



PUBLIC INTEREST ADVOCACY CENTRE
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January 10, 2019

VIA E-MAIL

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

Dear Ms. Walli:

**Re: EB-2018-0021 Burlington Hydro Inc. 2019 Electricity Distribution Rates
Vulnerable Energy Consumers Coalition (VECC) Interrogatories**

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: Sally Blackwell, Burlington Hydro Inc.

EB-2018-0021

Burlington Hydro Inc.

Application for electricity distribution rates effective May 1, 2019

VECC Interrogatories

VECC-1

Ref: Exhibit 1 P14 Table 24

- a) Please provide the planned budgeted amounts for each of the years 2015 to 2018.
- b) Please provide 2018 actuals.

VECC-2

Ref: Exhibit 1 P38

Burlington Hydro states, "Each project is distinct and unrelated to a recurring annual capital project. Three projects are system access projects related to the provision of supply from Hydro One owned transformer stations. The fourth project is a general plant project involving the replacement of Burlington Hydro's Customer Information System.

Please explain Burlington Hydro's request in this application related to the fourth project: replacement of Burlington Hydro's Customer Information System.

VECC-3

Ref: Appendix H P1

Based on an estimate of the fifth-year true-up using an updated demand forecast, Burlington Hydro has determined a shortfall in revenue to Hydro One of \$2.5 million as compared to the CCRA.

Please provide the calculation that underpins the \$2.5 million.

VECC-4

Ref: Exhibit 1 P44

Burlington Hydro indicates it will make a subsequent update to the application for the actual true-up amount which is expected to be available from Hydro One prior to the Board rendering its Decision on this application.

- a) Please provide an update on the status of receiving the actual true-up from Hydro One.
- b) If available, please provide the actual true-up amount and the underlying calculation.

VECC-5

Ref: Exhibit 1 P45

Burlington Hydro indicates the estimate of the fifth-year true-up for the Tremaine TS is based on an updated demand forecast.

- a) Please provide a schedule that outlines the annual forecast demand for the Tremaine TS at the time of the signing of the first Hydro One agreement compared to the updated demand forecast.
- b) For each annual period in part (a), please provide the average monthly unused capacity (MW) at Tremaine TS.
- c) Please identify the key assumptions in the original demand forecast and explain any variances in these key assumptions.
- d) Please provide the new key assumptions that underpin the revised forecasted demand.

VECC-6

Ref: Appendix G P1

- a) Please provide the total available capacity at the Tremaine TS.
- b) Please confirm 25% of the capacity of the Tremaine TS is allocated to Milton Hydro.
- c) Please provide Burlington Hydro's contracted capacity at Tremaine TS.
- d) Please provide the % of available capacity at the Tremaine TS at the end of 2017.
- e) Please provide the original capital contribution for Tremaine TS.

VECC-7

Ref: Appendix G Schedule A P8

Please complete the following table :

Existing Load Facility	Existing Load (MW)*	Normal Capacity (MW)*
Burlington TS		
Bronte TS (T2)		
Cumberland TS		
Palermo TS		
Tremaine TS		
Total		

- Definitions as per Appendix G Schedule A

VECC-8

Appendix J P1

Please provide a breakdown of the \$2 million budget amount.

VECC-9

Appendix J P1

Please provide the forecast in-service date in 2019.

VECC-10

Ref: Appendix J P1

The evidence states “In late 2017, Burlington Hydro determined it needed to construct two (2) more breakers to allow for full utilization of its capacity at the Tremaine TS to:

- i. accommodate future growth in the North-East area of Burlington which is served by the Tremaine TS and the Palermo TS.
 - ii. take load off the Bronte TS which is operating over capacity; and
 - iii. take load off the Cumberland TS for which capacity needs to be freed up to accommodate future growth in the downtown core.
- a) Please provide the capacity at the Tremaine TS that will be utilized through the construction of the two new breakers.
 - b) For each of the above needs (i-iii), please provide the corresponding load.
 - c) For each of the above needs (i-iii), please provide the forecast timing.

VECC-11

Ref: Appendix J P1

The evidence indicates that if Burlington Hydro defers purchase of breakers until a later date and the breaker positions were no longer available (Option #2), Burlington Hydro’s options to acquire additional capacity are (i) to build out the Tremaine TS structure to accommodate more breakers, which cannot be guaranteed by HONI or (ii) build a new TS; both of which are significantly more expensive than the capital cost of constructing two breakers.

- a) Please provide the cost estimate (i) to build out the Tremaine TS structure to accommodate more breakers and (ii) build a new TS.
- b) Are there any provisions in Burlington Hydro’s agreement with Hydro One, for Hydro One to provide advance notice to Burlington Hydro of any potential requests from load customers for available capacity? If yes, please provide details.

- c) Is Burlington Hydro aware of any near-term or long-term requests from load customers seeking available capacity? If yes, please provide details.

VECC-12

Ref: Appendix L

In 2006, Burlington Hydro requested that Hydro One install two 27.6kV feeder breaker positions Hydro One's Bronte TS #2. Hydro One conducted the 5th-year true-up in 2013 at which time it was determined that Burlington Hydro did not owe monies in excess of the original capital contribution. HONI will be conducting the 10th-year true-up in Q4 2018. Burlington Hydro is estimating a shortfall in revenue to Hydro One of \$0.35MM as compared to the CCRA. Burlington Hydro expects to make this payment to HONI in Q1 2019.

- a) Please provide Hydro One's 10th-year true-up provided in Q4 2018 and provide the documentation and calculation.
- b) Please provide a schedule that outlines the annual forecast demand (load) for the Bronte TS Breakers at the time of the signing of the first Hydro One agreement compared to the updated demand forecast.
- c) Please identify the key assumptions in the original demand forecast (load) for the Bronte TS Breakers and explain any variances in these key assumptions.
- d) Please provide the new key assumptions that underpin the revised forecasted demand (load) for the Bronte TS Breakers.

VECC-13

Ref: Appendix L

Please discuss if the 5 year true-up payment was discussed in Burlington Hydro's 2014 Cost of Service application and if any amount was approved in 2014 rate base.

VECC-14

Appendix N

- a) Please provide Burlington Hydro's vegetation management strategy.
- b) Please provide Burlington Hydro's vegetation management cycle.
- c) Please provide Burlington Hydro's vegetation management accomplishments for each of the years 2013 to 2018 compared to plan.
- d) Please provide Burlington Hydro's vegetation management budget vs. actuals for each of the years 2013 to 2018.

- e) Please provide the total number of hours worked on the Z-factor event.
- f) Please provide the number of hours in part (e) at Regular Time and Overtime.
- g) Please provide the vegetation management amount approved in base rates.
- h) Please provide storm budget vs. actuals for each of the years 2013 to 2018.
- i) Please provide the storm budget amount approved in base rates.