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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: Energy+ Inc. ("Energy+") 2019 Cost of Service Application; Board File No.: EB-2018-0028 ;Request For Extension of Time

We are writing on behalf of Toyota Motor Manufacturing Canada Inc. ("**TMMC**") and as a follow up to our letter of Monday, September 17, 2018 to request that the Ontario Energy Board ("**Board**") amend the prescribed date for the receipt of intervenor written evidence from September 24, 2018 to September 27, 2018. As mentioned in our earlier letter, Energy+ has updated its cost of service/cost allocation models to reflect changes that it proposes to make to its application as a result of responding to various interrogatories, including updating for 2017 actual data. It is taking TMMC some time to work through the various changes and assess how they affect Energy+'s standby rate proposal and, thus, TMMC's written evidence.

Compounding this issue is the fact that due to the administrative errors referred to in Energy+'s counsel's letter of September 18, 2018, TMMC did not receive the revised cost of service/cost allocation model until Monday, September 17, 2018. (Energy+ did provide TMMC's counsel and experts with unredacted responses to TMMC's interrogatories on Friday, September 14, 2018 but these did not include the revised models and associated work forms). As of today's date, TMMC was still trying to ascertain whether the two cost allocation models that are posted in the Board's web-drawer … EnergyPlus_Cost_ Allocation_Model 7 Staff 76 b_20140914 and 2019 EnergyPlus_Cost_Allocation_Model 7 Staff 76 b_20180914 … are different exhibits or duplicates. We are now advised that they are, in fact, duplicates and the web-drawer will be adjusted accordingly. We continue to work with Board Staff to resolve other instances of apparent (but not confirmed) duplications.

As we stated in our September 17th letter, TMMC shares Energy+'s desire to avoid undue delays in the Board's procedural schedule. (Energy+'s September 18th letter from counsel implies that there have already been delays in the procedural schedule. We are not aware of any such delays since Procedural Order No. 1 was issued on July 26, 2018) While the short extension of time that we are requesting is justified and is necessary to allow TMMC some time to consider Energy+'s revised and new evidence, it should not necessitate a revision to the balance of the schedule.

Finally, we would like to address the issue of the four additional interrogatories that TMMC sent to Energy+ on Monday, September 17th . One such interrogatory (Clarification TMMC-1) asked for a copy of the revised cost allocation model, as well as the work forms referred to in OEB Staff Interrogatories “1 Staff 2” and “7 Staff 76”. It also asked for copies of any other models that had been affected by the revisions to the cost allocation model. TMMC Clarification-2 asked for copies of documents and calculations underpinning the changes that Energy+ has made to the proposed Standby Charge (i.e., change in the contract demand) and the associated revenue requirement for the Large User Class. Clarifications TMMC-3 and 4 were follow ups to Energy+’s response to previous interrogatories from TMMC. We have, this afternoon, received Energy+’s responses to the Clarification Interrogatories.

TMMC has one further confirmatory interrogatory that seeks to clarify Energy+’s response to TMMC-11. TMMC requires response to this question in order to finalize its written evidence and would appreciate Energy+’s cooperation in this regard. The five (in total) clarification interrogatories are attached.

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
John Vellone
Sarah Hughes.
Parties to EB-2018-0028

Clarification Questions

Toyota Motor Manufacturing Canada Inc. (“TMMC”)

to

Energy+ Inc. (“Energy+”)

EB-2018-0028

Questions Sent to Energy+ on Monday, September 17, 2018

Clarification TMMC-1

Reference: **Energy+ Response to IR-TMMC-4**

Preamble: In the preamble of its response to IR-TMMC-4, Energy+ indicates that it has updated its cost allocation models to incorporate charges to the application made as a result of responding to interrogatories from various parties. One significant change was to update the contract capacity value of the standby tariff for TMMC from 28.8 MW to 26.2 MW. However, no update to the cost allocation model currently appears on the OEB website.

Questions:

1. Provide an update to the cost allocation model (i.e. an update to the original file named "EnergyPlus_2019 Cost_Allocation_Model_20180430") that reflects the changes noted above. Please also provide updates to any other models that have been impacted by the changes noted above, to the extent that these models have not already been provided.

2. Provide the file named "2019_Energy+_Rev_Reqt_Work_Form_1 Staff 2" that is referenced in Energy+'s response to interrogatory 1-Staff-2.

3. Provide the file named "2019 EnergyPlus_Cost_Allocation_Model 7 Staff 76b.xlsm" that is referenced in Energy+'s response to question (b) of interrogatory 7-Staff-76.

Clarification TMMC-2

Reference: **Energy+ Response to IR -TMMC-4, Sub-Question 3**

Preamble: In its response to IR-TMMC-4, Sub-Question 3, Energy+ indicates that the quantum of incremental costs allocated to the Large User Class as a result of the adjustments noted in the response to Sub-Question 1 is $33,385. However, Energy+ then also states that there is no difference in the revenue requirement for rate design purposes for the Large User Class as a result of the Standby Charge proposal. Energy+ references a calculation of the revenue that would be achieved without the Standby tariff; this calculation is based on increasing current rates by the 2019 Energy+ distribution rate increase (of 3.3%).

Energy+ also indicates that the difference in annual charges paid by TMMC between "No Standby and Standby" is $10,127.

Questions:

1. Provide copies of all associated Excel files and any other calculations that were used to support the statements above and the associated cost figures presented.

Clarification TMMC-3

Topic: Standby Rate Proposal

Reference: **Energy+ Response to IR-TMMC-12**

Preamble: In its response to IR-TMMC-12, Sub-Question 4, Energy+ indicates that it is not able to identify the specific asset values and annual depreciation expenses for the assets that are being reserved as the assets are categorized on a pooled asset basis. Therefore the asset values, net book value, and the annual depreciation expense is not specifically available.

In IR-TMMC-12, TMMC specifically requested that estimates of asset values be provided in the event that specific asset values could not be provided because of the use of "group accounting methods". Group accounting is a synonym for pooled asset accounting.

One specific asset referenced in Energy+'s response is capacity at Preston TS on the 230kV-27.6kV transformers.

Questions:

1. Please provide estimates of the asset values, net book value and depreciation expense of the assets noted as specifically requested in TMMC's original IR.

2. Please confirm our understanding that the 230kV-27.6kV transformer is an asset owned by Hydro One and therefore is not part of Energy+'s Rate Base and therefore not part of the costs that will be recovered through Energy+'s distribution tariff.

3. In light of your response to Sub-Question 2 above, please indicate why the reservation of capacity on the transformer noted above is relevant to Energy+'s request to apply for a Standby tariff.

Clarification TMMC-4

Topic: Standby Rate Proposal

Reference: **Energy+ Response to IR-TMMC-15**

Preamble: In its response to IR-TMMC-15, Sub-Question 5, Energy+ indicates that it is not able to identify the specific asset values and annual depreciation expenses for the assets that are being used by the Large User Class as the assets are categorized on a pooled asset basis. Therefore the asset values, net book value, and the annual depreciation expense is not specifically available.

In IR-TMMC-15, TMMC specifically requested that estimates of asset values be provided in the event that specific asset values could not be provided because of the use of "group accounting methods". Group accounting is a synonym for pooled asset accounting.

Questions:

1. Please provide estimates of the asset values, net book value and depreciation expense of the assets noted as specifically requested in TMMC's original IR.

New Question Not Previously Sent to Energy+

Clarification TMMC-5

Topic: Standby Rate Proposal

Reference: **Energy+ Response to IR-TMMC-11**

Preamble: In its response to Question 11, Sub-Question 1, Energy+ provided the net book value and annual depreciation expense of the assets used exclusively by TMMC. In its response to Question 15, Sub-Question 4, Energy+ provided an electric one-line diagram that shows the interconnection between the Energy+ distribution system and TMMC.

1. Is the net book value specified in response to Question 11 inclusive of all Energy+ distribution facilities shown on the electric one-line diagram?

2. If the net book value is not inclusive of all Energy+ distribution facilities, please identify what Energy+ distribution facilities are not included and explain the rationale for excluding them.

3. Provide a schedule showing the initial asset value ($670,019) separated by USoA account.