



BY EMAIL and RESS

Mark Rubenstein
mark@shepherd Rubenstein.com
Dir. 647-483-0113

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

November 8, 2018
Our File: EB20180020

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2018-0020 – Brantford Power Inc. 2019 IRM – SEC Supplementary Interrogatories

We are counsel to the School Energy Coalition ("SEC"). Enclosed, please find the supplementary interrogatories on behalf of SEC.

Yours very truly,
Shepherd Rubenstein P.C.

Original signed by

Mark Rubenstein

cc: Wayne McNally, SEC (by email)
Applicant and interested parties (by email)

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15 (Schedule B);

AND IN THE MATTER OF an application to the Ontario Energy Board by Brantford Power Inc. pursuant to Section 78 of the *Ontario Energy Board Act* for approval of its proposed distribution rates and other charges, effective January 1, 2019.

SUPPLEMENTARY INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

SEC-5

[SEC-3] In SEC-3, BPI was asked to provide a table showing the impact to each customer class, separated by RPP and non-RPP customers, of the (then) proposed adjustment to the 2015 balances. In the tables provided BPI has double counted the impact of the Account 1588 adjustment by making that entire adjustment again against the non-RPP customers, where in reality only a portion of the account is actually allocated to non-RPP customers.

- a. If this is correct, please revise the table.
- b. If the response to SEC-4 was also calculated on a similar basis, please revise that table.
- c. If any updates to the 2015 balances are made as a result of the supplementary interrogatories responses, please provide revised versions of tables requested in part (a) and (b).

SEC-6

[Staff-1, SEC-2] In response to Staff-1(d) and SEC-2, BPI responded to a interrogatory about the IESO submission error, stating in part” “In the process of completing the Global Adjustment Variance Account reconciliation for the first time during its 2018 IRM application, BPI examined the original input data for the calculations, including the ODS meter data. In doing so, BPI identified unexpectedly high consumption records for individual customers which looked anomalous. BPI confirmed these meter readings were anomalous and as a result, recalculated its IESO submissions for 2015 and 2016 on assumed more appropriate values for the anomalous entries”.

- a. Where these customers billed based on this erroneous ODS meter data?
- b. If the answer to part (a) is yes, how many customers were affected and in what classes?
- c. Please explain in detail the services ODS provides to BPI.
- d. Please explain why the Applicant requires a third-party provider to provide it with meter data.
- e. What is the annual cost incurred by BPI for these services provided by ODS.
- f. Please provide a copy of the KPMG review reference in SEC-2.

SEC-7

For each rate class, please provide a breakdown of the number of RPP and Non-RPP customers.

Respectfully submitted on behalf of the School Energy Coalition this November 8th, 2018.

Original signed by

Mark Rubenstein
Counsel for the School Energy
Coalition