March 23, 2018

VIA E-MAIL

Mr. M. McCallum
CFO Westario Power Inc.

Dear Mr. McCallum:

> **Re:** **EB-2017-0084 –Westario Power Inc.**
> **Interrogatories of Vulnerable Energy Consumers Coalition (VECC)**

Please find attached clarification questions following the interrogatory responses of Westario Power Inc. While the Board has not made provision for supplementary interrogatories, early responses to these questions will help VECC more efficiently prepare for the upcoming Settlement Conference. As we continue to analyse the interrogatory responses we may have further questions which, if necessary, will be raised at the time of the Conference.

We have numbered these supplementary questions to follow VECC's initial interrogatories as, subject to our future discussions, we may seek to have your response filed as part of the record in this proceeding.

Yours truly,

M. Garner

Consultant for VECC

Malcolm McCallum, CFO Westario: Malcolm.mccallum@westario.com
Michael Buonaguro, Counsel: mrb@mrb-law.com
Intervenors EB-2017-0084
Ontario Energy Board

M. Garner & B. Harper

REQUESTOR NAME	VECC
INFORMATION REQUEST ROUND:	# 2 Pre-ADR Clarification
TO:	Westario Power Inc. (WPI)
DATE:	March 23, 2018
CASE NO:	EB-2017-0084
APPLICATION NAME	2018 COS Application

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(Note: Numbering consecutive to VECC's IRs)

VECC – 44

Reference: Exhibit 3, IR Responses, pages 4-5
Revised Load Forecast Model, Final CDM Adjusted Forecast Tab

a) It is noted that the revised 2018 forecast customer count set out in the preface to the Exhibit 3 IR responses differs from that in the revised load forecast model. Please indicate which is the basis for WPI's updated Application.

VECC – 45

Reference: Revised Load Forecast Model, Input-Customer Data Tab

a) Please provide an explanation as to why, in the revised Load Forecast, the GS<50 customer count is reduced from that forecast using the geomean (2,599) to 2,583.

VECC – 46

Reference: Staff 43 d)
VECC 13 c)

a) Both of these IRs requested for the basis for the forecast CPI values used in the load forecast model. Please provide.

VECC – 47

Reference: Revised Load Forecast Model, Input-Adjustments and Variables Tab
VECC 12

a) The revised load forecast removes the Holiday Inn Usage from the purchased energy values for purposes of estimating the regression model. However, shouldn't the Holiday Inn load subsequently be added back in for purposes of determining the overall load forecast for 2018? If so, it is not clear where/how this is done in the load forecast model.

VECC – 48

Reference: VECC 17

    a) A copy of WPI's most recently approved 2015-2020 CDM Plan does not appear to have been provided with the IR response. Please provide.

VECC – 49

Reference: Staff 47

    a) The total 2016 CDM savings used in Staff 47 (5,901,234 kWh) does not match that reported by the IESO in its verified results report (3,071,071 kWh). Please reconcile.

VECC – 50

Reference: Staff 49
                  Exhibit 3, IR Responses, page 7

    a) The derivation of the allocation of the LRAMVA threshold to customer classes includes verified 2015 results. However, 2015 results were not included in the determination of the proposed LRAMVA threshold. Please reconcile.

    b) The 2016 verified savings by customer class used in Staff 49 sum to an amount that exceeds the total verified savings for 2016. Please reconcile.

    c) The 2017 and 2018 savings values used in Staff 49 don't equal those used in the determination of the LRAMVA threshold. Please reconcile.

    d) The total LRAMVA threshold as set out in the Load Forecast Model does not match that provided in Staff 49. Please reconcile.

VECC – 51

Reference: Staff 50 b)
              VECC 22 b)

    a) Both IRs requested the 2017 actual Other Revenues. However, the values provided in the two responses differ (see accounts 4220 and 4245). Please reconcile.

VECC – 52

Reference: VECC 22 e)
    a) VECC 22 e) asked for an update on the expected Loss from Retirement of Utility and Other Property in 2018 ($140,000). Please expand on the response provided and indicate what the basis for the expected loss is.

VECC – 53

Reference: Staff 86

   a) VECC is unable to reconcile the CDM saving values used in the LRAMVA Work Form for 2011, 2013 and 2014 CDM programs with the results reported by the IESO. Please review.

VECC – 54

Reference: Staff 77 c)

   a) Staff 77 c) indicates the analysis was based on 2017 data. However, the customer counts used are for 2016. Please reconcile.

   b) The analysis includes Bad Debt expense. Please explain why since Bad Debt expense is allocated separately in the cost allocation model.

   c) Why are collection charges allocated based on Bad Debt expense? Does WPI track collection costs by customer class?

VECC – 55

Reference: Staff 78 and 79

   a) Please explain why, in Tab I6.2 of the Cost Allocation model, the GS>50 customer count for secondary is greater than that for transformers.

VECC – 56

Reference: Updated RRWF, Tab 13 – Rate Design

   a) Please confirm for which classes the monthly service charge is based on the fixed-variable split using the 2018 load forecast and 2017 rates.

VECC – 57

Reference: VECC 41
             Revised Appendix 2-R

   a) The loss factor calculation set out in VECC 41 yields a result of 7.19% whereas the value provided in the revised Appendix 2-R is 7.13%. Please reconcile.

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