Ontario

Ontario Energy Board
Commission de l’énergie de l’Ontario

DECISION ON ISSUES LIST AND APPEAL

EB-2017-0038

ERIE THAMES POWERLINES CORPORATION

Application for electricity distribution rates and other charges beginning May 1, 2018

BEFORE: Ken Quesnelle
Presiding Member

Lynne Anderson
Member

Michael Janigan
Member

August 9, 2018

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1 INTRODUCTION AND SUMMARY

Erie Thames Powerlines Corporation (ETPL) filed a cost of service application with the Ontario Energy Board (OEB) on September 15, 2017 under section 78 of the *Ontario Energy Board Act, 1998*, seeking approval for changes to the rates that ETPL charges for electricity distribution, to be effective May 1, 2018. ETPL's application is being considered under the OEB's proportionate review approach. The proportionate review process is intended to allow for a streamlined hearing of applications where it is appropriate.

In June 2018, the OEB issued its Decision on Scope of Review (Scoping Decision), which set out the issues that are to proceed to hearing and provided parties with the opportunity to propose additions to certain parts of the issues list. The Vulnerable Energy Consumers Coalition (VECC) was the only party to make a submission.

OEB staff and ETPL filed reply arguments that addressed the submissions of VECC. OEB staff supported some, but not all, of VECC's proposed additions. ETPL's reply raised concerns that VECC seeks to introduce issues that are not relevant to this application, but rather relate to ETPL's proposed amalgamation with West Coast Huron Energy Inc.[1] (the MAADs application). ETPL further sought confirmation from the OEB that issues related to the MAADs application are beyond the scope of this proceeding.

The OEB agrees with ETPL that the implications of the MAADs application are out of scope of this proceeding, for reasons described further below.

Having considered the submissions of the parties, the Scoping Decision and the evidentiary record, the OEB has established a Final Issues List attached as Schedule A.

The OEB approves the addition of the following VECC sub-issues:

- #V1-1 modified
- #V2-1
- #V3-1
- #V3-2
- #V4-2

[1] EB-2018-0082

In the OEB's view, these additional sub-issues help focus the scope of this proceeding, identify areas that require further discovery, and are not overly duplicative of already existing issues.

The OEB also grants the relief requested by Toyota Motor Manufacturing Canada Inc. (Toyota) in its appeal and approves Toyota as an intervenor in this proceeding, for reasons described further below.

2 ISSUES LIST

2.1 Background

In the Scoping Decision, the OEB determined that the following six issues would proceed to a full hearing process, including an opportunity for discovery:

1. Rate Base
2. Distribution System Plan (DSP) and Capital Expenditures
3. Operating Costs
4. Cost of Long-Term Debt, but not other areas of Cost of Capital
5. Cost Allocation: Revenue-to-cost ratios and standby rate proposal
6. Deferral and Variance Accounts, except Lost Revenue Adjustment Mechanism Variance Account (LRAMVA)

In the Scoping Decision, the OEB determined that the following four issues would proceed to an abridged hearing process, which will consist of an opportunity for written submissions:

7. Load Forecast and Other Revenue
8. Revenue Sufficiency/Deficiency
9. Cost Allocation: Other than areas noted for full hearing above
10. Rate Design: restricted to Bill Impacts for the Sentinel Lighting class, and any rate design effects that may result from the hearing of other issue

The Scoping Decision further stated that the OEB may permit further refinement of the issues on the Issues List.[2] Procedural Order No. 1, issued on July 19, 2018, set out steps for parties to make submissions on the Issues List regarding additional sub-issues. The OEB also stated that the Final Issues List would inform the scope of interrogatories in this proceeding.

VECC's proposed additions to the Issues List relate to the six issues that are to proceed to a full hearing process. The OEB's findings with respect to each of VECC's proposed additions are set out below.

[2] EB-2017-0038 Decision on Scope of Review, June 8, 2018, page 3

2.2 Issues List #1 Rate Base

VECC proposed the following additional sub-issue #V1-1:

1. Were the additions to rate base since the last rebasing of 2012 prudent?

In response, OEB staff submitted that the proposed additional VECC sub-issue #V1-1 is not required, as it is subsumed under the general rate base issue.[3]

ETPL also disagreed with the addition of this issue arguing that VECC is attempting to revisit the capital spending of prior years and the rate base opening balances, which is a collateral attack on the Scoping Decision. ETPL also expressed the view that expanding this issue does not provide value in the review process, as there is a muted impact of historical capital spending on rates, compared to OM&A spending in the test year.

Findings

The OEB finds that a modified version of VECC sub-issue #V1-1 should be included in a sub-issue in the Final Issues List.

The OEB finds that the capital additions to rate base since 2012 are relevant to the consideration of the effectiveness of ETPL's planning and how it executes that plan. This sub-issue is therefore more appropriate to be grouped as a sub-issue under Issues List #2, DSP and Capital Expenditures. This sub-issue has been amended to make clear that it relates to the assessment of historical spending practices against planned spending to inform forecasted spending levels, as outlined in the DSP.

The revised issue is as follows:

Do the capital additions to rate base since the last rebasing of 2012 inform the assessment of the planned capital for 2018 to 2022?

[3] Issues List #1 Rate Base General Issue: Is the rate base element of the revenue requirement reasonable, and has it been appropriately determined in accordance with OEB policies and practices?

2.3 Issues List #2 DSP and Capital Expenditures

VECC proposed the following two additional sub-issues #V2-1 and #V2-2:

1. Is the proposed increase in system renewal capital spending for the 2018 to 2022 period prudent in light of the lower average spending in this category over the previous 5 year period?

2. Does the proposed DSP properly pace capital investments?

OEB staff supported the addition of #V2-1, but not #V2-2. In OEB staff's view, #V2-1 should be added, as it identifies a specific sub-issue under the more general DSP and capital expenditures issue[4] already included in the Issues List and could benefit from further discovery. Concerning #V2-2, OEB staff argued that this is unnecessary, as it is covered by the general DSP and capital expenditures issue.[5]

As noted above, ETPL submitted that VECC is attempting to revisit the capital spending of prior years, which is contrary to the Scoping Decision.

Findings

The OEB agrees with OEB staff's submission that VECC sub-issue #V2-1 should be added because it identifies a specific sub-issue that could benefit from further discovery.

The OEB also agrees with OEB staff's submission that VECC sub-issue #V2-2 does not need to be added as this sub-issue is subsumed within the general DSP and capital expenditures issue, which includes the pacing of capital expenditures.

2.4 Issues List #3 Operating Costs

VECC proposed the following additional sub-issues #V3-1 and #V3-2:

1. Did the underspending in operating costs for the period 2012, 2013 and 2015 from that approved by the Board in 2012 result in any deferred costs that are proposed to be recovered in 2018 onward?

[4] Issues List #2 DSP and Capital Expenditures General Issue: Are ETPL's proposed capital expenditures appropriate and have the trade-offs with the proposed level of Operating Costs been given adequate consideration?
[5] Ibid

2. Is the increase in compensation both the increase in costs and the reduction in non-management positions and increase in management positions reasonable?

OEB staff submitted that VECC sub-issues #V3-1 and #V3-2 should be added, as these sub-issues could benefit from further discovery. In addition, OEB staff recommended that sub-issue #V3-1 be modified to replace the reference to the year “2015” with “2014” as this would take into account the periods when ETPL underspent operating costs.

Findings

The OEB agrees with OEB staff’s submission that VECC sub-issues #V3-1 and #V3-2 could benefit from further discovery and, therefore, should be added to the Final Issues List. The OEB also approves the modification of sub-issue #V3-1 to replace the reference to the year “2015” with “2014” as proposed by OEB staff.

2.5 Issues List #4 Cost of Long-Term Debt

VECC proposed the following additional sub-issues #V4-1, #V4-2, and #V4-3:

1. Is the variance between ETPL’s actual and notional capital structure reasonable?

2. Does ETPL’s policy of borrowing 100% of its long-term debt at above market rates pose any risk to the regulated utility that might have consequences on ratepayers?

3. Has ETPL undertaken sufficient due diligence with respect to services provided by affiliated companies to ensure that ratepayers are paying market based prices for these services?

OEB staff supported the addition of #V4-2 only. In OEB staff’s view, #V4-2 raises a sub-issue that is related to Issues List sub-issue 4a)[6] and could benefit from further discovery.

OEB staff submitted that VECC sub-issue #V4-1 should not be included, as the actual capital structure is not used to generate the OEB-approved capital structure.

[6] Issues List #4a Cost of Long-Term Debt: ETPL’s use of the OEB’s deemed long term debt rate of 4.16 percent appropriate for the 2017 and 2018 promissory notes due to ERTH Corporation, an affiliate of ETPL, which have rates of 2.5 percent?

OEB staff submitted that VECC sub-issue #V4-3 should not be included, as it is covered by Issues List sub-issue 3g).[7] Moreover, OEB staff submitted that if its inclusion is approved by the OEB, VECC sub-issue #V4-3 more properly belongs under Issue #3 Operating Costs, instead of Issue #4 Cost of Long-Term Debt.

ETPL's argument on these issues was more general in nature. ETPL has concerns that VECC seeks to expand the long-term debt issue beyond that which is provided for in the Scoping Decision. ETPL noted that the requested rate to be recovered is priced in the application at the OEB's approved long-term debt rate for affiliate debt. ETPL indicated that the OEB has repeatedly applied the deemed capital structure, even when there is a variance from the actual capital structure. Given prior OEB policies and practice, in ETPL's view, there is no benefit from granting VECC's request.

Findings

The OEB finds that VECC sub-issue #V4-1 should not be included in a sub-issue in the Final Issues List, as the actual capital structure is not used to generate the OEB-approved capital structure.

The OEB finds that VECC sub-issue #V4-2 should be included as a sub-issue in the Final Issues List. The OEB notes that #V4-2 raises a sub-issue that is related to Issues List sub-issue 4a) and could benefit from further discovery.

The OEB finds that VECC sub-issue #V4-3 is covered by Issues List sub-issue 3g) and does not need to be added. However, the OEB amends sub-issue 3g) to better reflect the reasoning contained in the Scoping Decision which intended for this issue to cover affiliate transactions (i.e. costs and revenues).

The approved issue is as follows:

Are affiliate transactions forecast by ETPL appropriate and, if so, why?

2.6 Issues List #7 Cost Allocation

VECC proposed the following additional sub-issue #V7-1:

[7] Issues List Sub-Issue #3g Operating Costs: Are the portions of affiliate costs allocated to ETPL appropriate and, if so, why?

1. Are the proposed changes from the approved 2012 cost allocation, and which underlie the revised revenue-to-cost-ratios reasonable?

OEB staff submitted that VECC sub-issue #V7-1 should not be included, as it is covered by Issues List sub-issue 7a).[8]

Findings

The OEB agrees that VECC sub-issue #V7-1 is already covered by sub-issue 7a) and does not need to be added to the Final Issues List.

2.7 Issues List #9 Deferral and Variance Accounts

VECC proposed the following additional sub-issue #V9-1:

1. Are the balances proposed for disposition in accounts 1508 (IFRS Transition), 1568 (LRAM), 1575 and 1576 (IFRS Transition) reasonable?

OEB staff submitted that VECC sub-issue #V9-1 should not be included as, save one exception, it is already covered by Issues List sub-issue 9b).[9] The one exception, Account 1568, LRAMVA, is not a Group Two account and therefore would not be covered by Issues List sub-issue 9b). However, OEB staff argued that the Scoping Decision had already determined that there is no need for any further discovery of the Account 1568 LRAMVA balance and therefore this account does not need to be added to the Issues List.

Findings

The OEB finds that, except for Account 1568 LRAMVA, VECC sub-issue #V9-1 is already covered by sub-issue 9b). As a result, this proposed sub-issue does not need to be added in the Final Issues List.

[8] Issues List Sub-Issue #7a Cost Allocation: Are ETPL's proposed revenue-to-cost ratios appropriate, particularly given the shifts in the revenue-to-cost ratios produced in the cost allocation model from the previously approved ratios in 2012 to the status quo ratios, which are used to derive the proposed ratios in this application?
[9] Issues List Sub-Issue #9b Deferral and Variance Accounts: Are ETPL's proposals for disposition of Group Two accounts appropriate including the claim for IFRS transition costs and the calculation of the Account 1576 balance?

In terms of Account 1568, LRAMVA, the OEB notes that the Scoping Decision previously found that this account did not require further scrutiny. It is important to note that this account is more mechanistic in nature and is typically reviewed with Group 1 deferral and variance accounts for which cost awards are not typically granted. Moreover, based upon the OEB staff's previous review of this account in preparing its recommendation for the streaming of this application, no problems were identified that required further examination by the OEB.

2.8 Relevance of MAADs application

In its submission, VECC raised concerns about the impact that this application may have given the pending MAADs application. In VECC's view, the OEB should provide considerable leeway for parties to critically test ETPL's proposals given that the rates set in this proceeding would, assuming the MAADs application is successful, underpin ETPL's rates for nine years.

ETPL has concerns that VECC wishes to bring issues of the MAADs application into this rate proceeding. ETPL noted that its 2018 cost of service rate application was submitted as a stand-alone application 11 months ago, and prior to the submission of the MAADs application.

ETPL asked the OEB to disallow VECC's request for an expanded leeway, as well as deny the commingling of issues between this rate application and the MAADs application. ETPL requested that the OEB confirm that issues related to the MAADs application and proposed amalgamation are beyond the scope of this proceeding.

Findings

The OEB reminds parties that the issues relevant to this proceeding are defined by the Final Issues List. Parties are to limit their written interrogatories to questions relevant to the Final Issues List. The setting of just and reasonable rates in this proceeding is not modified by considerations of what might eventuate in a future MAADs decision. The OEB finds that potential cost savings arising from the proposed amalgamation of ETPL with West Coast Huron Energy Inc., are outside the scope of this proceeding.[10]

[10] The OEB notes a prior OEB decision regarding the relevance of MAADs applications on a custom incentive rate (custom IR) application. In particular, the OEB references page 8 of the EB-2015-0003 October 6, 2015 Decision on Threshold Question and Procedural Order No. 5 for PowerStream Inc. In this precedent, the OEB ruled that evidence on potential cost savings due to the merger was outside the scope of the custom IR PowerStream Inc. proceeding.

3 APPEAL

In Procedural Order No. 1, the Associate Registrar of the OEB denied Toyota's request for intervenor status on the basis that Toyota did not have a "substantial interest" in this proceeding. On August 1, 2018, Toyota filed a Notice of Appeal requesting an order varying Procedural Order No. 1 and granting Toyota intervenor status in this proceeding In its Notice, Toyota explained that (i) if granted intervenor status, Toyota would bring a unique perspective as a large load industrial customer with a significant load displacement generation facility, a perspective that does not appear to be represented amongst the current intervenors; (ii) it has concerns that there be a level playing field in relation to similarly situated competitors who are connected to other distribution systems; (iii) this proceeding may set a precedent for the current Energy+ proceeding in relation to the standby rate (Toyota requested and was granted intervenor status in that proceeding); and (iv) there will be no cost or scheduling impact from Toyota's participation.

Findings

The OEB grants Toyota's appeal and approves Toyota as an intervenor without cost awards on the basis of the supplementary information provided in its Notice of Appeal. Attached as Schedule B is an updated list of parties to this proceeding.

While Toyota is not a customer of ETPL and therefore would not normally be considered to have a substantial interest in this proceeding, the OEB is satisfied that Toyota has a unique - and otherwise unrepresented - perspective as a large industrial load with displacement generation on the issues it is pursuing (the standby rate issue and the gross load billing issue). Toyota may contribute to the OEB's understanding of this issue from a customer's perspective.

Toyota is required to accept the record as it stands and to comply with the existing timelines set out in Procedural Order No. 1, including the August 14, 2018 deadline for filing any written interrogatories.

4 CONCLUSION

The Final Issues List is attached as Schedule A to this Decision and reflects the OEB's decision based on input from VECC, ETPL, and OEB staff.

The OEB further grants Toyota's appeal and approves Toyota as an intervenor in this proceeding.

DATED at Toronto, **August 9, 2018**

ONTARIO ENERGY BOARD

Original Signed By

Kirsten Walli
Board Secretary

SCHEDULE A

FINAL ISSUES LIST

ERIE THAMES POWERLINES CORPORATION

2018 DISTRBUTION RATES

EB-2017-0038

AUGUST 9, 2018

Schedule A
Final Issues List
Erie Thames Powerlines Corporation
EB-2017-0038

1) Rate Base

Is the rate base element of the revenue requirement reasonable, and has it been appropriately determined in accordance with OEB policies and practices?

This issue includes:

a) Has ETPL adequately addressed any discrepancies that could affect opening rate base?

b) Has ETPL adequately addressed any impacts to ETPL's proposed net book value from the removal of fully amortized assets?

c) Has ETPL adequately addressed its allocation of material burden since 2013?

d) Is ETPL's accounting treatment of customer contributions correct?

2) Distribution System Plan (DSP) and Capital Expenditures

Are ETPL's proposed capital expenditures appropriate and have the trade-offs with the proposed level of Operating Costs been given adequate consideration?

This issue includes:

a) Is the extent of ETPL's contribution to and need for Hydro One related projects tentatively scheduled beyond 2019 in Norwich, Mitchell and Beachville adequately justified?

b) Has ETPL provided adequate support for its conclusion that a number of capital investments will result in increased efficiency?

c) Has ETPL adequately explained and justified the reasons for and the impact of the two-year lag for Asset Condition Assessment (ACA) and Asset Management Plan (AMP) information, which is current as of January 2015 on the DSP?

d) As ETPL is having to manually lower the recommended renewal spending levels, is this an indication that the ACA and AMP may not be properly timed or misapplied?

e) Has ETPL provided sufficient information as to the means which it uses to assess data accuracy?

f) Has ETPL provided an adequate explanation for the worsening scorecard trend for the measure "Average Number of Hours that Power to a Customer is Interrupted?"

g) Has ETPL provided an adequate explanation as to why its per km costs are in the highest quartile of LDC per km costs?

h) Has ETPL adequately justified the appropriateness of its approach to investment decisions?

i) Has ETPL provided appropriate justification for its proposed pole replacement program?

j) Has ETPL provided an appropriate estimation of the value of lost useful life of assets in its voltage conversion programs as these projects are primarily completed in conjunction with system renewal type projects?

k) Has ETPL provided sufficient evidence as to the meaning of and appropriate use of heat maps, which are used by ETPL to prioritize capital expenditures?

l) Given that ETPL's historic investment levels have resulted in acceptable reliability performance, does ETPL need to provide further support for the proposal to gradually increase capital investment levels? In third party assessments of the investment process, was the acceptable level of reliability given adequate consideration? If not should the assessment methodology used be adjusted to account for it?

m) Is the proposed increase in system renewal capital spending for the 2018 to 2022 period prudent in light of the lower average spending in this category over the previous 5 year period?

n) Do the capital additions to rate base since the last rebasing of 2012 inform the assessment of the planned capital for 2018 to 2022?

3) Operating Costs

Are ETPL's operating costs appropriate?

This issue includes:

a) Does the differential between ETPL's 2012 OEB approved level of OM&A of $5,660,594 and actual OM&A costs of $4,855,139, or $805,455, or 17 percent, raise concerns about the accuracy of ETPL's current forecast?

b) Is ETPL's conclusion that it is clearly performing well when compared to its expected cost calculation justified?

c) Is ETPL's inclusion of $140,000 in operating costs for cyber and privacy risk mitigation appropriate and is the classification of these costs as regulatory in nature appropriate?

d) Are the merger savings stated as arising from ETPL's previous mergers with West Perth and Clinton Power accurately quantified and reflected in the current application?

e) Are ETPL's stated FTE levels and compensation costs appropriate and/or comparable to those of other utilities given that some employees who work for ETPL are located in its affiliated companies?

f) Are the accounting changes which have shifted costs away from O&M and into Administration appropriate?

g) Are affiliate transactions forecast by ETPL appropriate and, if so, why?

h) Are ETPL's purchases of non-affiliate services resulting in appropriate costs and are the divisions of service acquisitions between affiliates and non-affiliates appropriate?

i) Is ETPL's proposal to establish a five-year useful life for smart metering assets appropriate as this is not within the Kinectrics range?

j) Did the underspending in operating costs for the period 2012, 2013 and 2014 from that approved by the Board in 2012 result in any deferred costs that are proposed to be recovered in 2018 onward?

k) Is the increase in compensation both the increase in costs and the reduction in non-management positions and increase in management positions reasonable?

4) Cost of Long-Term Debt

a) Is ETPL's use of the OEB's deemed long term debt rate of 4.16 percent appropriate for the 2017 and 2018 promissory notes due to ERTH Corporation, an affiliate of ETPL, which have rates of 2.5 percent?

b) Has ETPL calculated interest expense appropriately for promissory notes shown as issued on the last days of 2015, 2017 and 2018 respectively?

c) Does ETPL's policy of borrowing 100% of its long-term debt at above market rates pose any risk to the regulated utility that might have consequences on ratepayers?

5) Load Forecast and Other Revenue *(written submissions only)*

a) Is ETPL's proposed Load Forecast appropriate, including the interrelationship with, and impacts of, other issues?

b) Is ETPL's proposed Other Revenue appropriate, including the interrelationship with, and impacts of, other issues?

6) Revenue Sufficiency/Deficiency *(written submissions only)*

a) Has ETPL's proposed Revenue Sufficiency/Deficiency been accurately determined, given the impacts from the hearing of other issues?

7) Cost Allocation

a) Are ETPL's proposed revenue-to-cost ratios appropriate, particularly given the shifts in the revenue-to-cost ratios produced in the cost allocation model from the previously approved ratios in 2012 to the status quo ratios, which are used to derive the proposed ratios in this application?

b) Is ETPL's proposal for a final standby rate appropriate?

c) Are any changes to ETPL's proposed cost allocation needed as a result of the hearing of other issues? *(written submissions only)*

8) Rate Design *(written submissions only)*

a) Are ETPL's proposed bill impacts related to the Sentinel Lighting rate class appropriate?

b) Are any changes to ETPL's proposed rate design needed as a result of the hearing of other issues?

9) Deferral and Variance Accounts

a) Are ETPL's proposals for the disposition of Group One accounts appropriate, including the allocation of the Global Adjustment between Regulated Price Plan (RPP) and non-RPP customers and general consistency in the continuity schedules?

b) Are ETPL's proposals for disposition of Group Two accounts appropriate including the claim for IFRS transition costs and the calculation of the Account 1576 balance?

c) Is ETPL’s request for a new variance account related to Other Post-employment Benefits (OPEBs) appropriate given that the OEB has previously established an account for such variances?

SCHEDULE B

REVISED APPLICANT AND LIST OF INTERVENORS

ERIE THAMES POWERLINES CORPORATION

2018 DISTRBUTION RATES

EB-2017-0038

AUGUST 9, 2018

Erie Thames Powerlines Corporation
EB-2017-0038

REVISED APPLICANT & LIST OF INTERVENORS

August 09, 2018

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