Filed by e-mail and posted on RESS

October 30, 2018

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Walli,

**RE: EB-2018-0243: Application by Ontario Power Generation Inc. for 2019 Hydroelectric Payment Amount Adjustment and Clearance of Deferral and Variance Account Balances**

Please find attached the interrogatories on behalf of Energy Probe Research Foundation ("Energy Probe") for the EB-2018-0243 application by Ontario Power Generation.

Respectfully submitted,

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Consultant to Energy Probe

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EB-2018-0243

# Ontario Energy Board

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sch. B, as amended;

AND IN THE MATTER OF the Application by Ontario Power Generation Inc. for 2019 Hydroelectric Payment Amount Adjustment and Clearance of Deferral and Variance Account Balances

# Interrogatories of

# Energy Probe Research Foundation

# October 30, 2018

**IR#1**

**Reference:** Exhibit F1, Tab 1, schedule 1, page 10. OPG states that "[t]he majority of utilities' rates reflect the recovery of pension and OPEB costs on an accrual basis".

**Question:** Please provide a list of the minority of utilities whose rates reflect the recovery of pension and OPEB costs on a cash basis.

## IR #2

**Reference:** Exhibit F1, Tab 1, schedule 1, page 10.
"OPG's proposal ensures that OPG receives the same effective treatment as other utilities. If, instead, the New Differential Account were to apply to recoveries of Interim Account balances recorded as of December 31, 2017, then OPG would receive a reduced amount in respect of its pension and OPEB accrual costs for that period. This would result in an inconsistent and unfair application of OEB policy across the regulated utilities, resulting in financial advantage to some and financial disadvantage to OPG."

**Question:**

  a) Considering that most of the utilities regulated by the OEB are municipally owned small distributors and not government owned very large power generators like OPG, and that there are significant differences among various utilities why does OPG believe that all utilities regulated by the OEB should have the same effective treatment?

  b) Why is OPG concerned that some utilities could have a financial advantage over OPG? Is OPG facing or expecting to face competitive pressures from other OEB regulated utilities? Please explain indicating which utilities are a competitive threat to OPG.

## IR #3

**Reference:** Exhibit F1, tab 1, schedule 1, pages 6 and 7

**Question:** Please provide a table showing the forecast of the impact of the OPG's proposed implementation of OEB policy on OPG earnings for each year from January 1, 2019 to December 31, 2021.

## IR #4

**Reference:** Exhibit H1, tab 1, schedule 1

**Question:** Compared to other utilities regulated by the OEB, OPG has a relatively large number of complicated deferral and variance accounts with varying recovery periods. Please provide a table listing all OPG deferral and variance accounts, showing the docket number of the OEB decision that approved each account, a short description of the purpose of the account, the recovery period, the total balance that is being recovered from ratepayers or credited to ratepayers and the expected annual amount if applicable, and the year in which each account will be terminated. Please identify accounts that are expected to continue for an indefinite period and the year in which OPG will be re-applying for their re-approval. Please include any OPG proposed accounts in the table.