

Horizon Utilities	-13.0%	-13.7%	-6.9%	-5.5%	-5.3%	-2.1%	-4.3%
Whitby Hydro	0.4%	-3.0%	-7.0%	-5.7%	-6.8%	-2.6%	-5.0%
Orillia Power	-3.5%	-1.9%	-3.7%	-4.7%	-5.3%	-8.0%	-6.0%
Rideau St. Lawrence Distribution	-10.6%	-13.8%	-6.7%	-7.2%	-8.1%	-4.8%	-6.7%
St. Thomas Energy	-6.4%	-4.5%	6.8%	-4.6%	-6.3%	-10.3%	-7.1%
Hydro 2000	-14.8%	-12.2%	-0.8%	-1.0%	-15.3%	-6.2%	-7.5%
Kenora Hydro	-11.5%	-4.6%	-5.2%	-11.2%	-11.0%	-3.9%	-8.7%
Burlington Hydro	-7.6%	-7.1%	-9.0%	-7.5%	-9.4%	-10.3%	-9.0%
Enersource Hydro Mississauga	-9.5%	-16.1%	-9.5%	-10.7%	-13.9%	-8.2%	-11.0%
London Hydro	-16.8%	-10.1%	-11.1%	-11.0%	-12.8%	-9.9%	-11.3%
COLLUS PowerStream	-8.2%	-9.5%	-1.2%	-12.3%	-14.2%	-14.2%	-13.6%
Essex Powerlines	-17.0%	-17.1%	-12.6%	-17.2%	-12.7%	-13.5%	-14.5%
Lakefront Utilities	-14.7%	-12.5%	-18.7%	-7.4%	-16.0%	-22.1%	-15.2%
Entegrus Powerlines	-13.1%	-13.4%	-10.9%	-14.7%	-16.7%	-17.3%	-16.3%
Oshawa PUC	-21.7%	-18.0%	-14.5%	-17.4%	-18.1%	-14.9%	-16.8%
Grimsby Power	-23.1%	-18.6%	-9.6%	-16.9%	-17.3%	-17.0%	-17.0%
Welland Hydro	-19.6%	-16.2%	-10.4%	-15.2%	-17.3%	-18.7%	-17.0%
Newmarket-Tay Power	-14.6%	-21.0%	-19.5%	-19.5%	-18.6%	-19.3%	-19.1%
Kitchener-Wilmot Hydro	-22.9%	-22.8%	-20.7%	-19.3%	-19.0%	-22.3%	-20.2%
Hearst Power	-26.3%	-30.1%	-28.4%	-33.1%	-22.4%	-7.4%	-21.0%
Espanola Regional Hydro	-22.6%	-21.8%	-15.5%	-19.3%	-25.4%	-20.4%	-21.7%
Haldimand County Hydro	-27.6%	-24.1%	-18.7%	-23.7%	-23.6%	-21.4%	-22.9%
Cooperative Hydro Embrun	-19.3%	-16.9%	-26.4%	-18.7%	-29.7%	-33.2%	-27.2%
Halton Hills Hydro	-27.2%	-24.9%	-27.5%	-35.7%	-31.3%	-28.2%	-31.7%
Northern Ontario Wires	-38.5%	-35.7%	-25.8%	-25.1%	-32.6%	-42.2%	-33.3%
E.L.K. Energy	-28.2%	-26.2%	-25.4%	-33.2%	-44.9%	-34.7%	-37.6%
Wasaga Distribution	-46.8%	-46.3%	-37.8%	-41.6%	-41.6%	-45.6%	-42.9%
Hydro Hawkesbury	-61.8%	-59.4%	-55.8%	-51.1%	-64.3%	-68.1%	-61.2%

Summary of Cost Benchmarking Results

InnPower

	2015 (History)	2016 (Bridge)	2017 (Test Year)	2018	2019	2020
Cost Benchmarking Summary						
Actual Total Cost	14,265,653	14,914,065	15,298,952	na	na	na
Predicted Total Cost	13,098,824	13,611,579	13,978,643	na	na	na
Difference	1,166,829	1,302,486	1,320,308	na	na	na
Percentage Difference (Cost Performance)	8.5%	9.1%	9.0%	na	na	na
Three-Year Average Performance			8.9%	na	na	na
Stretch Factor Cohort						
Annual Result	3	3	3	na	na	na
Three Year Average			3			

**Appendix 2-L
 Recoverable OM&A Cost per Customer and per FTE ¹**

	Last Rebasing Year - 2013- Board Approved		Last Rebasing Year - 2013- Actual		2014 Actuals		2015 Actuals		2016 Bridge Year		2017 Test Year	
	CGAAP		CGAAP		MIFRS		MIFRS		MIFRS		MIFRS	
Reporting Basis												
OM&A Costs												
O&M	\$ 1,740,391	\$ 1,787,150	\$ 1,814,455	\$ 1,805,094	\$ 2,083,333	\$ 2,178,889						
Admin Expenses	\$ 3,149,801	\$ 3,208,053	\$ 3,410,196	\$ 3,752,497	\$ 3,605,481	\$ 3,811,467						
Total Recoverable OM&A from Appendix 2-JB ⁵	\$ 4,890,192	\$ 4,995,203	\$ 5,224,651	\$ 5,557,591	\$ 5,688,814	\$ 5,990,356						
Number of Cust/Connections ^{2,4}	15,341	18,286	18,736	19,073	19,718	20,319						
Number of FTEs ^{3,4}	39	39	38	44	44	44						
Customers/FTEs	393.36	468.16	491.37	433.48	448.13	461.78						
OM&A cost per customer												
O&M per customer	113	98	97	95	106	107						
Admin per customer	205	175	182	197	183	188						
Total OM&A per customer	319	273	279	291	289	295						
OM&A cost per FTE												
O&M per FTE	44,625	45,754	47,586	41,025	47,348	49,520						
Admin per FTE	80,764	82,131	89,436	85,284	81,943	86,624						
Total OM&A per FTE	125,390	127,885	137,022	126,309	129,291	136,144						

Notes: Connections for Street Light, Sentinel and USL Rate Classes

- 1 If it has been more than three years since the applicant last filed a cost of service application, additional years of historical actuals should be incorporated into the table, as necessary, to go back to the last cost of service application. If the applicant last filed a cost of service application less than three years ago, a minimum of three years of actual information is required.
- 2 The method of calculating the number of customers must be identified. Should correspond with data provided in Appendix 2-IB
- 3 The method of calculating the number of FTEs must be identified. See also Appendix 2-K
- 4 The number of customers and the number of FTEs should correspond to mid-year or average of January 1 and December 31 figures.
- 5 For the test year, the applicant should take into account the system O&M (line 22 of Appendix 2-AB) in developing its forecasted OM&A.

1 MS. PINKE: Yeah, so we click on that, it will take us
2 right there.

3 MS. O'CONNELL: Yeah.

4 MS. PINKE: No, that's not --

5 MS. O'CONNELL: No, it is not that one. Sorry, you're
6 right.

7 MR. BACON: Keep going back. Right. Go right.

8 MS. PINKE: OM&A per customer, 2L.

9 MR. BACON: 2L.

10 MS. O'CONNELL: Okay.

11 MS. PINKE: If we looked at line -- at row 19 --

12 MS. O'CONNELL: Okay. I see --

13 MS. PINKE: -- it is number of customers and
14 connections.

15 MS. O'CONNELL: Okay. In other applications I've seen
16 it just "customers", but I'll leave it, because it does say
17 "customer and connections."

18 MS. PINKE: I think that needs to be clarified if
19 you're having --

20 MS. O'CONNELL: I know.

21 MS. PINKE: -- because this is also how we report on
22 PBR, which has a really big impact on the, you know, the
23 PEG data.

24 MR. BACON: Can you just scroll down to row 30 and see
25 what that says. Connections for street -- yeah --

26 MS. PINKE: Street light, Sentinel, and USL. So --

27 MR. BACON: Right. The spreadsheet itself shows
28 connections.

Appendix 2-JC OM&A Programs Table

Programs	Last Rebasing Year (2013 Board-Approved)		Last Rebasing Year (2013 Actuals)		2014 Actuals		2015 Actuals		2016 Bridge Year		2017 Test Year		Variance (Test Year vs. 2015 Actuals)		Variance Test Year to 2016 Actuals		Variance (Test Year vs. Last Rebasing Year (2013 Board-Approved))	
	CGAAP	CGAAP	CGAAP	CGAAP	CGAAP	MIFRS	MIFRS	MIFRS	MIFRS	MIFRS	MIFRS							
Operations																		
1) Distribution Station	54,624	65,902	60,220	63,521	66,663	66,760	66,663	66,760	66,663	66,663	66,760	66,663	66,760	3,239	97	12,137		
2) Overhead Distribution Operations	101,453	123,146	125,841	156,658	145,183	169,591	145,183	169,591	145,183	145,183	169,591	145,183	169,591	12,933	24,408	68,138		
3) Underground Distribution Operations	71,932	107,020	121,324	118,116	111,574	136,637	111,574	136,637	111,574	111,574	136,637	111,574	136,637	18,521	25,063	64,704		
4) Distribution Meters	215,732	186,719	215,366	241,353	239,835	262,730	239,835	262,730	239,835	239,835	262,730	239,835	262,730	21,378	22,896	46,998		
5) Customer Workorders	42,222	139,974	155,948	156,993	141,486	173,206	156,993	173,206	141,486	141,486	173,206	141,486	173,206	16,213	31,720	130,984		
6) Engineering/Systems Ops/Line Constru/SCADA/Ops Admin	748,268	701,238	664,279	640,928	647,351	722,204	640,928	722,204	647,351	647,351	722,204	647,351	722,204	81,276	74,853	-26,063		
Sub-Total	1,234,230	1,323,999	1,342,978	1,377,569	1,352,091	1,531,128	1,377,569	1,531,128	1,352,091	1,352,091	1,531,128	1,352,091	1,531,128	153,559	179,037	296,898		
Maintenance																		
1) Overhead Distribution Lines/Feeders	379,731	326,707	275,315	281,961	545,783	410,167	281,961	545,783	545,783	545,783	410,167	545,783	410,167	128,206	-135,616	30,436		
2) Underground Distribution Lines/Feeders	73,103	74,486	142,880	105,037	146,802	136,079	105,037	146,802	146,802	146,802	136,079	146,802	136,079	31,042	-10,723	62,976		
3) Distribution Meters	34,732	27,299	23,803	23,319	23,216	27,888	23,319	23,216	23,216	23,216	27,888	23,216	27,888	4,569	4,672	-6,844		
4) Distribution Transformers	18,595	34,660	29,480	17,208	15,441	73,628	17,208	73,628	15,441	15,441	73,628	15,441	73,628	56,420	58,187	55,033		
Sub-Total	506,161	463,151	471,477	427,525	731,242	647,661	427,525	731,242	731,242	731,242	647,661	731,242	647,661	220,236	-83,481	141,600		
Community Relations																		
1) Community Relations	8,586	5,419	5,663	8,066	14,699	11,640	8,066	14,699	14,699	14,699	11,640	14,699	11,640	3,574	-3,059	3,054		
Sub-Total	8,586	5,419	5,663	8,066	14,699	11,640	8,066	14,699	14,699	14,699	11,640	14,699	11,640	3,574	-3,059	3,054		
Customer Service																		
1) Bad Debts	60,017	86,391	119,440	59,455	85,973	77,600	59,455	85,973	85,973	85,973	77,600	85,973	77,600	18,145	-8,373	17,583		
2) Customer Service & Billings	610,762	613,080	690,010	691,348	608,683	702,939	691,348	608,683	608,683	608,683	702,939	608,683	702,939	11,591	94,256	92,176		
3) Customer Collections	327,173	355,468	360,085	345,313	356,417	368,742	345,313	356,417	356,417	356,417	368,742	356,417	368,742	23,429	12,325	41,568		
Sub-Total	997,953	1,054,939	1,169,535	1,096,116	1,051,073	1,149,280	1,096,116	1,051,073	1,051,073	1,051,073	1,149,280	1,051,073	1,149,280	53,164	98,208	151,327		
Administration																		
1) Information Systems	193,625	242,079	233,742	282,148	319,264	335,309	282,148	319,264	319,264	319,264	335,309	319,264	335,309	53,161	16,045	141,683		
2) Insurance	82,174	94,194	95,797	93,838	110,826	106,700	93,838	110,826	110,826	110,826	106,700	110,826	106,700	12,862	-4,126	24,526		
3) Audit, Legal and Consulting	132,208	123,227	131,529	199,342	129,454	175,667	199,342	129,454	129,454	129,454	175,667	129,454	175,667	-23,675	46,213	43,459		
4) Building and Office Supplies	239,681	166,531	221,715	349,377	309,304	322,574	349,377	309,304	309,304	309,304	322,574	309,304	322,574	-26,803	13,270	82,893		
5) Management, Administrative, Finance, Regulatory and IT	1,382,509	1,344,476	1,469,885	1,603,271	1,479,095	1,613,297	1,603,271	1,479,095	1,479,095	1,479,095	1,613,297	1,479,095	1,613,297	10,026	134,202	230,788		
6) Regulatory Affairs (assessment & application costs)	113,064	177,188	82,330	120,339	191,767	97,000	120,339	191,767	191,767	191,767	97,000	191,767	97,000	-23,339	-94,767	-16,064		
Sub-Total	2,143,263	2,147,695	2,234,998	2,648,314	2,539,709	2,650,546	2,648,314	2,539,709	2,539,709	2,539,709	2,650,546	2,539,709	2,650,546	2,232	110,837	507,284		
Miscellaneous																		
Total	4,890,192	4,995,203	5,224,651	5,557,591	5,688,814	5,990,356	5,557,591	5,688,814	5,688,814	5,688,814	5,990,356	5,688,814	5,990,356	432,765	301,542	1,100,164		

Notes:
 4890317 4995203 5224651 5557590.7 5688813.937 5990355.765
 125 0 0 0 0 0
 Please provide a breakdown of the major components of each OM&A Program undertaken in each year. Please ensure that all Programs below the materiality threshold are included in the miscellaneous line. Add more Programs as required.
 2 The applicant should group projects appropriately and avoid presentations that result in classification of significant components of the OM&A budget in the miscellaneous category
 * \$125 difference in the 2013 Board Approved column totals is due to account 5685 on the OM&A having \$125 allotted to it that should not have been part of the forecasted budget, and therefore has not been added to this chart

1 MR. SHEPHERD: So this was work that should have been
2 done in prior years, but couldn't be done because you had
3 to focus on other things? Is that...

4 MR. DAVISON: That's correct.

5 MR. SHEPHERD: So this is the ordinary course stuff.
6 It's stuff you've done in the past. It is just sort of a
7 little bit -- it's like backlog.

8 MR. DAVISON: That's correct, that's correct. It's
9 backlogged, because we haven't -- we had to put off on
10 doing this work, so this money is allocated to that.

11 MR. SHEPHERD: Thanks.

12 MR. GARNER: My next question goes to 2 Staff 24.

13 It is rather a generic question that really follows to
14 the next interrogatory and otherwise. I don't want to jump
15 all around, and perhaps from Mr. Thompson of METSCO can
16 help you with you this.

17 It also goes to what's in your distribution plan and
18 the InnPower distribution asset condition summary, and
19 there is a table -- I can give you the reference. You
20 don't have to pull it up, but I'm sure you're familiar with
21 the table at figure 3.5.

22 What that table is -- it is at page 65 of the DSP.
23 What table does is it gives you your asset condition
24 summary in a graphical form, sort of a -- yellow is fair,
25 and green is good, and dark green is very good, et cetera.

26 I couldn't recall when I was looking at this
27 interrogatory response and then the subsequent
28 interrogatory responses, I couldn't recall in your

UNDERTAKING JT1.20

Undertaking:

TO PROVIDE THE OM&A BREAKDOWN TO THE END OF JULY, INCLUDING LABOUR VERSUS NON-LABOUR.

Reference: Transcript dated September 12, 2017 page 143, line 20 to page 144 line 16.

Response:

InnPower has reflected the actual unaudited OM&A by program as of July 31, 2017, with labour and non-labour components separated. Please refer to Table JT1.20 for the OM&A Breakdown to the end of July 2017, including Labour vs. non-labour costs.

Table JT1.20 Appendix 2-JC updated to include the OM & A Breakdown to the end of July 2017, including Labour vs. non-labour costs

Appendix 2-JC OM&A Programs Table					
Programs	2017 Test Year		YTD July 31, 2017	YTD July 31, 2017	YTD July 31, 2017
Reporting Basis	MIFRS		Labour	Non-Labour	Total
Operations					
1) Distribution Station	66,760		5,416	37,133	42,549
2) Overhead Distribution Operations	169,591		107,872	14,157	122,029
3) Underground Distribution Operations	136,637		9,306	32,172	41,479
4) Distribution Meters	262,730		51,795	94,276	146,071
5) Customer Workorders	173,206		27,603	37,158	64,762
6) Engineering/ Systems Ops/Line Constru/SCADA/Ops Admin	722,204		399,862	75,046	474,908
Sub-Total	1,531,128		601,855	289,942	891,797
Maintenance					
1) Overhead Distribution Lines/Feeders	410,167		69,587	75,837	145,424
2) Underground Distribution Lines/Feeders	136,079		52,350	54,545	106,895
3) Distribution Meters	27,888		279	13,274	13,553
4) Distribution Transformers	73,628		6,025	8,886	14,911
Sub-Total	647,761		128,241	152,542	280,784
Community Relations					
1) Community Relations	11,640		0	1,827	1,827
Sub-Total	11,640		0	1,827	1,827
Customer Service					
1) Bad Debts	77,600		0	38,248	38,248
2) Customer Service & Billings	702,939		187,052	137,770	324,822
3) Customer Collections	368,742		165,531	43,937	209,468
Sub-Total	1,149,280		352,582	219,955	572,537
Administration					
1) Information Systems	335,309		0	176,230	176,230
2) Insurance	106,700		0	65,797	65,797
3) Audit, Legal and Consulting	175,667		0	121,198	121,198
4) Building and Office Supplies	322,574		0	181,642	181,642
5) Management, Administrative, Finance, Regulatory and IT	1,613,297		831,773	45,069	876,842
6) Regulatory Affairs (assessment & application costs)	97,000		0	75,796	75,796
Sub-Total	2,650,546		831,773	665,732	1,497,505
Miscellaneous					
Total	5,990,356		1,914,451	1,329,999	3,244,450

Appendix 2-K Employee Costs

	Last Rebasing Year - 2013- Board Approved	Last Rebasing Year - 2013- Actual	2014 Actuals	2015 Actuals	2016 Bridge Year	2017 Test Year
Number of Employees (FTEs including Part-Time)¹						
Management (including executive)	11	11	11	10	10	10
Non-Management (union and non-union)	28	28	27	34	34	34
Total	39	39	38	44	44	44
Total Salary and Wages including overtime and incentive pay						
Management (including executive)	\$ 1,263,246	\$ 1,367,623	\$ 1,305,406	\$ 1,289,707	\$ 1,188,414	\$ 1,140,261
Non-Management (union and non-union)	\$ 1,876,914	\$ 1,892,440	\$ 2,109,248	\$ 2,262,387	\$ 2,514,913	\$ 2,282,760
Total	\$ 3,140,160	\$ 3,260,063	\$ 3,414,655	\$ 3,552,094	\$ 3,703,327	\$ 3,423,021
Total Benefits (Current + Accrued)²						
Management (including executive)	\$ 252,649	\$ 252,649	\$ 256,012	\$ 260,564	\$ 187,648	\$ 232,278
Non-Management (union and non-union)	\$ 375,383	\$ 375,383	\$ 417,326	\$ 433,000	\$ 385,257	\$ 414,958
Total	\$ 628,032	\$ 628,032	\$ 673,338	\$ 693,564	\$ 572,905	\$ 647,236
Total Compensation (Salary, Wages, & Benefits)						
Management (including executive)	\$ 1,515,895	\$ 1,620,272	\$ 1,561,418	\$ 1,550,271	\$ 1,376,062	\$ 1,372,539
Non-Management (union and non-union)	\$ 2,252,297	\$ 2,267,823	\$ 2,526,574	\$ 2,695,387	\$ 2,900,170	\$ 2,697,718
Total	\$ 3,768,192	\$ 3,888,095	\$ 4,087,993	\$ 4,245,658	\$ 4,276,232	\$ 4,070,257

Note:

¹ If an applicant wishes to use headcount, it must also file the same schedule on an FTE basis.

² Current employee benefits, plus Pension and Other Post-Employment Benefits costs, as recorded for recovery in distribution rates. Should be consistent with OPEBs costs as documented in Appendix 2-KA.

InnPower Corporation Response:

a) The following table reflects the amount of direct labour capitalized by year:

	2013	2014	2015	2016	2017 Forecasted
\$	558,509	\$ 589,250	\$ 572,333	\$ 646,780	\$ 818,471

b)

APPENDIX 2-K
Appendix 2-K
Employee Costs

	Last Rebasin Year - 2013- Board Approved	Last Rebasin Year - 2013- Actual	2014 Actuals	2015 Actuals	2016 Bridge Year	2017 Test Year
Number of Employees (FTEs including Part-Time)¹						
Management (including executive)	11	11	11	10	10	10
Non-Management (union and non-union)	28	28	27	34	34	34
Total	39	39	38	44	44	44
Total Salary and Wages including overtime and incentive pay						
Management (including executive)	\$ 1,263,246	\$ 1,367,623	\$ 1,305,406	\$ 1,289,707	\$ 1,262,570	\$ 1,276,423
Non-Management (union and non-union)	\$ 1,876,914	\$ 1,892,440	\$ 2,109,248	\$ 2,262,387	\$ 2,593,631	\$ 2,292,161
Total	\$ 3,140,160	\$ 3,260,063	\$ 3,414,655	\$ 3,552,094	\$ 3,856,201	\$ 3,568,584
Total Benefits (Current + Accrued)²						
Management (including executive)	\$ 252,649	\$ 252,649	\$ 256,012	\$ 260,564	\$ 187,648	\$ 232,278
Non-Management (union and non-union)	\$ 375,383	\$ 375,383	\$ 417,326	\$ 433,000	\$ 385,257	\$ 414,958
Total	\$ 628,032	\$ 628,032	\$ 673,338	\$ 693,564	\$ 572,905	\$ 647,236
Total Compensation (Salary, Wages, & Benefits)						
Management (including executive)	\$ 1,515,895	\$ 1,620,272	\$ 1,561,418	\$ 1,550,271	\$ 1,450,218	\$ 1,508,701
Non-Management (union and non-union)	\$ 2,252,297	\$ 2,267,823	\$ 2,526,574	\$ 2,695,387	\$ 2,978,888	\$ 2,707,119
Total	\$ 3,768,192	\$ 3,888,095	\$ 4,087,993	\$ 4,245,658	\$ 4,429,106	\$ 4,215,820

c) The reason for the difference between the statement "InnPower Corporation has 38 full-time employees and three part-time employees" and the 44 FTE's noted is that we neglected to include the contract employees in the original statement.

4.0-VECC-31

Ref: Exhibit 4 (Nov 28)/Table 4-16

- a) Please provide a list of the incremental positions from the 39 FTEs approved in 2013 to the 44 FTEs shown in 2017.
- b) Please identify any position created to backfill any pending retirements

InnPower Corporation Response:

a) The following chart identifies the incremental positions from 2013 and the 2017 FTE's.

1 capitalization of labour into the engineering and operation
2 projects.

3 The -- if there is an increase in subdivision work and
4 system access work, there will be additional labour
5 internally going into those projects. However, the labour
6 would be contributed against.

7 I don't think -- I'm not sure how the changes that
8 they're revising the capital, how that would affect this
9 column.

10 MR. SHEPHERD: I'm going to ask you to undertake to
11 provide a response.

12 Here are the two things that I'd like you to look at
13 in doing the response. First, the compensation costs are
14 going down, and so the increase is actually a larger
15 increase than you would otherwise think, because it is on a
16 lower base. So the percentage of your compensation you're
17 capitalizing is higher.

18 And secondly, your capital -- your net capital
19 spending is going down relative to 2016, and that should
20 also mean that, all other things being equal, your
21 capitalized overheads would go down as well -- or your
22 capitalized labour rather would go down as well.

23 So can you deal with those in the response when you
24 are explaining the reason?

25 MS. COWLES: Yes, I can do that.

26 MS. O'CONNELL: That's JT2.6, it is regarding the
27 amounts in part (a) of the response.

28 **UNDERTAKING NO. JT2.6: TO EXPLAIN THE CAPITALIZATION**

UNDERTAKING JT2.6

Undertaking:

TO EXPLAIN THE CAPITALIZATION OF THE DIRECT LABOUR COSTS AS DESCRIBED IN 4-VECC-30.

Reference: Transcript dated September 13, 2017 page 87, line 18 to page 89 line 1.

Response:

As stated in the undertaking, the compensation costs are going down, and percentage of our compensation capitalizing on is higher. However, the direct capitalized labour is increased in 2017 because it is a forecasted amount, which has not been adjusted to be levelled to reflect the internal staff hours to the external subcontract labour hours. In comparison 2013 to 2016 direct labour capitalized is the actual total amount, which has been levelled to the internally compensated staff, and subcontract amounts actually used.

Witness: Michael Davison

1 will be a reduction.

2 MR. VELLONE: To be clear, are you planning to have
3 these positions filled any time in the next five years?

4 MR. MALCOLM: Yes, we are.

5 MR. VELLONE: Did you actually propose reductions
6 during your test year OM&A budgets to reflect the fact that
7 you are currently seeking candidates for these roles, or
8 does the budget include these roles?

9 MR. MALCOLM: The budget includes the roles.

10 MR. VELLONE: That's what I thought.

11 MR. SHEPHERD: So the budget you have includes costs
12 that you know you are not going to incur in 2017?

13 MR. MALCOLM: Those costs were determined from last
14 year, from 2016 when we did our budgets.

15 MR. SHEPHERD: I understand.

16 MR. MALCOLM: We had an individual that was in the
17 operations manager position in November, but only lasted
18 two weeks.

19 MR. SHEPHERD: I'm not suggesting you're doing
20 something wrong. I'm just trying to understand what you --

21 MR. MALCOLM: I am trying to clarify so you understand
22 where we're at with our budgets, and where our positions
23 are trying to be filled.

24 MR. SHEPHERD: So the budget we're working on right
25 now has some stuff in it that you are not going to spend.

26 MR. MALCOLM: As of today, yes.

27 MR. SHEPHERD: Do we know what the dollars are for
28 that, the total dollars per year? Or can you give us just

1 a ballpark? Are we talking about a couple of hundred
2 thousand dollars, or are we talking about a million
3 dollars?

4 MR. MALCOLM: Currently with the position vacant, we
5 are looking at \$100,000 plus the benefits.

6 MR. SHEPHERD: That's just for that position, and then
7 you have some others as well, right?

8 MR. MALCOLM: That's correct.

9 MR. VELLONE: Ms. Cowles, can you also quantify the
10 cost that you are incurring to deal with the fact that that
11 position is vacant didn't with your union staff as well?

12 MS. COWLES: We have -- one of our unionized position
13 that is on step-up, they get an extra percentage for being
14 in that role. They're also having to on on-call days,
15 evenings, and weekends. So that's an extra expense which
16 normally would be undertaken -- part of that would be
17 undertaken by the manager.

18 There is more overtime being booked and for union
19 staff, that's double time, so there are additional costs.
20 There is an additional line person as well that's been put
21 in place to fill-in for the line foreman.

22 MS. O'CONNELL: So are you proposing the impact of all
23 this would be at least \$100,000 reduction in the test year?
24 Is that what you are proposing, or more?

25 MR. VELLONE: That's not what I've heard. I heard the
26 opposite.

27 MS. COWLES: No, I'm saying it would be less than
28 100,000 because of the offsetting increase in cost for the

1 MR. VELLONE: We can do that.

2 MR. SHEPHERD: That would be great.

3 MR. VELLONE: That would help me as well.

4 MS. DJURDJEVIC: This is JT2.1.

5 **UNDERTAKING NO. JT2.1: TO PROVIDE A LIST OF COST**
6 **CHANGES RELATED TO THE NEW BUILDING AND TO EXPLAIN**
7 **THEM**

8 MS. O'CONNELL: JT2.1.

9 MS. PINKE: Jay, can we just clarify that? Are you
10 looking for the amount of the building over the cost of the
11 previous building?

12 MR. SHEPHERD: No, I'm not.

13 MS. PINKE: Just the new building itself?

14 MR. SHEPHERD: I'm looking at all impacts of the
15 building on your cost, on your revenue requirement, if you
16 like, because that will say rates are going up by X percent
17 because of the building.

18 And so when the board's looking at this, it can say,
19 well, all right, this is how much attention we have to pay
20 to all these other things.

21 All right. So let me -- why don't we take a break, if
22 that's convenient?

23 MS. O'CONNELL: Sure.

24 MR. SHEPHERD: Is it a good time to take a break?

25 --- Recess taken at 10:54 a.m.

26 --- On resuming at 11:20 a.m.

27 MR. SHEPHERD: I have some questions about the
28 documents that were filed in confidence, and so I think

1 it's appropriate to go in camera for that discussion.

2 MR. VELLONE: The applicant agrees.

3 MR. SHEPHERD: So are we now in camera?

4 I want to turn to -- well, let's start with, tell me
5 about InnServices Corporation. What is it -- InnServices
6 Utilities Inc., I guess is the entity. What is it?

7 MR. MALCOLM: InnServices is a municipal service
8 corporation that provides water and wastewater services to
9 the Town of Innisfil.

10 MR. SHEPHERD: Now, does it provide the services to
11 the town or to the customers?

12 MR. MALCOLM: To the customers.

13 MR. SHEPHERD: Okay. So the town used to provide
14 those services?

15 MR. MALCOLM: As a department within the organization.

16 MR. SHEPHERD: And all the way along, like, before
17 InnServices was incorporated and even today, InnPower
18 provides some of the -- does some of the things that are
19 required to provide those services; right?

20 MR. MALCOLM: The water and wastewater billing was
21 provided by InnPower.

22 MR. SHEPHERD: And that's always been true.

23 MR. MALCOLM: (Witness nods)

24 MR. SHEPHERD: And you also provide financial
25 services.

26 MR. VELLONE: Nods don't show up on the transcript.
27 Can I ask you to answer? Nods don't show up on the
28 transcript.

1 MR. MALCOLM: No, I just...

2 While I was with the town, only water and wastewater
3 billing was provided by InnPower.

4 MR. SHEPHERD: Just the billing component.

5 MR. MALCOLM: Just the billing.

6 MR. SHEPHERD: But now -- and so because it was
7 included, the activities were included in the town's
8 financial records?

9 MR. MALCOLM: Yes.

10 MR. SHEPHERD: But now InnServices Utilities relies on
11 InnPower for, what, it's financial back office?

12 MR. MALCOLM: That's correct.

13 MR. SHEPHERD: So -- okay. And it pays you for that?

14 MR. MALCOLM: Yes.

15 MR. SHEPHERD: And so I'm looking at IR number -- I
16 can't find the IR number. Hang on a second, because it's
17 just page after page of tables.

18 Here it is. 4-SEC-34. And if you would look at page
19 184 you will see the -- these are the shared services
20 arrangements that you have; right?

21 MR. MALCOLM: That's correct.

22 MR. SHEPHERD: So in 2015 InnServices was
23 incorporated; right?

24 MR. MALCOLM: Correct.

25 MR. SHEPHERD: And yet this shows that you're still
26 providing your water and wastewater billing to the town,
27 not to InnServices. I don't understand.

28 MR. MALCOLM: It was broken up into part of the town,

1 and then when it changed over as far as the financial
2 services going to InnPower, that's when InnPower took over,
3 so there was an overlap in 2015.

4 MR. SHEPHERD: No, but the water/wastewater business
5 is being carried out by InnServices; right?

6 MR. MALCOLM: The billing is carried out through the
7 agreement with InnPower. InnServices does the water and
8 wastewater operational and maintenance services, so we do
9 the supply and distribution of water within the Town of
10 Innisfil.

11 MR. SHEPHERD: So -- okay. InnServices does the
12 operations side of water and wastewater, yes? And owns the
13 assets?

14 MR. MALCOLM: It owns the assets. It does exactly
15 what a municipal utility does for water and wastewater
16 supply and delivery.

17 MR. SHEPHERD: But it doesn't bill and collect?

18 MR. MALCOLM: We contract that portion out to
19 InnPower, so we provide the information, the meter reads,
20 to InnPower. InnPower bills on our behalf, so we provide
21 them with the rates to bill the customers.

22 MR. SHEPHERD: Okay. But this says that InnPower does
23 the billing on behalf of the town. I thought InnServices
24 was doing this now.

25 MR. MALCOLM: Thank you very much. The town of
26 Innisfil noted on there should read InnServices.

27 MR. SHEPHERD: So that's just incorrect. Okay.

28 MR. MALCOLM: That's just the wording, yes. That's

**Appendix 2-N
 Shared Services and Corporate Cost Allocation ¹**

Year: 2013

Shared Services

Name of Company		Service Offered	Pricing Methodology	Price for the Service	Cost for the Service
From	To			\$	\$
InnPower Corporation	Town of Innisfil	Water Waste Water Billing	Negotiated Agreement	251,044	190,269

**Appendix 2-N
 Shared Services and Corporate Cost Allocation ¹**

Year: 2014

Shared Services

Name of Company		Service Offered	Pricing Methodology	Price for the Service	Cost for the Service
From	To			\$	\$
InnPower Corporation	Town of Innisfil	Water Waste Water Billing	Negotiated Agreement	204,916	172,254

**Appendix 2-N
 Shared Services and Corporate Cost Allocation ¹**

Year: 2015

Shared Services

Name of Company		Service Offered	Pricing Methodology	Price for the Service	Cost for the Service
From	To			\$	\$
InnPower Corporation	Town of Innisfil/InnService	Water Waste Water Billing	Negotiated Agreement	238,308	184,243
InnPower Corporation	InnServices (TOI)	Financial Services	Negotiated Agreement	31,618	31,305

**Appendix 2-N
Shared Services and Corporate Cost Allocation ¹**

Year: 2016

Shared Services

Name of Company		Service Offered	Pricing Methodology	Price for the Service	Cost for the Service
From	To			\$	\$
InnPower Corporation	InnServices (TOI)	Water Waste Water Billing	Negotiated Agreement	235,000	185,650
InnPower Corporation	InnServices (TOI)	Financial Services	Negotiated Agreement	227,645	225,391

**Appendix 2-N
Shared Services and Corporate Cost Allocation ¹**

Year: 2017

Shared Services

Name of Company		Service Offered	Pricing Methodology	Price for the Service	Cost for the Service
From	To			\$	\$
InnPower Corporation	InnServices (TOI)	Water Waste Water Billing	Negotiated Agreement	245,000	193,530
InnPower Corporation	InnServices (TOI)	Financial Services	Negotiated Agreement	232,198	229,899

Corporate Cost Allocation

Name of Company		Service Offered	Pricing Methodology	% of Corporate Costs Allocated	Amount Allocated
From	To			%	\$
<i>eg: parent company</i>	<i>eg: regulated entity</i>				

Note:

1 This appendix must be completed in relation to each service provided or received for the Historical (actuals), Bridge and Test years. The required information includes:

- **Type of Service:**
Services such as billing, accounting, payroll, etc. The applicant must identify any costs related to the Board of Directors of the parent company that are allocated to the applicant.

- **Pricing Methodology:**
Pricing Methodology includes approaches such as cost-base, market-base, tendering, etc. The applicant must provide evidence demonstrating the pricing methodology used. The applicant must also provide a description of why that pricing methodology was chosen, whether or not it is in conformity with ARC, and why it is appropriate.

- **% Allocation:**
The applicant must provide the percentage of the costs allocated to the entity for the service being offered. The Applicant must also provide a description of the allocator and why it is an appropriate allocator.

UNDERTAKING JT2.2

Undertaking:

TO PROVIDE A TABLE DETAILING AMOUNTS PAID BY INNSERVICES TO INNPOWER DURING THE TEST YEAR SHOWING AMOUNTS, REASON FOR PAYMENT, AND CALCULATION.

Reference: Transcript dated September 13, 2017 page 60, line 7 to page 62 line 8.

Response:

Please see Table JT2.2 for YTD amounts paid to InnPower from InnServices Utilities Inc., with amounts and service description as of July 31, 2017.

Table JT2.2 IPC Invoiced to InnServices

IPC Invoiced to InnServices					
YTD July 31, 2017					
Service		Cost	Admin @ 1%	HST	Total
Financial Services	Labour	210,955	2,110	27,698	240,762
Rental		5,460		710	6,170
W/WW Billing services		142,620		18,541	161,160
Occupancy Charges		8,283		1,077	9,360
Reimbursements from IUI:					
	Consulting	4,239			4,239
	Mileage	266			266
	Conference & Seminars	4,716			4,716
	Other	267			267
Total					426,941

InnPower has \$60,000 budgeted in other income for rental, however this figure includes rental from other customers, not just InnServices (ie. Garage space).

InnPower has budgeted \$245,000 as revenue from W/WW Billing Services with an expense offset of \$145,550 for labour and meter expense. From table above: $\$142,000/7*12=\$244,491$

InnPower has budgeted \$4,000 for admin fees for financial services. From table above: $\$2110/7*12=\$3,617$

For the financial services labour component, InnPower recovers the burdened amount from InnServices. This amount was not budgeted within the other income accounts as it well below the materiality threshold.

UNDERTAKING JT1.24

Undertaking:

TO PROVIDE THE CALCULATIONS FOR THE TWO BURDEN RATES IN 8 STAFF 69.

Reference: Transcript dated September 12, 2017 page 165, line 27 to page 166 line 23.

Response:

InnPower has provided both the burden rate breakdown in Table JT1.24A and the hourly burdened rate calculation for 2017 in Table JTT1.24B for both the CSR and Manager positions. An estimate of these hourly rates was used in the analysis to support the specific service charges.

Both the CSR and Manager burden rates are the same and for 2017 have been calculated as follows:

Table JT1.24A Breakdown of Burden Rate

Description	2017 Burden Rate
EI/CPP/EHT	9.2%
WSIB	1.2%
Health/Dental/Life	5.8%
Vacation/Stat/Floater/Sick	20.4%
OMERS	14.6%
Total Payroll Burden % Net Salary	51.2%

Table JT1.4B Calculation of Burdened Rates

Position	Unburdened Hrly Rate	Burden Calc	Burden	Burdened Hrly Rate	Rate IRR 8.0-Staff-69
Customer Service Manager	\$50.54	50.54*.512	\$25.88	\$76.42	\$72.50
Customer Service Rep.	\$30.94	30.94*.512	\$15.84	\$46.78	\$45.20

Actuals for 2017, are presented in the above tables instead of prior year estimates that were previously used to prepare the analysis to support the requested charge.

Witness: Jennifer Cowles/Shannon Brown/Michael Davison

UNDERTAKING JT2.8

Undertaking:

TO PROVIDE THE COMPENSATION COMPONENTS AND UPLIFT RELATED TO THE HOURLY BILLING RATE.

Reference: Transcript dated September 13, 2017 page 97, line 14 to page 99 line 20.

Response:

InnPower provides financial services to InnServices and invoices the burdened labour rate plus a 1% uplift. Table JT2.8 2017 IPC Financial Services Hourly Rates list the positions and hourly rates plus uplift for the employees of InnPower who allocate a portion of their time to InnServices for financial services, including finance, payroll and IT.

The rates used for the period January – June 2017 are prior to union wage increases, and the wages shown for July – December 2017 are post union wage increases.

Table JT2.8 2017 IPC Financial Services Hourly Rates

2017 IPC Financial Services Hourly Rates						
Position	Base Rate (Jan-Jun 2017), \$/per hr	Burdened Rate (Jan-June 2017), \$/per Hr	Uplift 1% (Jan-June 2017)\$/Hr	Base Rate (July-Dec 2017), \$/per HR	Burdened Rate (July-Dec 2017), \$/per Hr	Uplift %1 (Jul-Dec 2017)\$/Hr
1	50.54	76.32	0.76	50.54	76.32	0.76
2	31.25	47.19	0.47	31.25	47.19	0.47
3	32.17	48.58	0.49	32.81	49.54	0.50
4	30.56	46.15	0.46	31.17	47.07	0.47
5	26.30	39.71	0.40	26.30	39.71	0.40
6	16.00	24.16	0.24	16.00	24.16	0.24
7	43.32	65.41	0.65	43.32	65.41	0.65
8	50.07	75.61	0.76	50.07	75.61	0.76
9	30.94	46.72	0.47	31.56	47.66	0.48
10	34.81	52.56	0.53	35.51	53.62	0.54

Witness: Jennifer Cowles

1 MR. MALCOLM: That's correct.

2 MR. SHEPHERD: Okay. So then -- and what this says is
3 that you are charging InnServices, I guess, in the test
4 year, for example, you are charging InnServices for all of
5 the services you provide, \$479,198; right?

6 MR. MALCOLM: 423,429 for the test year 2017.

7 MR. SHEPHERD: Okay. I am just adding the two up
8 here. On the screen you have 479,198. So is that not
9 correct?

10 MR. MALCOLM: 477,198.

11 MR. SHEPHERD: 198. So is that wrong?

12 MR. MALCOLM: That is correct.

13 MR. SHEPHERD: That is correct. Okay. So then can we
14 go to the financial statements of InnServices.

15 Mr. Malcolm, what is your role in InnServices?

16 MR. MALCOLM: President and CEO.

17 MR. SHEPHERD: And are you paid by InnServices?

18 MR. MALCOLM: My salary is paid through InnPower, but
19 50 percent of it goes to InnServices, and InnServices
20 reimburses InnPower.

21 MR. SHEPHERD: Is that part of this 477? Where does
22 that show up in the accounting?

23 MR. MALCOLM: Yes, that would show up in that 477.

24 MR. SHEPHERD: So 50 percent of your salary plus
25 benefits, the whole -- your full remuneration goes through
26 here.

27 MR. MALCOLM: That's correct.

28 MR. SHEPHERD: And then some of the CFO as well?

UNDERTAKING JT2.3

Undertaking:

TO PROVIDE A BREAKDOWN OF HOW MUCH IT COSTS INNPOWER TO ISSUE A BILL.

Reference: Transcript dated September 13, 2017 page 64, line 12 to page 65 line 8.

Response:

Table JT2.3 Cost per Electric Bill provides a breakdown of how much it costs InnPower to issue a bill. The cost per electric bill as well as the cost per bill for additional water costs (e.g. labour and meter reading). InnPower has then combined both costs per bill and split the cost into a 50/50 share. This indicates that the cost per water bill is \$2.33 per bill and InnPower’s pending contracted rate is \$2.40 per bill. By including water and wastewater billing with the electric bill the cost of an electric bill is reduced to \$2.33 per bill as the contract covers the cost of the water and wastewater share. Without water and wastewater billing, the cost per electric bill would be \$3.32.

Table JT2.3 Cost per Electric Bill

2016 actuals	Electric	Water additional costs	Electric & Water /bill per bill	Share 50%
Supervisory billing	\$ 25,470.89			
Billing Labour	\$ 244,454.12	\$ 90,262.49		
Annual CIS Maintenance	\$ 75,000.00			
Meter Reading	\$ 134,346.76	\$ 75,198.43		
subtotal	\$ 479,271.77	\$ 165,460.92		
number of bills annually	198,000	124,000		
cost per bill	\$ 2.42	\$ 1.33		
plus postage/bill	\$ 0.80			
plus bill stock/bill	\$ 0.10			
total per bill	\$ 3.32	\$ 1.33	\$ 4.65	\$ 2.33

Witness: Shannon Brown

1 MS. DJURDJEVIC: That will be JT2.2.

2 **UNDERTAKING NO. JT2.2: TO PROVIDE A TABLE DETAILING**
3 **AMOUNTS PAID BY INNSERVICES TO INNPOWER DURING THE**
4 **TEST YEAR SHOWING AMOUNTS, REASON FOR PAYMENT, AND**
5 **CALCULATION**

6 MR. VELLONE: How do we get around disclosing
7 individual personal information in that response? Are you
8 okay with aggregating them into financial services like
9 they are right now?

10 MR. SHEPHERD: I don't need the names of the
11 employees, just, you know, employee X gets paid \$33 an hour
12 and their burden rate is this much and the result -- and
13 we've got this many hours.

14 MR. VELLONE: The problem is on the record, we know
15 under the financial services category there is only one
16 individual whose salary is split 50-50^. If we
17 disaggregate that more than it currently is, like it's --
18 can we leave it in the same aggregated bucket, is the
19 question.

20 MR. SHEPHERD: Sorry, you are saying that if we -- if
21 you disclose all of this, then we'll know 50 percent of Mr.
22 Malcolm's compensation?

23 MR. VELLONE: Which is, by law, personal
24 information,\; yes.

25 I just need to figure out how to deal with this,
26 because there are rules that the board has about disclosure
27 of personal information and we have to comply with those.

28 MR. SHEPHERD: Okay. I mean, I would have thought

1 that there are hundreds of people in the town of Innisfil
2 who know what Mr. Malcolm's compensation is. But all
3 right.

4 Do whatever you can to provide information. You are
5 aware that I'm going to be -- that we're going to be
6 looking at this, at whether you're getting properly
7 compensated, and it is up to you to provide enough
8 information to show that you are.

9 Just one other thing. In calculating -- the payments
10 that are being made by InnServices to InnPower, the pricing
11 methodology is said to be negotiated agreement. Help me
12 understand that.

13 Just by way of context, that's not one of the
14 categories of pricing methodologies that the Board allows.
15 It allows cost, cost plus, market, et cetera, but
16 negotiating an agreement with a non-arm's-length party is
17 not one of them.

18 MR. BROWN: The new negotiated rates are cost plus 25
19 percent.

20 MR. SHEPHERD: Cost plus 25 percent? So basically the
21 25 percent is a burden.

22 MR. BROWN: That's correct; that's additional revenue.

23 MR. SHEPHERD: That doesn't apply to Mr. Malcolm.

24 MR. BROWN: These costs are per bill, so in the design
25 it is the number of bills. The way we bill back to
26 InnServices is the number of bills issued, and we charge
27 back a per-bill amount and we track staff time dealing with
28 the billing and all the services on that side as the

1 expenses.

2 MR. SHEPHERD: So you have a cost per bill; do you
3 know what the cost per bill is?

4 MR. BROWN: The agreement that's just recently expired
5 was \$2 in the last year of the five years, so it was \$2 per
6 bill for water and wastewater. If it was wastewater only
7 because meter reading was not involved, it was \$1.90 --
8 sorry, \$1.40, and the new negotiated rates are \$2.40 for
9 water and wastewater services combined and \$1.90 with cost-
10 of-living allowances year over year in a five-year
11 agreement.

12 MR. SHEPHERD: And so those numbers are -- the 2.40
13 and the 1.90, those include the 25 percent.

14 MR. BROWN: That is correct.

15 MR. SHEPHERD: And those were done on the basis of a
16 cost analysis that you did on how much it costs you to
17 produce a bill.

18 MR. BROWN: Yes, it was more of an incremental cost,
19 so it's the costs that our staff are doing to do the work,
20 plus the 25 percent.

21 MR. SHEPHERD: Sorry, it was an incremental cost?

22 MR. BROWN: Yes, because we're already issuing bills,
23 so we took it as an incremental cost of -- so we track all
24 of our time, like the financial services, in payroll.
25 Staff put their time allocated to doing a portion of the
26 water and wastewater services, billing, collecting, taking
27 payments, and then that cost is marked up 25 percent, and
28 that's how we derive the per-bill cost.

1 leave replacement and then kept on to do backfill for the
2 accounting manager, who had to take on part of the
3 InnServices. So for the additional scope of the accounting
4 manager, some of that was fed down to InnServices.

5 MR. SHEPHERD: Then InnServices isn't paying you
6 enough for the financial, is it? If you had to add two
7 more people in order to take on InnServices, clearly
8 there's not enough room in the money they're paying you to
9 cover the cost of two more people. I don't understand
10 that.

11 MS. COWLES: So their labour is split; it's not
12 strictly InnServices. We have cross functional duties and
13 there are also -- we also had an approval for an additional
14 financial person to offer services to energy services and
15 to offer additional reporting support to engineering.

16 MR. SHEPHERD: Sorry, I'm having... Leave aside the
17 InnServices part for a second. You had a financial analyst
18 that works solely on the utility, right, before, before you
19 added these additional people.

20 MS. COWLES: Yes, we had -- InnPower had a financial
21 analyst.

22 MR. SHEPHERD: That person wasn't working on
23 InnServices or anybody else, right? They were only working
24 on InnPower, right?

25 MS. COWLES: Strictly InnPower.

26 MR. SHEPHERD: All right. So now in terms of
27 InnPower, how many financial analysts does InnPower have?
28 Forget who employs people. How many FTEs of financial

1 analysis work are being done right now? Is it 1.5, 1.7 --
2 what is it?

3 MS. COWLES: Slightly over 1 is doing work for
4 InnServices. The balance is InnPower.

5 MR. SHEPHERD: Okay, let's assume that we've gone from
6 1 to 2. What is the additional workload that required you
7 to have another financial analysis?

8 MS. COWLES: We had a maternity leave that we had to
9 cover. So we brought in an additional person to cover the
10 maternity leave. We kept them on following the maternity
11 leave to help with the backfill.

12 MR. SHEPHERD: Backfilling who?

13 MS. COWLES: Well, we had accounting clerks that had
14 work because of InnServices, so they were backfilling for
15 some of the InnPower work for InnServices.

16 MR. SHEPHERD: Well, then that's still InnServices.
17 I'm asking only for InnPower. That additional person then,
18 some of their time is InnServices as well, right?

19 MS. COWLES: Yes, the InnServices work is spread
20 throughout the department. There is only one analyst that
21 is strictly InnPower at this time. The others are sharing
22 their duties.

23 MR. SHEPHERD: Okay, thank you. I am actually close
24 to the end.

25 Can you go to 7-SEC-40, please? So for GS over 50 you
26 have a weighting factor for billing and collecting of
27 13.39, so that means your cost to bill and collect a GS
28 over 50 customer is about 13.4 times as much as your cost

1 there.

2 MR. SHEPHERD: Okay. So on this, it is actually
3 incremental, right?

4 MS. COWLES: For every hour that we bill to
5 InnServices, we charge that plus 1 percent back to them.

6 MR. SHEPHERD: So what I'm saying is an employee sits
7 down and they say, oh, wait a second, I just spent ten
8 minutes on InnServices, and I have to record that. And
9 that then gets build to InnServices.

10 But every other minute of their time is billed to
11 InnPower, right?

12 MS. COWLES: Yes, that's correct.

13 MR. SHEPHERD: Okay. Can you go to page 15? This
14 says that InnPower provides confidential and proprietary
15 information to InnServices. Tell me what you are providing
16 to them.

17 MR. MALCOLM: Were you looking at section 26.0?

18 MR. SHEPHERD: 26.1, yes.

19 MR. MALCOLM: The only information that goes between
20 InnPower and InnServices is for the water and wastewater
21 billing only. There is no other information that would be
22 provided to InnServices, except for related to the services
23 provided by InnPower for InnServices.

24 MR. SHEPHERD: You provide -- InnServices doesn't have
25 to worry about things like updating billing information and
26 stuff like that, because you do all that, right?

27 MR. BROWN: That is correct.

28 MR. SHEPHERD: And they don't get paid for that?

1 is one in your evidence. I think this one actually
2 looks like the one in your most recent evidence, too. I
3 don't think it's changed.

4 But then I went back to your original filing, and in
5 your original filing, which was back in November of '16,
6 and in your original filing you have, I believe, exactly
7 the same FTE count, but you have a different bottom line
8 number. It is \$300,000 more, basically, in your original
9 filing, so --

10 MR. VELLONE: In what year, sorry?

11 MR. GARNER: In '17. I am looking at 2017 only right
12 now. I mean, I -- I think there are, actually -- Mr.
13 Vellone, I think there are actually differences in all the
14 bottom lines to your points, so maybe that is a broader
15 question. But I was focusing on '17, which shows this
16 \$300,000 difference between the filing, and yet the FTE
17 numbers don't change as far as I can see at all. So there
18 seems to have been a dis -- which is -- maybe we shouldn't
19 be complaining. It is \$300,000 less than you originally
20 applied for, but it still begged the question about, how
21 did that happen.

22 MS. COWLES: I believe when we first looked at it we
23 took all of the salary wages and benefits and then we
24 realized that we had included the InnServices, the staff
25 that were dedicated to the InnServices labour, and it goes
26 in to offset the other revenue.

27 MR. GARNER: And that would explain what Mr. Vellone
28 was asking about, just the year. I also noticed there were

1 supporting that strategy, and I wonder if you have a
2 schedule or a time frame for how you are going to do that,
3 when you're going to do that?

4 MR. MALCOLM: So the customer engagement will start in
5 the fourth quarter of this year. We will take our results
6 and move it into the first and second quarter of 2018. We
7 will be addressing the needs of the other stakeholders, so
8 our shareholders itself, the staff internally, and then
9 devising from that a roadmap as to where we are today and
10 where we move forward, so with that will be a vision
11 statement, mission statement, value statement to go along
12 with the business plan to move forward.

13 MR. SHEPHERD: So the --

14 MR. MALCOLM: Once we do the business plan then we'll
15 move into an operational plan to sort of advise the staff
16 as to, how do we operationalize our business plan moving
17 forward.

18 MR. SHEPHERD: Okay, so currently what's your target
19 for when you will have your business plan approved by a
20 board of directors, your new business plan?

21 MR. MALCOLM: New business plan will probably be in
22 the third quarter of 2018.

23 MR. SHEPHERD: So a year from now.

24 MR. MALCOLM: Yes.

25 MR. SHEPHERD: And is it your expectation that you
26 will have to do an updated distribution system plan as part
27 of that process?

28 MR. MALCOLM: We'll take a look at it. Until I start

1 seeing the results and start reviewing where we are at and
2 what we're looking at, that will be part of the process, is
3 to look at the entire organization as a whole.

4 MR. SHEPHERD: So it may include a new DSP?

5 MR. MALCOLM: Not sure at this time, but we'll address
6 that when we get there.

7 MR. SHEPHERD: All right. Is it your intention to
8 file any of this new material with the Board? Like your
9 new strategic plan, for example, or anything like that?

10 MR. MALCOLM: I'm sure there is a regulatory
11 requirement to do --

12 MR. SHEPHERD: I didn't ask whether it was required.
13 I said: Is there intention to file it?

14 MR. MALCOLM: It was not our intention to file with
15 the Ontario Energy Board. It's -- the intention is an
16 internal living document within InnPower.

17 MR. SHEPHERD: Okay, can you go to 2-Staff-31, please.
18 So I'm trying to understand this weighting system for asset
19 management, and I went back and forward, and I have all
20 these numbers written around it, and I think maybe I might
21 be misunderstanding it, because it seems to me that if you
22 look at (c), you seem to be saying that if something has a
23 small risk then it has a value of zero; right?

24 MR. THOMPSON: There is an assumption made about
25 understanding the math. E to the zero is one; it has a
26 value of one, if it's small.

27 MR. SHEPHERD: E to the zero is zero, isn't it?

28 MR. THOMPSON: No. Anything to the power of zero is

1 one.

2 MR. SHEPHERD: Okay. And so the highest risk category
3 which is safety, right? Safety is always highest risk.

4 MR. THOMPSON: High -- yes, safety is highest risk.

5 MR. SHEPHERD: And that's multiplied by itself four
6 times. So I'm wondering when you use exponents, doesn't
7 that mean that nothing else matters, except safety?

8 MR. THOMPSON: No. The truth is you haven't
9 understood the model, and it's not your fault. It is a bit
10 unclear and I'm trying to think of the best way to describe
11 it.

12 Probably the simplest way is to refer to the diagram
13 in the DSP, which will just take me a second to find.

14 MR. SHEPHERD: Okay.

15 MR. THOMPSON: Page 90 of the DSP, section 3.3.2.

16 MR. SHEPHERD: Okay.

17 MR. THOMPSON: If you'd like to put your finger on
18 that page and also -- just looking for a good example where
19 it's applied. Page 174 of the DSP which -- sorry, it
20 starts re-numbering, so it is 174 of the material
21 investment summaries, appendix A.

22 If you could find a way to keep a finger on both those
23 pages, it would probably be most useful.

24 MR. VELLONE: Is this the second page reference?

25 MR. THOMPSON: It is page 174 of appendix A, which
26 might be page 360 on your PDF. It is, good, okay.

27 So this is the application of the prioritization, and
28 the explanation is the first table. So I will need to use

1 the first table to start.

2 So first of all, this is a numerical method of
3 assigning priorities for the purposes of discussion. It is
4 not hard and fast math. It is not based on numerical risk
5 assessment or other things; it is a subjective approach to
6 quantifying priority.

7 Second of all, for the purposes of math, I had worked
8 this out, but if you look across the bottom line where it
9 says "very unlikely", where it starts there ...

10 MR. SHEPHERD: Yes.

11 MR. THOMPSON: That 1 under small, that is the
12 mathematical result of E to the zero.

13 It's 1, okay? E to the 1 -- E is 2.7 to the power of
14 1 is 2.7.

15 MR. SHEPHERD: Okay.

16 MR. THOMPSON: I'm just going across the bottom line,
17 because it happens to have a 1 multiplier in it, so it
18 gives us the math.

19 7.4 is E to the 3; 2.7 times 2.7 times 2.7 is 7.4. I'm
20 just doing math, okay.

21 If you multiply that by 2.7 again, you get 20.1. And
22 if you multiply it by 2.7 again, you get 54.6.

23 MR. SHEPHERD: All right. And that's the probability
24 that the thing will happen?

25 MR. THOMPSON: Right. That is the value assigned to
26 the probability. So the most likely event gets a
27 probability value of 9. If the most likely event was also
28 the worst case event, the 9 times 54.6 equals 491. It just

1 does; I've checked the math.

2 MR. SHEPHERD: So it's not 9 to the power of 4.

3 MR. THOMPSON: No, it is E to the power of 4 times a
4 probability of 9.

5 MR. SHEPHERD: And E is 2.7?

6 MR. THOMPSON: Yes.

7 MR. SHEPHERD: All right.

8 MR. THOMPSON: Now, that happens for each of the six
9 risk factors that are listed. If you could scroll so that
10 I could see one or two lines at the top of the page.

11 So each of those risk -- stop, please. Each of these
12 risk factors for every given project -- so there is a
13 public safety risk, a regulatory legislative risk,
14 environmental risk, low growth risk.

15 So for every project, those risks -- so for instance,
16 a project involving a line rebuild of a major pole at an
17 intersection, it might have a contribution from public
18 safety, it might have a contribution from regulatory, it
19 could have a contribution from anyone of these, and this is
20 where I suggest that we flip to the other chart.

21 So the six risks each have a weight. You see the
22 first column; there's a weight.

23 MR. SHEPHERD: That's what you call "priority" here in
24 this response.

25 MR. THOMPSON: Right, that's the value that InnPower
26 is subscribing -- assigning to that particular risk item.

27 MR. SHEPHERD: Relative to the others?

28 MR. THOMPSON: Relative to the others. So we can see

1 that ensuring public and worker safety is the most highest
2 weighted item. If all of the elements of a given project
3 were the same, that would drive evaluation.

4 Similarly, the next two items are legislation and
5 environmental, and they are same weighted. And the next
6 two items -- the next three are similarly weighted at .75,
7 okay?

8 MR. SHEPHERD: Yes.

9 MR. THOMPSON: So for every project, a likelihood that
10 there is an impact on public safety as assigned, which is a
11 1 to -- I've mixed myself up again.

12 Which chart is it? 1 to 55 or 1 to 9 likelihood --
13 likelihood 1 to 9, and the consequence of that happening on
14 a 1 to 55 scale. So the -- in this case, the 2-and-a-half
15 is multiplied by the 1, which is then multiplied by the
16 1.25 for the weight and given a total in that line.

17 And then those totals are added up, and that gives you
18 a relative priority for every project that was evaluated in
19 this model.

20 MR. SHEPHERD: So the weighting is a relatively narrow
21 band. The likelihood is a broader band and the consequence
22 then, because it's exponential, is a very broad-band.

23 MR. THOMPSON: Yes.

24 MR. SHEPHERD: Is there a reason for that?

25 MR. THOMPSON: Umm...

26 MR. SHEPHERD: I'm looking for the underlying logic.

27 MR. THOMPSON: So the logic is that when the
28 prioritization was developed, there was a preference to put

1 an emphasis on the consequence.

2 The consequence you're understanding is a very broad
3 band. For instance, the consequence of trimming a single
4 branch might be a secondary service to a single house where
5 the consequence of trimming another branch could be a 44 kV
6 feeder that supplies a very large part of the town of
7 Innisfil. So the consequence does have a very broad
8 reaching.

9 MR. SHEPHERD: But the probability that it will happen
10 has much less impact. That seems...

11 MR. THOMPSON: Probability that something will happen
12 is -- to be honest, the consequence of something happening
13 is pretty predictable. You understand whether it affects
14 all of your customers or one of your customers.

15 The probability of something happening, just even
16 breaking that down to a 10 percent, or a 20 percent, or a
17 70 percent probability is a pretty gross generalization in
18 the first place.

19 MR. SHEPHERD: See, I guess -- well, two things.
20 First of all, this model; is this METSCO's model, or is
21 this one that is commercially available?

22 MR. THOMPSON: This model is specific for the DSP.

23 MR. SHEPHERD: So it's never been used anywhere else
24 that you know of?

25 MR. THOMPSON: Not exactly this model, no.

26 MR. SHEPHERD: All right. And have you tested it, for
27 example, back-testing against past activities to see
28 whether it produces the right results?

1 MR. THOMPSON: No, we forward-tested it. We basically
2 took the model. We put the projects into it that we are
3 proposing, we examined the list, and found that it made
4 sense. It reported what we were trying to say.

5 There is -- when you look at the prioritized list,
6 which is another table -- I suppose we can give up the
7 first one and move to -- which I believe is the final table
8 of Chapter -- no, I'm sorry, it's not the final table.
9 Maybe it is. I'm just looking for the table that lists all
10 the projects with their scores.

11 Oh, sorry, it is Table 4-13. It is on page 120 of the
12 DSP. You have to be in the DSP body proper.

13 MR. VELLONE: 4-13. So keep going down.

14 MR. THOMPSON: Page 120. That was it. So again, the
15 result of using this model is a fairly broad band of
16 scores. However, as we have been talking about these --
17 some of these development scores, the reason their math
18 works out to 500 was first of all a function of the
19 weighted average of those priorities being greater than 1.
20 Otherwise 490 would be the limit. But that said, they were
21 considered to be extremely likely and extremely --
22 extremely high probability that the development would go
23 ahead and that the line would be required.

24 In our newest thinking these projects have gone from
25 being extremely high-priority projects to being mandatory
26 projects, so they'll come off this list, but the fact that
27 they're at the top of it sort of proves the point.

28 MR. SHEPHERD: So I just want to circle back here.

1 The -- you built this brand-new model. You then tested it
2 by seeing whether it produced the results you wanted?

3 MR. THOMPSON: So we are saying that the model is
4 subjective in the first place, but the test is -- passes
5 the reasonableness test that the project does list the
6 higher, more important projects at the top and the lower
7 and less important projects at the bottom, and with any
8 sort of prioritization like this, what you are looking for
9 is the projects on the bubble. How is it sorting them?

10 The ones that are extremely high -- extremely
11 important or extremely unimportant have shown up where they
12 expect, and then the answer is, what is this telling us
13 about the ones in the middle? That's really where the
14 value is.

15 MR. SHEPHERD: I'm wondering why you would have this
16 model at all if you are just relying on engineering
17 judgment anyway. The only basis on which you say the
18 model works is the engineers like it. Come on.

19 MR. THOMPSON: I have seen projects like this where
20 the project was simply ranked 1, 2, 3, and 4, and it does
21 demonstrate what the engineer is trying to tell you about
22 the priority of the projects. It is not trying to be more
23 objective than that.

24 MR. SHEPHERD: So bottom line is that you are not
25 actually using the model to choose -- to choose what
26 projects to do. You are using -- the model is simply a way
27 of demonstrating to the regulator that there is some
28 backup.

1 MR. THOMPSON: How the project has been prioritized,
2 so whether -- so if the project has a safety component and
3 is a worst-case scenario, it will have a high score.

4 MR. SHEPHERD: That seems like a bit of a waste of
5 time. I mean, if the engineers are just deciding what the
6 right project is to do, then let them do it. Why make them
7 go through all these hoops?

8 MR. THOMPSON: The inputs are subjective enough that
9 you can in fact say that if you think a project is highly
10 likely then suddenly it is highly likely, right? So that
11 is what's going on at this level of modelling.

12 There are sort of state-of-the-art risk-based
13 modelling techniques that require data inputs that aren't
14 even available to a common -- you know, at a DSP -- LDC
15 level, and there is a lot of study going on in that, and
16 METSCO is involved in some of those studies, and we, as
17 experts, are sitting on committees at very high levels, and
18 we are finding for very large populations of data you
19 can -- you can find things out that you might not have
20 thought about using those techniques, but for instance, if
21 I could predict with any certainty what the probability was
22 of a pole failing, and then plug that number into the cost
23 of replacing the pole and multiply it out, I would have a
24 very useful chart. But honestly, I can't predict with that
25 kind of certainty what the likelihood is that a storm will
26 come and land on that particular pole and wipe it out.

27 MR. SHEPHERD: No, but surely the purpose of the model
28 is to -- if you were actually using the model as a decision

a) The following methodology is used by InnPower to determine the per unit load calculation in our forecast study:

- Customer Count (Input)
- 2-IPC winter peak load (Input)
- 3-TS peak load (Input)
- 4-Diversified peak load at IPC peak= 2/1
- 5- Diversified peak load at TS peak = 3/1
- 6-Average of 4 & 5(IPC & TS peak) = Per unit load
- As customer count grows diversified peak load per customer should decrease and should be trended which can be seen in IPC new system planning"

The following table demonstrates the output of the aforementioned methodology:

Methodology used by InnPower for IESO Load Forecast Study					
	Customer Count	IPC Peak (MW)	TS Peak (MW)	Diversified Peak Load at IPC Peak	Diversified Peak Load at TS Peak
Alliston TS	9678	42.2	35	4.4	3.7
Barrie TS	3843	14.3	12	3.7	3.0
Everett TS	712	2.8	2	4.0	3.3
Total	14233	59.3	49.5	4.2	3.5
Average for TS & IPC Peak (KW)	3.8				

Residential Growth Forecast in Town of Innisfil 2016-2025																				
Absorbion Rate	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	
# of Units																				
Development Name	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	Total
Lefroy	96	96	96	72.8	56	112	140	133.6	52	52	40	40	40	40	40	40	40	40	40	1266.4
Friday Harbour	162.5	97.5	97.5	97.5	97.5	65	65	65	65	65	65	65	32.5	0	0	0	0	0	0	1040
Sleeping Lion	0	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	1170
Residential Growth Forecast in Annexed Lands City of Barrie 2016-2025																				
Absorbion Rate	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	
# of Units																				
Development Name	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	Total
South Barrie	0	0	130	178.75	178.75	178.75	178.75	0	0	0	0	0	0	0	0	0	0	0	0	845
South Barrie	0	0	97.5	130	130	130	130	0	0	0	0	0	0	0	0	0	0	0	0	617.5
South Barrie	0	0	123.5	156	156	156	156	0	0	0	0	0	0	0	0	0	0	0	0	747.5
South Barrie	0	0	52	52	52	52	52	0	0	0	0	0	0	0	0	0	0	0	0	260
South Barrie	0	0	84.5	84.5	84.5	84.5	84.5	0	0	0	0	0	0	0	0	0	0	0	0	422.5
South Barrie	0	0	97.5	97.5	65	130	130	0	0	0	0	0	0	0	0	0	0	0	0	520
South Barrie	0	0	97.5	97.5	33.8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	228.8
South Barrie	0	0	65	65	65	97.5	97.5	0	0	0	0	0	0	0	0	0	0	0	0	390
South Barrie	0	0	65	97.5	97.5	97.5	32.5	0	0	0	0	0	0	0	0	0	0	0	0	390
South Barrie	0	0	31.2	32.5	32.5	32.5	32.5	0	0	0	0	0	0	0	0	0	0	0	0	161.2
South Barrie	0	0	0	0	0	0	0	300.625	297.375	289.25	266.5	260	240.5	234	227.5	97.5	97.5	97.5	97.5	2213.25
South Barrie	0	0	0	0	0	0	0	300.625	297.375	289.25	266.5	260	240.5	234	227.5	97.5	97.5	97.5	97.5	2213.25

b) No changes have been identified as a result of the IRRP recommendations.

2.0-Staff-18

Ref: Chapter 2 Appendices, Appendix 2-AA

InnPower states that it is a high growth utility, and the growth is expected to continue.

- 1 a) Please explain why contributions are forecast to decrease by 20% in 2017 from 2016.
2 b) Please explain InnPower's methodology used to forecast contributions.
3

4 ***InnPower Corporation Response:***
5

- 6 a) *The reduction in contributions (pertaining to new development work) is a result of the anticipated*
7 *delay in recognizing capital based on the assumption that delays in construction schedules (recent*
8 *trade strikes, etc.), the submission of all invoices and related paperwork by Developers for capital*
9 *works performed in the respective subdivisions, and the completions of field audits as well as*
10 *financial audits required to complete the capitalization process will likely push much of the*
11 *recognition of works performed in 2017 to 2018. If more capital contributions are received than*
12 *forecast in 2017, then system access spending will also be higher than forecast (since the capital*
13 *contributions will directly fund these new system access projects that are not currently forecast to*
14 *occur in the test year).*
- 15 b) *InnPower has utilized historical data to determine of completed jobs to determine forecasted*
16 *contributions. The outcome of this data identified 3 categories utilized in the budget process to*
17 *forecast contributions. The three categories are defined as follows:*
- 18 • *"Base 2 – Purchase Order Jobs" which include county road widenings. In this category 50%*
19 *of labour, vehicles, and subcontractor costs (33% total) is contributed capital.*
 - 20 • *"Base 3 – Customer Requests" which include recoverable capital jobs as per Conditions of*
21 *Service. 100% of costs are contributed capital.*
 - 22 • *"Base 4—New Residential Subdivisions" which include new subdivisions where*
23 *approximately 80% is recoverable as contributed capital based on historical trending*
24 *results of the Economic Evaluation. The Economic Evaluation is based on the principle that*
25 *the developer pays up front for costs not otherwise recoverable over a twenty five year*
26 *period.*
- 27
28

29 **2.0-Staff-19**
30

31 **Ref: Chapter 2 Appendices, Appendix 2-JA**
32

33 **Given the high growth experienced by InnPower, one would expect that its assets would be relatively**
34 **new.**

- 35 a) **Please explain why InnPower's Maintenance expense for 2016 and 2017 is significantly higher**
36 **than 2015 actual expense.**
37

38 ***InnPower Corporation Response:***
39

- 40 a) *Growth has not yet reached the point of driving new assets. As a consequence assets are, in fact,*
41 *quite old. Based on the last COS decision some of the planned maintenance work had been*
42 *reduced. The increase in 2016/17 will enable InnPower to get back on track on its maintenance*
43 *program.*
44

1 clarification to that --

2 MS. O'CONNELL: No.

3 MS. PINKE: -- statement, Fiona, but I can state that
4 when we complete Undertaking JT1.6 outlining all the
5 capital contribution changes, that we'll be able to provide
6 an updated answer at that time.

7 MS. O'CONNELL: Okay. That would be great, thank you.

8 MS. PINKE: Okay?

9 MR. SHEPHERD: Can I follow up there, please?

10 You were asked why contributions went down. The
11 correct answer was you made an error. But instead you gave
12 this whole long explanation for a \$2 million reduction.
13 And I'm trying to understand, this explanation is clearly
14 wrong. Where did it come from?

15 MS. PINKE: It -- I did not provide this answer.

16 MR. SHEPHERD: Well, somebody has got to answer it.

17 MR. VELLONE: So maybe the appropriate witness should
18 speak to it.

19 MR. THOMPSON: Yeah, so there is a connection to
20 development plans and capital contributions. We glossed
21 over that a minute ago, but it's there, and if the
22 subdivision doesn't get built then the capital
23 contributions don't get made.

24 MR. SHEPHERD: We understand that. That's not -- that
25 was not my question. My question is, there is an
26 explanation here as to why you're expecting less
27 contributions in 2017.

28 The explanation appears to be entirely made up; none

1 of it's true. I don't understand. Because now we have the
2 correct explanation, and there is no room left for all this
3 other stuff, so who did this explanation and where did they
4 get this information from?

5 MS. COWLES: I'm going to speak to that. When we have
6 a subdivision that is going to be built and there is
7 capital associated with it and approximately 80 percent is
8 contribution, if that subdivision is delayed, then the
9 contributions as well are delayed.

10 The error that we're talking about that was mentioned
11 earlier of the 2.24 was for development work that's in
12 anticipation of the development, not the development
13 itself, which was captured in this answer, but in works
14 that were going to be done to our infrastructure to allow
15 for that development.

16 In the economic evaluation and the distribution system
17 plan, it allows for utility to either build that
18 infrastructure out themselves and put their own capital
19 into it and get a return on capital or to get the developer
20 to contribute to that.

21 What we've realized is that with our financial
22 horizon, with the amount of growth we have, we have got to
23 get -- with our customer feedback, we have got to get the
24 developers to pay for their part of the growth, and these
25 five projects that we are talking about is the error are
26 actually projects that I think originally -- or the
27 previous management had thought that InnPower would be
28 financing that, and we realized that they're really related

1 to system access and these new developments and that the
2 developer has got to be the one to financially support
3 that.

4 MR. SHEPHERD: So let me see if I understand this.
5 When you answered this interrogatory it was correct because
6 you weren't actually expecting to get \$2.2 million from
7 these developers in 2017, but then you changed your policy
8 in some way, and now you are saying to the developers, "You
9 have to pay us"?

10 MS. COWLES: I don't know about the plans specifically
11 in the DSP.

12 MR. THOMPSON: I think what's relevant is that both
13 answers are correct. The number would be \$2 million higher
14 if the development rate had continued as expected and if
15 the excess dollars had been allocated in the right bucket
16 in the first place. I think what we're seeing is
17 \$2 million showing up two different ways.

18 MR. SHEPHERD: You forecast a reduction in
19 contributions of \$2 million. It turns out that -- and you
20 gave an explanation as to why that is, but there isn't
21 actually a reduction in contributions.

22 So, therefore, the explanation explains something that
23 doesn't happen. It's not expected to happen. So how can
24 the explanation be correct? I don't get it.

25 MR. THOMPSON: So the projects that are going to
26 attract the \$2 million in extra contributions are
27 additional projects over what was built in 2016. So if the
28 development rate had happened at the same rate, the

UNDERTAKING JT1.15

Undertaking:

TO PROVIDE AN EXPLANATION RELATED TO THE DOUBLE BUCKET MODEL.

Reference: Transcript dated September 12, 2017 page 99, line 9 to page 100 line 26.

Response:

The double bucket truck that was previously anticipated to go into service in Q4 of 2017 is now expected to go into service in Q1 of 2018.

InnPower does not agree that the cost of \$490,000 should not be included in rate base in the test year. This would amount to a selective reduction to one category of test year capital expenditures without also adjusting for increases in other categories.

For example, please refer to Undertaking JT1.5. As explained in Note 4, actual System Access expenditures in the “Base 4” category are well in excess of budget. Basically, due to very high home prices, developments year-to-date in the InnPower service area have proceeded much faster than were conservatively forecasted. Budgeted amounts for Base 4 (net of contributions) was \$128,256. Actual as of the end of August 2017 is (net of contributions) already \$557,324. Forecasted for the end of 2017 is now (net of contributions) \$2,103,476.

If an update to reflect actuals year-to-date is to be done, it should be done on a comprehensive basis across the entire capital program. It is not correct to reflect only reductions in one category and not reflect corresponding increases in other categories.

The models filed with these undertaking responses have not been updated to reflect the removal of the double bucket truck in 2017.

Witness: Michael Davison

1 MS. O'CONNELL: Page 12 of the settlement agreement.

2 MR. VELLONE: Page 12. So we are going to go to the
3 web drawer to pull it up. So it's EB-2014-0086. I think
4 this is page 10.

5 MS. O'CONNELL: Scroll down. Keep going, keep going.
6 The last sentence in bullet point 3 in the third
7 paragraph; the last sentence in the third paragraph.

8 MR. VELLONE: Okay. I think it might make sense to
9 ask the question in two chunks and I'm going to guide us
10 through it, if that's okay.

11 MS. O'CONNELL: Sure.

12 MR. VELLONE: As part of your amended application, you
13 excluded that vacant chunk of the building by the road, so
14 let's ignore the excluded portion for now.

15 All of the rest of the building you include as revenue
16 offsets leasing revenues in your rate application, the
17 balance of the building excluding that part.

18 MS. COWLES: Yes, that is correct.

19 MS. O'CONNELL: Sorry, what you are saying is you
20 include the vacant part of the building. You excluded the
21 vacant part of the building, so that's why you're saying
22 that the leasing revenues should not be included as a
23 revenue offset. That's what your argument is?

24 MR. VELLONE: We haven't gotten there yet, but you are
25 inferring. And that's roughly the position that the
26 applicant is taking.

27 MS. O'CONNELL: But that's not what the settlement
28 agreement said.

1 MR. VELLONE: If the settlement agreement was an
2 agreement to set and just and reasonable rates back in
3 20 -- when the application was brought to the Board. It
4 was open to the applicant to bring the application today
5 that included the full costs of the building in rate base
6 and record as a revenue offset any amounts of leasing
7 revenues for the full costs of the billing. That's one way
8 that could have been done.

9 Another way that could be done is to include in rates
10 a subset of the cost of the building, and exclude from
11 rates any costs associated with the portions of the
12 building that are not being claimed from customers and at
13 the same time, exclude revenue offsets. There is no
14 revenue offset, because ratepayers are funding that portion
15 of the building. No one is paying for that portion of the
16 building, so why are you recording a revenue offset for it.

17 MS. O'CONNELL: That's not what the -- the settlement
18 agreement said to exclude the cost and also include the
19 revenue offset. That's what the settlement agreement said.

20 MR. VELLONE: The settlement agreement was to set
21 rates back then. Rates -- just and reasonable rates are
22 based on a cost of providing service. The actual costs of
23 this building are on evidence as above \$13 million.

24 The applicant is not asking for that full cost in
25 rates. They're asking for something less associated
26 effectively with a piece of the building that Mr. Shepherd
27 saw when he was there, that is roughly termed "leasing
28 space." They have excluded that from rates. They've

1 excluded all operating cost for that portion of the
2 building from rates, and they're also not recording revenue
3 offsets for that portion of the building.

4 In effect, ratepayers are off the hook for the risk
5 for that piece of the building.

6 MR. SHEPHERD: Can I suggest something, John? Fiona
7 is asking how is that consistent with the agreement; it
8 clearly isn't. You agreed to do something in the future
9 and you didn't do it, which is put leasing revenue in as an
10 offset.

11 So I take it -- and tell me whether this is right --
12 that what you are asking the Board to do now is to decide
13 that the approach you've taken is equivalent to the result
14 that was sought in the settlement agreement. But that's a
15 decision you want the Board to make now.

16 MR. VELLONE: Yes.

17 MR. SHEPHERD: Is that fair?

18 MR. VELLONE: Yes, that's fair.

19 MR. SHEPHERD: Okay.

20 MS. O'CONNELL: That's what -- okay, can I just point
21 out one more comment? You said that the expenses -- so the
22 leasing area has been removed from the revenue requirement.

23 It is my understanding that it still is in the revenue
24 requirement and its about 30 to 37K. Although immaterial,
25 it is part of the OM&A.

26 MR. VELLONE: I'll let the witness speak to this. But
27 my understanding is that all the expenses associated with
28 the leasing space have been removed from -- even operating

UNDERTAKING JT1.5

Undertaking:

TO UPDATE THE 2017 CAPITAL BUDGET APPENDIX 2AA WITH CURRENT SPENDING, PROJECT BY PROJECT, TO JULY 2017; ALSO TO PROVIDE THE 2016 ACTUAL SPENDING FOR WORK DONE IN THE BRIDGE YEAR, FROM JANUARY TO JULY 2016.

Reference: Transcript dated September 12, 2017 page 27, line 21 to page 31, line 3.

Response:

Actual capital expenditures year to date on a project by project basis to July 30th, 2017 is shown in Table JT1.5A. For comparison purposes, actual capital expenditures to July 30th, 2016 is shown in Table JT1.5B (the 2016 data could not be broken down on a project by project basis but totals were available).

InnPower is on track to spend more than what was forecasted in the test year on capital expenditures. As more fully detailed below, the actual spending has changed in several material respects versus what was originally forecasted in the Application. Despite now anticipating total expenditures higher than originally forecast, InnPower is not proposing to change the requested forecasted amount in the rate Application.

Explanations for the actual expenditures that will occur in 2017 relative to each line item are included in the notes below Tables JT1.5A.

Table JT1.5A Capital Expenditures YTD to July 30th 2017

Capital Expenditure							2017	2017
July 30, 2017 YTD							2017	2017
Budget Indicator	Notes	Project	Actual Cost YTD	Actual Contribution	WIP	Net Ytd Actual Cost with WIP	Budget-Net	Year End Forecast-Net
BASE	Note 1	IPC2017Base1 - IPC2017SA01 50%, IPC2017SR01 50%	107,645.56	.00	76,204.28	\$ 183,849.84	\$ 233,765	\$ 233,765
	Note 2	IPC2017Base2 - IPC2017SA02	1,059.68	-1,059.68	196,588.34	\$ 196,588.34	\$ 22,767	\$ 132,929
	Note 3	IPC2017Base3 - IPC2017SA03	168,335.99	-258,050.17	333,766.72	\$ 244,052.54	\$ -	\$ -
	Note 4	IPC2017Base4 - IPC2017SA04	142,929.27	-142,395.66	384,260.00	\$ 384,793.61	\$ 128,256	\$ 2,103,476
BASE Total			419,970.50	-401,505.51	990,819.34	\$ 1,009,284.33	\$ 384,788	\$ -
CAR		IPC2017SA05 - Meters	15,032.96	.00	43,964.46	\$ 58,997.42	\$ 230,000	\$ 230,000
		IPC2017SA06 - Intersection Widening IBR & Yonge St	.00	.00	314.71	\$ 314.71	\$ 272,430	\$ -
	Note 5	IPC2017SR03 - Pole Replacement Program	72,057.43	.00	1,203.06	\$ 73,260.49	\$ 126,470	\$ 126,470
	Note 5	IPC2017SR04 - Infrastructure Replacements and Betterments	32,754.83	.00	71,440.51	\$ 104,195.34	\$ 150,253	\$ 150,253
	Note 5	IPC2017SR05 - Line Reclosure Refurbishments - 4 Year Cycle	.00	.00	.00	\$ -	\$ 15,944	\$ 15,945
	Note 5	IPC2017SR06 - DS Oil Re-inhibit Treatment	.00	.00	193.49	\$ 193.49	\$ 27,527	\$ 27,527
	Note 5	IPC2017SR07 - Padmounted Transformer and Switchgear Replacements and Pa	.00	.00	1,469.78	\$ 1,469.78	\$ 43,710	\$ 43,710
	Note 5	IPC2017SR08 - Station Rehab	2,910.00	.00	8,213.61	\$ 11,123.61	\$ 104,300	\$ 104,300
	Note 6	IPC2017SA07 - IBR & 5 SR	.00	.00	4,415.83	\$ 4,415.83	\$ 415,364	\$ -
		IPC2017SR09 - Ewart Street Rebuild - Phased Approach	.00	.00	116,275.67	\$ 116,275.67	\$ 105,000	\$ 155,000
	Note 5	IPC2017SR02 - Substandard Transformer Rehab	69,079.81	.00	49,365.77	\$ 118,445.58	\$ 85,000	\$ 85,000
	Note 5	IPC2017SR10 - Transformers	303,991.10	.00	.00	\$ 303,991.10	\$ 100,000	\$ 100,000
		IPC2017SR11 - Reliability Rebuild: Subtransmission	81,664.93	.00	45,568.10	\$ 127,233.03	\$ 245,650	\$ 520,650
		IPC2017SR12 - Reliability Rebuild: Distribution	.00	.00	31,665.65	\$ 31,665.65	\$ 95,000	\$ 112,500
	Note 5	IPC2017SS01 - Distribution SCADA Controlled Load Interrupting Gang Switch	.00	.00	.00	\$ -	\$ 75,000	\$ 75,000
	Note 7	IPC2017SS02 - Repoling:Big Bay Pt Rd - Friday Harbour DS to Friday Harbour De	.00	.00	.00	\$ -	\$ -	\$ -
	Note 8	IPC2017SS03 - Repoling:Lockhart Rd - Huronia Rd to Stroud DS	.00	.00	162,589.02	\$ 162,589.02	\$ 618,933	\$ 170,000
	Note 5	IPC2017SS04 - Sandy Cove DS Automation	.00	.00	7,249.24	\$ 7,249.24	\$ 125,000	\$ 125,000
	Note 9	IPC2017SS05 - Line Extension: Mapleview Drive Prince William to Yonge St	.00	.00	.00	\$ -	\$ 837,831	\$ -
	Note 9	IPC2017SS06 - Repoling:5 SR - McKay Road to Salem Rd	.00	.00	.00	\$ -	\$ 635,999	\$ -
	Note 5	IPC2017SS07 - DS Transformer Oil Containment	.00	.00	77.39	\$ 77.39	\$ 45,000	\$ 45,000
	Note 9	IPC2017SS08 - Repoling:McKay Rd - 5 SR to 10 SR	.00	.00	.00	\$ -	\$ 400,041	\$ -
		IPC2017GP01 - IT Hardware	20,601.45	.00	.00	\$ 20,601.45	\$ 165,000	\$ 130,000
		IPC2017GP02 - IT Software	27,327.15	.00	5,585.00	\$ 32,912.15	\$ 95,000	\$ 72,500
		IPC2017GP03 - Furniture and Equipment	.00	.00	.00	\$ -	\$ 15,000	\$ 5,000
		IPC2017GP04 - Buildings and Fixtures	7,953.73	.00	.00	\$ 7,953.73	\$ 15,000	\$ 43,000
		IPC2017GP05 - Finance IT	17,723.77	.00	16,659.44	\$ 34,383.21	\$ 77,000	\$ 77,000
		IPC2017GP06 - Engineering IT	.00	.00	1,622.01	\$ 1,622.01	\$ 167,325	\$ 62,325
		IPC2017GP07 - Measuring Tools & Equipment & Meter	.00	.00	.00	\$ -	\$ 23,000	\$ 27,195
		IPC2017GP08 - Fleet Tools	5,360.20	.00	.00	\$ 5,360.20	\$ 15,750	\$ 15,750
		IPC2017GP09 - Stores Equipment	.00	.00	.00	\$ -	\$ 5,250	\$ 5,250
		IPC2017GP10 - Tools, Shop and Garage Equipment	4,356.78	.00	-686.42	\$ 3,670.36	\$ 24,150	\$ 24,150
		IPC2017GP11 - Measurement and Testing Equipment	.00	.00	.00	\$ -	\$ 28,000	\$ 28,000
		IPC2017GP12 - Replacement Double Bucket Truck - 1993 Altec	.00	.00	153,000.00	\$ 153,000.00	\$ 373,500	\$ -
		IPC2017GP13 - Fleet Vehicle Replacement 1-2006 Ford 1/2 Ton	.00	.00	.00	\$ -	\$ 45,000	\$ -
		IPC2017GP14 - Tech & Locator Vehicles (x4)	.00	.00	.00	\$ -	\$ 87,000	\$ -
		IPC2017GP15 - Distribution Fault Current Indicators	.00	.00	.00	\$ -	\$ 18,760	\$ 18,760
		IPC2017GP16 - System Supervisory	2,963.04	.00	.00	\$ 2,963.04	\$ 32,400	\$ 32,400
							\$ 6,711,162.56	\$ 5,097,855.21
CAR Subtotal			663,777.18	.00	720,186.32	\$ 1,383,963.50		
Subtotal			1,083,747.68	-401,505.51	1,711,005.66			
Grand Total Excluding WIP						\$ 682,242.17		
Grand Total Including 2017 WIP Expenditures						\$ 1,693,945.16		
Grand Total Including Cumulative WIP Expenditures						\$ 2,418,725.65		
Work in Progress (incl. contributions)			Actual Cost YTD					
Opening Balance			724,780.49					
Change for the Year			1,011,702.99					
Current Month Ending Balance			1,736,483.48					

Table JT1.5B Capital Expenditures YTD to July 30th 2016

July 30, 2016 YTD					
Budget Indicator	Project	Actual Cost YTD	Actual Contribution	WIP	Net ytd Actual Cost with WIP
BASE	IPC2017Base1 - IPC2017SA01 50%, IPC2017SR01 50%	130,743.38	.00	.00	\$ 130,743.38
	IPC2017Base2 - IPC2017SA02	.00	.00	.00	\$ -
	IPC2017Base3 - IPC2017SA03	234,158.98	-265,412.12	.00	\$ 31,253.14
	IPC2017Base4 - IPC2017SA04	198,317.19	-196,557.41	.00	\$ 1,759.78
BASE Total		563,219.55	-461,969.53	.00	\$ 101,250.02
CAR	IPC2017SA05 - Meters	57,798.76	.00	.00	\$ 57,798.76
	IPC2016DO001 - Substandard Infrastructure Replacement	23,644.45	.00	.00	\$ 23,644.45
	IPC2017SR03 - Pole Replacement Program	102,163.17	.00	.00	\$ 102,163.17
	IPC2017SR04 - Infrastructure Replacements and Betterments	92,081.31	.00	.00	\$ 92,081.31
	IPC2017SR05 - Line Redclosure Refurbishments - 4 Year Cycle	1,906.99	.00	.00	\$ 1,906.99
	IPC2017SR06 - DS Oil Re-inhibit Treatment	10,863.02	.00	.00	\$ 10,863.02
	IPC2017SR07 - Padmounted Transformer and Switchgear Rep	32,194.61	.00	.00	\$ 32,194.61
	IPC2016DO007 - McKay Rd Rebuild from 5th SR to 10th SR	.00	.00	.00	\$ -
	IPC2016DO008 - Cedar Point DS Transformer Upgrade	.00	.00	.00	\$ -
	IPC2016DO010 - IBR & 5 SR	.00	.00	.00	\$ -
	IPC2016DO012 - Station Reliability Upgrade	.00	.00	.00	\$ -
	IPC2016DO013 - Stroud DS Automation	.00	.00	.00	\$ -
	IPC2016DO014 - BBP DS-Friday Harbour North Entrance	.00	.00	.00	\$ -
	IPC2016DO015 - Ewart Street Rebuild	.00	.00	.00	\$ -
	IPC2016DO016 - Transformers	.00	.00	.00	\$ -
	IPC2017SS02 - Repoling:Big Bay Pt Rd - Friday Harbour DS to	.00	.00	.00	\$ -
	IPC2017SS03 - Repoling:Lockhart Rd - Huronia Rd to Stroud D	.00	.00	.00	\$ -
	IPC2017SS04 - Sandy Cove DS Automation	.00	.00	.00	\$ -
	IPC2017SS05 - Line Extension: Mapleview Drive Prince Willia	.00	.00	.00	\$ -
	IPC2017SS06 - Repoling:5 SR - McKay Road to Salem Rd	.00	.00	.00	\$ -
	IPC2017SS07 - DS Transformer Oil Containment	.00	.00	.00	\$ -
	IPC2017SS08 - Repoling:McKay Rd - 5 SR to 10 SR	.00	.00	.00	\$ -
	IPC2017GP01 - IT Hardware	72,532.94	.00	.00	\$ 72,532.94
	IPC2017GP02 - IT Software	10,040.00	.00	.00	\$ 10,040.00
	IPC2017GP03 - Furniture and Equipment	.00	.00	.00	\$ -
	IPC2017GP04 - Buildings and Fixtures	.00	-30,160.00	.00	\$ 30,160.00
	IPC2017GP05 - Finance IT	4,775.45	.00	.00	\$ 4,775.45
	IPC2017GP06 - Engineering IT	1,963.81	.00	.00	\$ 1,963.81
	IPC2017GP08 - Fleet Tools	4,809.47	-10,499.00	.00	\$ 5,689.53
	IPC2017GP09 - Stores Equipment	.00	.00	.00	\$ -
	IPC2017GP10 - Tools, Shop and Garage Equipment	.00	.00	.00	\$ -
	IPC2017GP11 - Measurement and Testing Equipment	.00	.00	.00	\$ -
IPC2017GP12 - Replacement Double Bucket Truck - 1993 Alte	.00	.00	.00	\$ -	
IPC2017GP13 - Fleet Vehicle Replacement 1-2006 Ford 1/2 T	.00	.00	.00	\$ -	
IPC2017GP14 - Tech & Locator Vehicles (x4)	.00	.00	.00	\$ -	
IPC2017GP15 - Distribution Fault Current Indicators	7,510.34	.00	.00	\$ 7,510.34	
IPC2017GP16 - System Supervisory	412.66	.00	.00	\$ 412.66	
CAR Subtotal		422,696.98	-40,659.00	.00	\$ 382,037.98
Subtotal		985,916.53	-502,628.53	1,590,815.02	
Grand Total Excluding WIP					\$ 483,288.00
Grand Total Including 2016 WIP Expenditures					\$ 1,276,376.41
Grand Total Including Cumulative WIP Expenditures					\$ 2,074,103.02
Work in Progress (incl. contributions)		Actual Cost YTD			
Opening Balance		797,726.61			

Notes

Note 1 - Base 1 - Upon comparison of 2017 July costs to 2016, the projected year end cost is in line and on track for 2017.

Note 2 - Base 2 - 2016 we had no expenses incurred on unbudgeted regional or municipal county works projects that are partially contributed, however for 2017 we are projecting gross capital of approximately \$200,000 and a net capital of \$133,000 for year-end costs.

Note 3 - Base 3 - We expect the net costs of 2017 to be similar to 2016.

Note 4 - Base 4 - The projected increase in capital investment related to subdivision developments is expected to be considerably higher for 2017 as compared to 2016 with the multiple subdivision projects expected to be energized by year end. As shown below in the table the net capital increase of roughly \$2,000,000.

	Base 4 - Budget to Forecasted 2017		
	Transfer price	Contribution	Net Investment
Subdivisions energized August 2017 as Base 4			
Alcona	684,055	476,305	
Ballymore Phase 2&3	234,644	187,198	
Friday Harbour Phase 2	790,899	643,113	
Top Hills	128,909	109,468	
Churchill Downs	181,459	153,520	
Cookshill North	194,790	154,193	
San Diego Phase 2B	210,169	164,007	
Subtotal	2,424,925	1,887,804	
Additional Base 4 projects on track to be completed in 2017			
Friday Harbour Phase 1	13,131,775	11,462,620	
Revised FH Ph 1 (w/o stn)	7,831,775	6,265,420	
TOTAL	10,256,700	8,153,224	2,103,476
2017 Budget	641,280	513,024	128,256
Increase in Budget to Forecasted of Capital Investment 2017			1,975,220

Note 5 - Projects are typically completed in second half of the year.

Note 6 - Pending County confirmation to proceed.

Note 7 - Project moved to base 4 for system access of subdivision.

Note 8 - Pending Municipal approvals for intersection reconstruction.

Note 9 - These projects are deferred due to developer delays.

Witness: Michael Davison/Daryn Thompson

UNDERTAKING JT1.6

Undertaking:

TO UPDATE THE FORECASTED CONTRIBUTIONS IN THE TABLE IN 2 VECC 6.

Reference: Transcript dated September 12, 2017 page 37, lines 10-26.

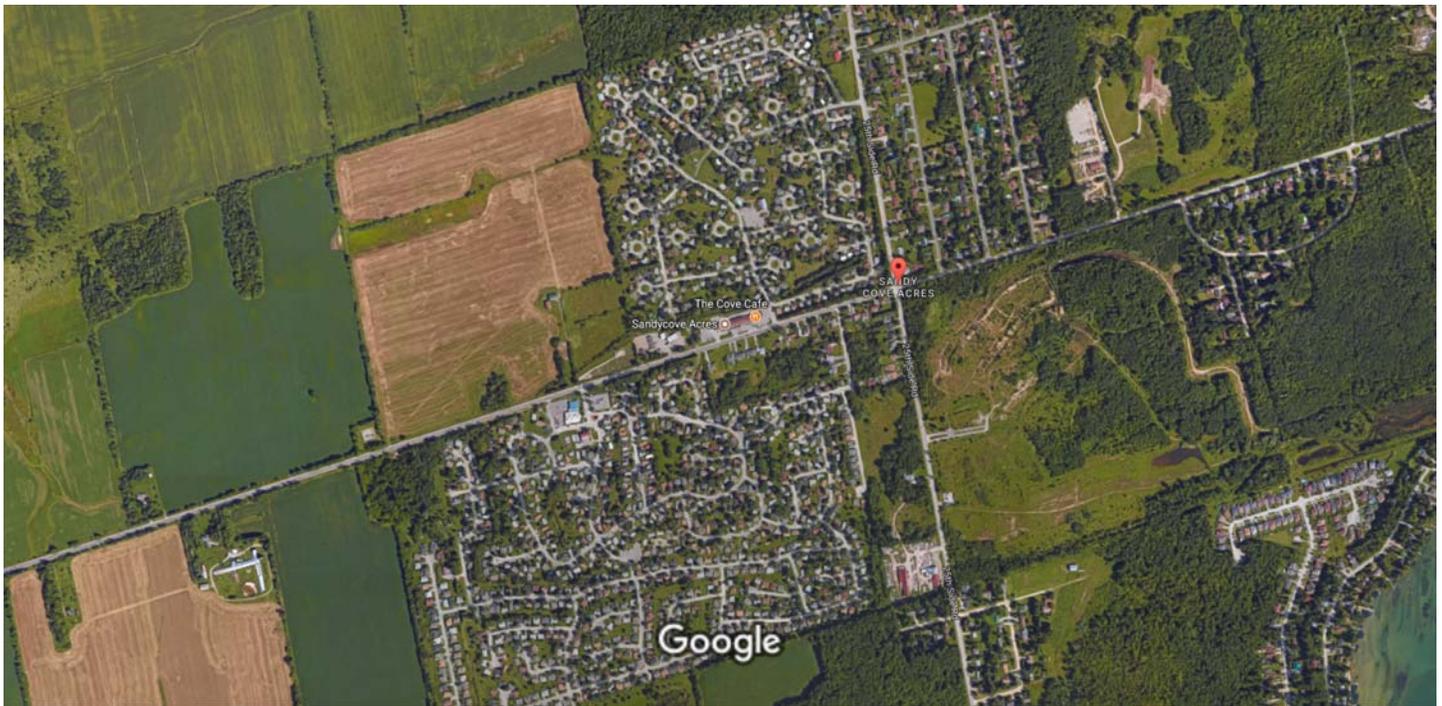
Response:

Table JT1.6 Updated Table from 2 VECC 6

Summary						
	2017	2018	2019	2020	2021	TOTAL
System Access - Before Contributions	\$ 5,910,324	\$14,360,445	\$ 11,585,662	\$ 12,158,616	\$ 13,257,615	\$57,272,661
Contributions	-\$ 4,153,553	-\$11,826,225	-\$ 9,927,905	-\$ 10,450,036	-\$ 11,128,590	-\$47,486,308
System Access - Net of Contributions	\$ 1,756,771	\$ 2,534,220	\$ 1,657,757	\$ 1,708,580	\$ 2,129,025	\$ 9,786,353
System Renewal - Before Contributions	\$ 1,215,739	\$ 1,140,219	\$ 2,919,105	\$ 2,399,973	\$ 2,109,321	\$ 9,784,357
Contributions (None)	0	0	0	0	0	\$ -
System Renewal - Net of Contributions	\$ 1,215,739	\$ 1,140,219	\$ 2,919,105	\$ 2,399,973	\$ 2,109,321	\$ 9,784,357
System service - Before Contributions	\$ 245,000	\$ 78,750	\$ 960,800	\$ 1,005,589	\$ 823,897	\$ 3,114,036
Contributions (None)	0	0	0	0	0	\$ -
System Service - Net of Contributions	\$ 245,000	\$ 78,750	\$ 960,800	\$ 1,005,589	\$ 823,897	\$ 3,114,036
General Plant - Before Contributions	\$ 1,187,135	\$ 1,423,156	\$ 896,813	\$ 680,317	\$ 706,287	\$ 4,893,708
Contributions (None)	0	0	0	0	0	\$ -
General Plant - Net of Contributions	\$ 1,187,135	\$ 1,423,156	\$ 896,813	\$ 680,317	\$ 706,287	\$ 4,893,708
TOTAL - BEFORE CONTRIBUTIONS	\$ 8,558,198	\$17,002,570	\$ 16,362,380	\$ 16,244,495	\$ 16,897,120	\$75,064,763
CONTRIBUTIONS - TOTAL	-\$ 4,153,553	-\$11,826,225	-\$ 9,927,905	-\$ 10,450,036	-\$ 11,128,590	-\$47,486,308
TOTAL - NET OF CONTRIBUTIONS	\$ 4,404,645	\$ 5,176,345	\$ 6,434,475	\$ 5,794,459	\$ 5,768,530	\$27,578,454

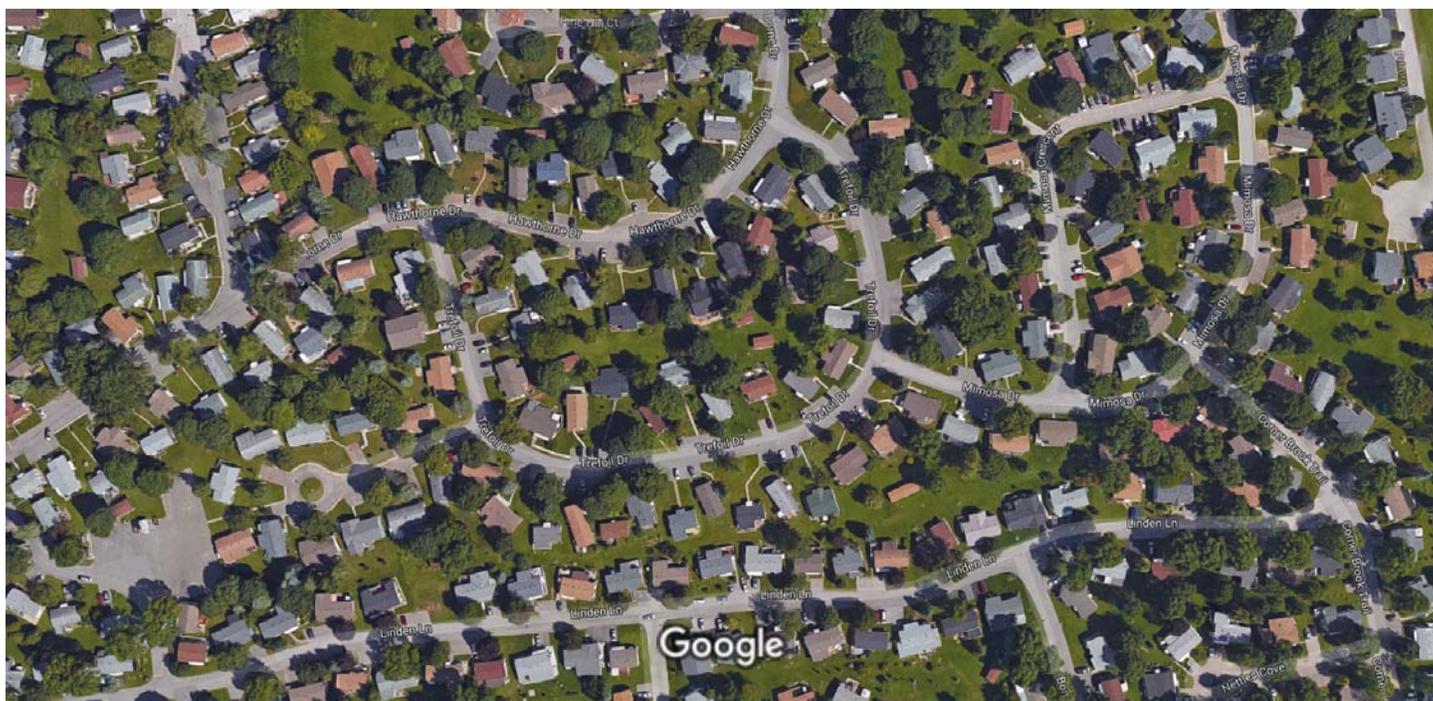
Witness: Michael Davison

Google Maps Sandy Cove Acres



Imagery ©2017 Google, Map data ©2017 Google Canada 100 m

Google Maps Sandy Cove Acres



Imagery ©2017 Google, Map data ©2017 Google Canada 20 m



Sandy Cove Acres

Innisfil, ON L9S 2J6



Google Maps



Imagery ©2017 Google, Map data ©2017 Google Canada 5 m

Google Maps



Imagery ©2017 Google, Map data ©2017 Google Canada 50 m

