

September 10, 2018

VIA COURIER & RESS FILING

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th Floor, Box 2319
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Erie Thames Powerlines Corporation (“Erie Thames”);
2018 Cost of Service Application; Clarification Interrogatories
Board File No.: EB-2017-0038**

We are writing on behalf of Toyota Motor Manufacturing Canada Inc. (“**TMMC**”) to file Clarification Interrogatories to Erie Thames.

Yours very truly,

Dentons Canada LLP

Original signed by Helen T. Newland

Helen T. Newland

HTN/ko

Encls.

cc: Melody Collis, TMMC
Bill Fantin, TMMC
Pete Leonard, TMMC
Jo Keaton, TMNA
Graig Pettit, Erie Thames
Scott Stoll, Aird & Berlis
Parties to EB-2017-0038

Clarification Questions

Toyota Motor Manufacturing Canada Inc.

to

Erie Thames Powerlines Corporation

EB-2017-0038

September 10, 2018

Clarification Toyota-1

Reference: Toyota IR-1

Preamble: In its response to Toyota IR-1, Questions 1&2, ETPL referred to “the network and connection charges charged by the IESO or Hydro One” [emphasis ours] as elements of the “distribution variable charge”.

Questions:

1. Please confirm that the reference should instead have been to Retail Transmission Rates (both Network and Connection Service) charged by ETPL to its retail customers.

Clarification Toyota-2

Reference: Toyota IR-2 Question 5

Preamble: In its response to Toyota IR-2, Question 5, ETPL indicates that the 160,938 kW volume from the cost allocation model is ETPL’s current expected load *excluding* behind the meter generation. ETPL then states that additional revenue (i.e. that is not currently included in the forecast) will not be earned as a result of the standby charge.

The above two elements of the response appear to be contradictory. If the 160,938 kW volume excludes demand met by behind the meter generation, then applying distribution variable charges to such generation should lead to additional revenue that hasn’t been taken into account in the model. (This conclusion assumes that some behind the meter generation will be in place during the forecast period.)

Questions:

1. Please clarify the rationale for ETPL’s conclusion that no additional revenue will result that is not included in the forecast.

Clarification Toyota-3

Topic: Standby Rate Proposal

Reference: VECC-36(d)

Preamble: In its response to the three questions under VECC-36(d), ETPL simply responded “NA”.

Questions:

1. Please confirm that “NA” means “Not Applicable”. If it means something else, please indicate what “NA” means.

2. If the answer to Question 1 above is that “NA” means “Not Applicable”, is this because:
(a) ETPL does not propose to alter the billing determinants as posited in the preamble to the questions, or (b) there was no “self-generation” in the period 2012-2016 and will be no self-generation in the forecast period 2017-2018?
3. Whatever the responses to Clarification Questions 1 and 2 above, please provide the data on billing determinants as originally requested by VECC in its Question 36(d).

Clarification Toyota-4

Topic: Standby Rate Proposal

Reference: Toyota IR-4

Preamble: ETPL’s response indicates that the two referenced values should be the same, but does not indicate which of the values noted is the correct value.

Questions:

1. Please indicate which of the two values noted is correct.

Clarification Toyota-5

Topic: Standby Rate Proposal

Reference: Toyota IR-6

Preamble: ETPL’s response indicates that the two referenced values should be the same, but does not indicate which of the values noted is the correct value.

Questions:

1. Please indicate which of the two values noted is correct.