Guelph Hydro Electric Systems Inc.

OEB Staff Follow-up Questions

EB-2018-0036

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**Staff Follow up Question - 1**

**Ref: Guelph Hydro’s Response dated September 21 2018 to OEB Staff Question #2; 2019 IRM Rate Generator Model Tab 6.1a**

Guelph explained that the variance of 179,479,893 kWh pertains to the period in 2017 when the 44 Class A customers were Class B. Guelph stated that the discrepancy does not exist.

Based on Guelph’s reconciliation, the total non-RPP kWhs is 556,233,587 which agrees to Staff’s reconciliation. However, the total non-RPP kWhs of 556,233,587 is not in the cell D20 of Guelph Hydro’s 2019 IRM rate generator model Tab 6.1a GA allocation.

Question:

1. Please confirm that the cell D20 of 2019 IRM rate generator model Tab 6.1a should be the value for the total non-RPP kWhs 556,233,587. Please update the model accordingly.

**Staff Follow-up Question – 2**

**Ref: Guelph Hydro’s Response dated September 21 2018 to OEB Staff Question #6**

Guelph Hydro provided the following reconciliation between the GA costs reported in USoA 4707 and the expected GA costs as per the GA analysis workform:



Guelph Hydro further explained that the difference of $1,175,631 in the table above is related the reconciling items referenced in the GA analysis workform.

**Question:**

1. Please provide a reconciliation of the total of RPP GA cost, Class A GA costs and non-RPP class B GA costs to the IESO total GA costs of 2017 based on the monthly IESO invoices CT 148.

**Staff Follow-up Question - 3**

**Ref: Guelph Hydro’s Response dated September 21 2018 to OEB Staff Question #7**

Guelph Hydro confirmed that it has allocated 100% of the IESO invoice adjustment of ($543,557.63) to CT148 to Non-RPP class B customers. Guelph Hydro further provided two examples showing the IESO detailed adjustments on the IESO preliminary statements for April 2017 and January 2018.

Questions:

1. Please confirm whether or nor Guelph agrees that the IESO invoice adjustment to CT 148 should have been allocated into RPP and Non-RPP portions, regardless of the details of the IESO adjustments.
2. If so, please propose the adjustment(s) to allocate the IESO invoice adjustment amount of ($543,557.63) for CT 148 into RPP portion and non-RPP portions and reflect them into Accounts 1588 and 1589 respectively.
3. If not, please provide detailed rationale of why not.

**Staff Follow-up Question - 4**

**Ref: Guelph Hydro’s Response dated September 21 2018 to OEB Staff Question 10 c) and LRAMVA workform Tab 5**

It does not appear that the energy savings from the streetlighting project were reduced from the 2017 IESO retrofit program.  The IESO results indicate that 2017 incremental savings for retrofit program was 18,742,234 kWh.  The entire amount of these savings are entered in Table 5-c (cell D493 of tab 5).  As Guelph noted in its response, 114,558 kWh relate to the streetlight project.

For example, the energy savings from Veridian’s 2014 streetlighting project were reduced from the 2014 retrofit program to avoid double counting of savings.

Veridian’s case (EB-2016-0107) - Attachment D (Veridian’s LRAMVA workform, tab 4, cell G 263)

<http://www.rds.oeb.ca/HPECMWebDrawer/Record?q=CaseNumber=EB-2016-0107&sortBy=recRegisteredOn-&pageSize=400>

Questions:

1. Please confirm whether 114,558 kWh relating to the streetlight project was verified by IESO for the Jan-Dec 2017 period.
2. Please confirm whether Guelph agrees that the net of the above amounts or 18,627,676 kWh (i.e., 2017 retrofit kWh – streetlighting kWh) should be claimed.
   * If so, please update the model.
   * If not, please provide detailed rationale of why not.

**Staff Follow-up Question - 5**

**Ref: Guelph Hydro’s Response dated September 21 2018 to OEB Staff Question #11**

Guelph confirms that the conversion project was completed in Nov 2017, with savings commencing Dec 2017.  Based on the monthly pre- and post-billing data provided by Guelph, it appears that savings from Dec 2017 to July 31, 2018 have been included with the LRAMVA claim.  Since the LRAMVA claim relates to verified savings from the Jan-Dec 2017 period, Staff sees two options to proceed with claiming the streetlighting savings:

Option 1: Guelph can claim future period savings in the 2017 LRAMVA disposition, as filed, on the condition that:

* the corresponding energy savings from this streetlighting project from Jan-July 2018 will be appropriately deducted from the 2018 energy savings from the corresponding retrofit project
* for future disposition, demand savings from this streetlight project will be claimed starting in August 2018

Option 2: Guelph can defer claiming the half a year of 2018 streetlighting savings  (Jan to July 31, 2018) in a future LRAMVA claim which includes 2018 verified savings for the retrofit program.

* At that point in time, Guelph will be claiming a full year of demand savings in 2018 from the streetlighting project, and the corresponding 2018 energy savings would be taken out of the 2018 retrofit program.

Question:

Please indicate the option that Guelph proposes to choose and provide rationale for its proposal.