August 17, 2018   **VIA E-MAIL**

Mr. Andrew Belsito,
Rates and Regulatory Affairs
PUC Distribution Inc.
Sault Ste. Marie, Ontario

Dear Mr. Belsito:

> **Re: EB-2017-0071 – PUC Distribution Interrogatories**
> **VECC - Pre-Settlement Conference Clarification questions**

Please find attached clarification questions following the interrogatory responses of PUC Distribution Inc.   While the Board has not made provision for supplementary interrogatories, early responses to these questions will help us 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.

Yours truly,

M. Garner

Consultant for VECC

Email copy:

Kirsten Walli, Board Secretary, Ontario Energy Board: Boardsec@oeb.com
Mr. John Vellone: jvellone@blg.com
Intervenors

REQUESTOR NAME	VECC
TO:	PUC Distribution Inc. (PUC)
IRs	Pre-ADR VECC Clarification Questions
DATE:	August 17, 2018
CASE NO:	EB-2017-0071
APPLICATION NAME	2018 COS Application

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(Note: Numbering consecutive to VECC's IRs)

VECC – 44
Reference: 3-VECC-25
3-VECC-18
3-Staff-47
3-Staff-44 a) - Revised Load Forecast Model, Rate Class Customer Model
Tab / Exhibit 3, pages 6 & 8

a) Please confirm that:
    i.   In the original Application (page 8) the historical 2013-2016 customer counts for Street Lights are based on number of devices but the 2017-2018 values are based on number of connections (per page 6).
    ii. In VECC18, the quarterly counts shown for Street Lights are based on number of devices.

b) In the Revised Load Forecast Model, Rate Class Customer Model (Staff-44 a)) is the forecast shown for Street Lights (9,317) based on number of devices or number of connections. If based on devices, what is the corresponding forecast for the number of connections?

c) VECC #25 indicated that PUC expected there to be "little change" in the streetlight count in the upcoming years. However, the response to VECC #18 shows an increase in the count during 2017. What was the reason for the increase?

d) What is the customer/connection count for each customer class for the latest month in 2018 for which data is available? In the case of Street Lights, please provide both the connections and devices counts.

VECC – 45

Reference: 4-Staff 68 - Attachments
3-VECC-22
Exhibit 3, page 13, Table 3-6
http://www.ieso.ca/en/sector-participants/conservation-delivery-and-tools/conservation-targets-and-results

a) The files provided in response to Staff-68 do not appear to include any reports from the IESO/OPA supporting the values used in Table 3-6 for the persisting (i.e., post 2010) impacts of 2006-2010 programs as requested in VECC-22 a). Please provide.

b) VECC has been unable to reconcile the values provided in VECC-22 regarding the initial and persisting impacts of 2011-2013 CDM programs with the values provided in the files submitted in response to Staff-68 (specifically the 2011-2014 Results Report and the 2011-2013 Persistence Report). Please review and provide reconciliation. (Note: The values provided in response to VECC-22 for 2011-2013 programs do not match the values in the LRAMVA Workform – either the original Workform or the one provide with the IR responses).

c) Please provide an updated response to VECC-22 that includes: i) any corrections arising from the response to part (b); ii) the impact of 2017 CDM programs based on the verified results released earlier this year by the IESO and iii) any adjustments required to pre-2017 results as a reported in the 2017 Verified Results Report.

VECC – 46

Reference: 3-VECC-26
Appendix 2-I (Original Application)
Appendix 2-I (Filed with IR Responses)

a) The response to VECC-26 does not provide the basis for the total CDM savings forecast from either 2017 or 2018 CDM programs as used in the manual adjustment to the load forecast. Furthermore, the values used in the Application do not match those in the CDM Plan provided (VECC-26 b)). Please explain how the basis for the total CDM forecasts for 2017 and 2018 CDM programs.

b) Appendix 2-I does not appear to have been updated to reflect the updated load forecast (per Staff-44). Please provide an update and specifically indicate what the proposed LRAMVA threshold is.

VECC – 47

Reference: 3-Staff 44 a) - Revised Load Forecast Model, Purchased Power Model
Tab and Purchased Power Model – WN Tab
3-VECC-24
3-Staff-45 b)

a) Please confirm that for the Revised Load Forecast Model:
  i. The regression model itself (per Purchased Power Model Tab) was not re-estimated to include 2017 actual data.
  ii. For the updated forecasts for 2017 and 2018 (per Purchased Power Model WN Tab):
    o The weather normal values for HDD and CDD were calculated using 2008-2017 data. If not, confirmed please clarify what values were used.
    o The 2017 and 2018 values for the customer counts variable were revised to reflect the updated forecast. If not confirmed, please clarify what values were used.
    o The CDM values used for the results from 2006-2016 CDM programs were not revised from those used in the original forecast. If not confirmed, please indicate how the values were adjusted and on what basis.
    o The CDM values used for the results from 2017 CDM programs were not revised from those used in the manual adjustment to the original forecast and do not reflect the actual verified results for 2017 as released by the IESO earlier this year. If not confirmed, please indicate how the values were adjusted and on what basis.
    o The Street Lights adjustment was revised to reflect 2017 usage. If not confirmed, please clarify the basis for the Street Lights adjustment used.

b) Please provide a revised Load Forecast model where the Purchased Power regression model is estimated using actual data for 2017 and with CDM historical data that reflects the revised response to VECC-22 as requested in VECC 45 c) above.

c) Please re-do the response to VECC-24 but: i) include actual 2017 data in the model estimation and ii) also include a trend variable (per Staff-45 b))

VECC – 48
Reference: 3-Staff-48
PUC's August 17, 2018 Interrogatory Response Corrections

a) Was the only change made to the 2018 forecast for Account 4210 due to the Board's direction to increase the pole attachment charge as of September 2018?

VECC – 49
Reference: Updated Cost Allocation Model (filed with IR Responses)
Updated Cost Allocation Model (filed August 17, 2018)
7-Staff-75

a) With respect to Tab I6.2, please reconcile the number of customers shown here for USL (22 per Row 21) with the number (23) shown for the USL primary, line transformer and secondary customer base.
b) With respect to Staff-75, for the Services Weights why is the cost per connection for GS<50 UG less than for GS<50 OH when the opposite is the case for Residential and GS>50?
c) With respect to Tab I8, it appears that the load profiles in the updated models were not updated for the revised load forecast (per Staff-44). Please confirm whether or not this is the case and update the Cost Allocation model as required.

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