



PUBLIC INTEREST ADVOCACY CENTRE
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February 5, 2018

VIA E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli:

**Re: EB-2017-0045 Halton Hills Hydro Inc.
2018 IRM Electricity Rate Application
Vulnerable Energy Consumers Coalition (VECC) Interrogatories**

Attached please find VECC's interrogatories in the above proceeding.

Yours truly,

A handwritten signature in black ink, appearing to read 'Cynthia Khoo', written in a cursive style.

Cynthia Khoo
Counsel for VECC

Cc: David Smelsky, Halton Hills Hydro Inc.

**ONTARIO ENERGY BOARD
IN THE MATTER OF AN APPLICATION BY
HALTON HILLS HYDRO INC. (HHHI)
2018 IRM APPLICATION**

**VULNERABLE ENERGY CONSUMERS COALITION (VECC) INTERROGATORIES
EB-2017-0045**

Z-Factor Application

VECC-1

- a) Page 4: Please provide the actual number of hours for each of the years 2012 to 2017 and budgeted hours for each of the years 2018 to 2020 and January 1, 2021 to April 30, 2021, used to determine costs.
- b) Page 10 Table PE3: Please provide the 2017 year-end customer count by customer class.
- c) Page 11 Table PE4: Please provide the bill impacts of the Pay Equity Adjustments by customer class separately.
- d) Page 11 Table PE4: Please add the Distribution only bill impacts of the Pay Equity Adjustments to the table by customer class.
- e) Page 11 Table PE4: Please add the Distribution only bill impacts to the table by customer class for Depreciation and Pay Equity Adjustments.

VECC-2

Ref 1: Application Page 4
Ref 2: Appendix E

Reference 1 indicates that forecasted costs are until April 30, 2021. At Reference 2, costs are calculated to March 31, 2021. Please reconcile.

VECC-3

Ref 1: Application Page 4
Ref 2: Appendix C

Preamble: HHHI first established a Pay Equity Plan in 1990 and subsequently a Pay-Equity pay-out was achieved through settlement on August 10, 1990 in the amount of \$58,291.60 for union and \$8,972.60 for management with monies to be paid out over a five-year period. HHHI's Pay Equity Committee conducted annual reviews of the Pay Equity Plan each year commencing 1991.

- a) Please provide the driver for HHHI's 1990 Pay Equity Plan.

- b) Has HHHI's Pay Equity Committee, in place since the 1990 Pay Equity Plan, determined that any pay equity adjustments beyond 1990 were needed before this application. Has HHHI made any Pay-Equity pay-outs since 1990? If yes, provide details.
- c) Given HHHI has had a Pay-Equity policy in place since 1990, please explain HHHI's adherence to the policy and why further pay equity adjustments are now required.

VECC-4

Ref: Application Page 5

Preamble: The Settlement Agreement states that the positions that were to be adjusted included Customer Service Representatives, the Dispatch Clerk, the Engineering Clerk and the Clerk Cashier.

- a) Please provide the male comparators identified and the compensable difference for each of the above positions.
- b) Please identify and explain the System of Comparison used and how it is similar and different from the Stevenson Kellogg Ernst and Whirrey job evaluation system used in 1990.

VECC-5

Ref: Application Page 7

Preamble: The evidence indicates that in October 2014, the Government of Ontario issued a mandate to Ontario employers requiring each employer to develop a strategy to further close the wage gap.

Please provide a copy of the above Government of Ontario mandate issued to Ontario employers.

VECC-6

Ref: Appendix D Terms of Reference

- a) Please provide the original Terms of Reference for the Pay Equity Committee.
- b) Please explain how the Terms of Reference dated September 17, 2012 for the Pay Equity Committee differ from the original Terms of Reference.

VECC-7

Ref: Appendix E Detailed Pay Equity Adjustment Calculations by Position

Please update Appendix E for 2017 year-end actuals.

Application for a Deferral and Variance Account

VECC-8

Ref: Application Page 1

- a) Is HHHI aware of any other LDC applications before the OEB where the applicant requested approval to remedy a prior error in rates related to an understatement in the calculation of depreciation expense. If yes, please provide.
- b) Please provide forecast and actual ROE for each of the years 2012 to 2017 and the forecast for 2018.