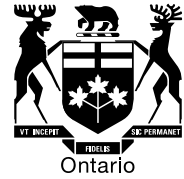


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**BY EMAIL**

November 8, 2018

Ontario Energy Board  
P.O. Box 2319  
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2300 Yonge Street  
Toronto ON M4P 1E4  
[Kirsten.Walli@oeb.ca](mailto:Kirsten.Walli@oeb.ca)

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Brantford Power Inc.  
2019 IRM Rate Application  
OEB Staff Submission  
OEB File No. EB-2018-0020**

In accordance with Procedural Order No. 2, please find attached OEB staff's supplementary interrogatories in the above proceeding. This document is being forwarded to Brantford Power Inc. and to all participating parties in this proceeding.

Brantford Power's responses to supplementary interrogatories are due by November 15, 2018.

Yours truly,

*Original Signed By*

Judy But  
Analyst, Application Policy & Climate Change

Encl.

## **OEB Staff Supplementary Interrogatories on Brantford Power's 2019 IRM Application (EB-2018-0020)**

### **Staff-S1**

Ref: Staff-1 c and Staff-2 b i (quantum of 2015 and 2016 adjustment)

#### Pre-amble

Brantford Power initially stated that it included the proposed adjustments to OEB-approved 2015 balances to mitigate customer bill impacts for the majority of RPP customers. In response to Staff-2 b i, Brantford Power confirmed that the 2015 adjustment should in fact be a collection of \$365,324 from RPP customers.

Brantford Power withdrew its request for making adjustments to 2015 approved balances in its response to OEB staff interrogatory 1 c, as the bill impact to RPP customers was no longer favourable to the majority of customers.

#### Questions

- a. In response to OEB staff interrogatory 1c, please clarify whether the 2015 adjustment of \$365,324 is the sum of two amounts: 1) debit amount of \$645,208 from 2015 RPP/Non-RPP proportions and 2) credit amount of \$279,884 to correct for 2015 IESO settlements, as an amount owing from the IESO.
- b. Given that the 2015 transactions for account 1588 of (\$1,546,522) was a credit number, CT142 would likely be a debit because RPP settlements is designed to reduce this amount. Since you have shown a credit amount of \$279,884, please confirm whether you received money from the IESO or paid back to the IESO.
- c. Please confirm that the 2015 RPP settlement with the IESO was calculated correctly, as the \$279,884 is a credit amount as are the 2015 transactions.
- d. Please confirm that the 2016 RPP settlement with the IESO was calculated correctly, as the \$375,315 related to CT142 is a debit amount as are the 2016 transactions of debit \$632,566.
- e. Please confirm the following:
  - i. Brantford Power originally made the retroactive adjustment only because it thought it would be in the customers' favour.
  - ii. As it is now not in the customers' favour, Brantford Power withdrew its request.
  - iii. If Brantford Power had known that the adjustment was not in the favour of customers to begin with, Brantford Power would not have requested to correct the account balances that it knew were incorrect.

## Staff-S2

Ref: Staff-1 c (2015 and 2016 settlement amount with IESO); 2019 IRM Rate Generator Model – DVA Continuity Schedule (2015 and 2016 corrections)

### Pre-amble

In response to previous OEB staff interrogatory, Staff-1c, OEB staff understands that Brantford Power is requesting the approval to return (\$279,884) related to 2015 settlement amounts to the IESO plus associated interest.

In the associated DVA continuity schedule, there is a 2015 related debit settlement correction with the IESO of \$279,884 recorded within the 2017 net transactions. However, the 2015 credit settlement correction is not shown as an adjustment in the DVA continuity schedule.

### Questions

- a. If the OEB were to allow retroactive adjustments, please provide Brantford Power's rationale for including retroactive adjustment to 2015 commodity variance account amounts for the OEB's consideration.
- b. Please indicate what amount regarding CT142 relating to 2015 is included in transactions in 2017. Please indicate whether it was a debit or credit, and what year the transaction went through the G/L and when did it appear on the IESO invoice.
- c. If \$279,884 is proposed to be returned to the IESO (which is now recorded as a debit amount included as a reversing entry in 2017 transactions), please confirm whether the original 2017 transactions amount was already lowered by the credit amount of \$279,884.
- d. If the above is not confirmed, please itemize the original entries made (to adjust in the relevant DVA continuity schedules) in 2017 relating to the 2015 principal and interest related adjustments.
- e. Please indicate what amount regarding CT142 relating to 2016 is included in transactions in 2017. Please indicate whether it was a debit or credit, and what year the transaction went through the G/L and when did it appear on the IESO invoice.
- f. Please itemize the subsequent transactions/adjustments relating to the 2015 principal adjustments. Which year and which column did you make the adjustments/reversals? Which year is this CT142 regarding corrections in the transactions column of the DVA continuity schedule?
- g. Please itemize the subsequent transactions/adjustments relating to the 2016 principal adjustments. Which year and which column did you make the

adjustments/reversals? Which year is this CT142 regarding corrections in the transactions column of the DVA continuity schedule?

### **Staff-S3**

Ref: Staff-5 (interest adjustments from 2015 and 2016 ODS data errors); 2019 IRM Rate Generator Model – DVA Continuity Schedule (recording of interest adjustment)

#### Pre-amble

OEB staff observes that interest adjustments related to the ODS data errors were included in 2015, 2016 and 2017 in the DVA continuity schedule. Since the corrections were made in 2017 and 2018, OEB staff believes the utility was not out-of-pocket in past periods.

#### Questions

- a. Please explain the appropriateness of claiming interest on the 2015 and 2016 principal corrections to 2015 and 2016, when the corrections weren't recorded in Brantford Power's General Ledger until the end of 2017/early 2018 respectively.
- b. Please itemize the interest corrections made for each of the periods relating to the 2015 & 2016 in a table (similar to that provided in Table Staff-5 a.1) and then update the DVA Continuity Schedule to eliminate interest on amounts related to 2015 and 2016 that were not recorded until end of 2017/early 2018.

### **Staff-S4**

Ref: Table in Response 4d of Appendix A; Staff-2 b

- a. Please file four updated 2019 Rate Generator models including any adjustments to DVA continuity schedules showing the impact on Group 1 DVA balances for the following scenarios:
  - i. An updated DVA continuity schedule incorporating the 2015 corrections originally proposed in this proceeding, including the elimination of interest amounts indicated in OEB Staff S3 above, as applicable. This version of the model should dispose of all Group 1 DVAs.
  - ii. The same model as in i. above but with no disposition of Group 1 DVAs.
  - iii. An updated DVA continuity schedule whereby the 2015 corrections originally proposed have been completely eliminated from all affected years, including the elimination of interest amounts indicated in OEB Staff S3 above, as applicable. This version of the model should dispose of all Group 1 DVAs.
  - iv. The same model as in iii. above but with no disposition of Group 1 DVAs.

- b. For scenarios i. and iii. above, please provide updated tables showing the impact on RPP and non-RPP (as submitted with response 4d of Appendix A).

#### **Staff-S5**

Ref: SEC-4 (bill impacts)

For each of the four scenarios from Staff-S4 i. – iv above, please provide an updated bill impact table.

#### **Staff-S6**

Ref: Staff-2 b

Due to the material changes made to the application, please prepare a reconciliation to explain the variances between RRR and 2017 year-end balances, similar to Table 1.5.6-H provided in the application.