

PUBLIC INTEREST ADVOCACY CENTRE LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

November 29, 2018

VIA E-MAIL

Ms. Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge St. Toronto, ON

Dear Ms. Walli:

Re: EB-2018-0063 Ottawa River Power Corporation - 2019 Electricity Distribution Rates Notice of Intervention of Vulnerable Energy Consumers Coalition (VECC)

Please find enclosed the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

(Original Signed By)

John Lawford Counsel for VECC

Copy to: Ottawa River Power Corporation

EB-2018-0063

Ottawa River Power Corporation Application for electricity distribution rates effective May 1, 2019

Vulnerable Energy Consumers Coalition (VECC) Interrogatories

Incremental Funding for a New Substation

VECC-1

a) Please complete the following table:

	2015	2016	2017	2018	2019	2020
	CAPEX	CAPEX	CAPEX	CAPEX	CAPEX	CAPEX
Plan/Board						
Approved						
Actual						
In-Service						
Additions						
(Actual)						

b) Please explain any CAPEX variances greater than 10%.

VECC-2

- a) Please provide Ottawa River's capital investment project/program listing for the years 2015 to 2019 in a format consistent with Appendix 2-AA and provide the excel spreadsheet.
- b) Please identify the capital projects/programs in 2019 that are discretionary.
- c) Please identify the capital projects/programs in 2019 that are new.

VECC-3

Ref: EB-2014-0105 Exhibit 2 Rate Base 5.0 Introduction P4

The evidence in ORPC's 2015 Cost of Service (COS) application states "ORPC's distribution system in Almonte was designed and constructed since the 1900's and the distribution system contains a 2400 Volt feeder system. It is also important to note that ORPC also owns and operates three individual transformer stations in Almonte that are located throughout the town. Two substations will require upgrading in the next 10 years and the addition of a new substation is planned for future growth beyond 2020. From a replacement cost perspective, the new transformer station may represent approximately 5% of ORPC's entire asset."

a) Please provide any demand and growth projections and substation capacity analysis and any other analysis performed by Ottawa River at the time of the last COS application that Ottawa River relied

on to determine that two substations will require upgrading in the next 10 years and the addition of a new substation is planned for future growth beyond 2020.

- b) Please explain what has specifically changed in the analysis, demand and growth projections and substation capacity analysis since the time of the last COS application to support an ICM for a new MS-4 substation in Almonte in 2019, earlier than originally thought.
- c) Please identify the two substations requiring upgrading in the next 10 years, the forecast timing of these upgrades and the work required.

VECC-4

Ref: Section 22 Incremental Capital Module Rate Rider Request P19

The evidence states "In 2017 a Substation Condition Assessment Study was commissioned by Ottawa River Power (Appendix D). With a new president appointed, this was a necessity to continue with the Distribution Plan as filed with its 2015 Cost of Service Application. The Assessment completed in 2017 found many substation deficiencies. Nine of its current substations are over forty years old. While the distribution system plan indicated that a substation could be built after 2020 in Almonte, this is proven to not be the case.

- a) When was the new President appointed?
- b) Please explain further how the appointment of a new President impacts continuation of the Distribution Plan filed with the 2015 COS application.
- c) Please provide a listing of all substation condition assessment reports undertaken since 2010.
- d) Please provide a copy of the most recent substation condition assessment report(s) prior to the Costello substation Condition Assessment Report dated September 2017 (Appendix D).
- e) Please provide a schedule that compares the key differences in the 2017 substation deficiencies compared to the previous assessment.

VECC-5

Ref: Section 22 Incremental Capital Module Rate Rider Request P16

- a) Please provide the customer numbers for each of the years 2013 to 2017.
- b) Please provide the customer numbers forecast for each of the years 2019 to 2030.
- c) Please provide customer consumption for each of the years 2013 to 2017.
- d) Please provide customer consumption forecast for each of the years 2019 to 2030.

VECC-6

Ref: Section 22 Incremental Capital Module Rate Rider Request P18

- a) Did Costello provide a cost estimate for the project? If yes, please provide.
- b) Please discuss Ottawa River's approval process for the project and the status of the approvals.
- c) Please provide the latest in-service date for the project.
- d) Please provide details on the costs incurred to date for the project by year.
- e) Please discuss Ottawa River's plan regarding a true-up of costs related to the construction of the substation.
- f) Please discuss alternatives to the project and the cost of each alternative.
- g) Please provide the approved business case for the project.
- h) Please indicate the party that will undertake the Engineering and Design, Civic Construction and Electrical work.

VECC-7

Ref: Section 22 Incremental Capital Module Rate Rider Request P21

The evidence indicates "The complete load in Almonte during peak times is more than what two stations are able to handle. If one station was to go "down", ORPC would be faced with trying to rent a mobile station. ORPC would not be able to shift a fully dropped load to the other two stations.

- a) Please identify the stations and provide the analysis to show the load in Almonte during peak times is more than what the two stations are able to handle.
- b) Please provide the cost to rent a mobile station.

VECC-8

Ref: Section 22 Incremental Capital Module Rate Rider Request P22

Please discuss when Ottawa River expects each existing station to reach capacity?

VECC-9

Ref: Section 22 Incremental Capital Module Rate Rider Request P23

The evidence indicates Ottawa River Power purchased a lot on Industrial Drive in Almonte for the construction of the new Substation 4. This location was chosen to relieve the pressure on Substation 2. It will also serve future growth in the North. ORPC is currently working with Costello Utility Consultants

who will do the electrical engineering and project management. The transformer is going out to tender by the end of September with the intention of the station being in full service by June 2019.

- a) When was the lot purchased? When did the sale close?
- b) Please provide a Map that shows where MS-4 will be located in relation to the other Stations.
- c) Please discuss options looked at to build MS-4 on land owned by Ottawa River.
- d) Please provide the date the transformer went out to tender.
- e) When and how was Costello retained to do the electrical engineering and project management?

VECC-10

Ref: Appendix D

- a) Please provide the Terms of Reference for the Study.
- b) Was an RFP issued for the Substation Condition Assessment Study.

VECC-11

Ref: Appendix D Section 4. Recommendations

Please provide Ottawa River's response to each of the Recommendations in the Report.

VECC-12

Ref: General

- a) Please provide the timing for Ottawa River's next rebasing application.
- b) Please explain why the proposed construction of a new municipal substation in Almonte cannot be part of Ottawa River's next COS application.
- c) Please advise of the actions Ottawa River will take in the event that the Board does not approve the ICM applied for.
- d) Please confirm base rates do not include amounts related to this project.
- e) Please provide Ottawa River's SAIDI and SAIFI results for the years 2013 to 2017 excluding Major Event Days and Loss of Supply.
- f) Please provide the number of customer interruptions, the number of customer interruption minutes and # of customers impacted in Almonte related to MS-#1, 2 and 3 for each of the years 2008 to 2018.