

ONTARIO ENERGY BOARD

IN THE MATTER 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 Energy+ 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.

Technical Conference Interrogatories

of

Toyota Motor Manufacturing Canada Inc. (“TMMC”)

to

Energy+ Inc. (“Energy+”)

EB-2018-0028

January 16, 2019

TECHNICAL CONFERENCE TMMC IR-1

Issue: Cost Allocation and Rate Design

References: Energy+ Responses to TMMC Question 10 (April 10, 2018), IR-TMMC-11 (September 14, 2018), IR-TMMC-11(1) (September 14, 2018), Clarification TMMC-3 (September 19, 2018) and Clarification TMMC-5 (September 20, 2018)

Preamble: TMMC requires information regarding the assets that are used to provide distribution service to TMMC.

Questions:

- (a) Please confirm that the following assets are used, exclusively, to provide distribution service to TMMC:
- (i) the 21M24 and 21M30 overhead feeders;
 - (ii) insulators, clamps, bolts, bracket connectors and switches associated with (i) above;
 - (iii) two TMMC-specific load-break switches;
 - (iv) a “few” solid blade switches;
 - (v) the poles located at the Preston TS; and
 - (vi) the lightning arrestors on the 21M24 and 21M30 overhead feeders.
- (b) Are there any other assets not listed above that are used, exclusively, to provide service to TMMC (for example, TMMC-specific meters)? If “yes,” please identify.
- (c) Please confirm that the following assets are used to provide distribution service to TMMC as well as to other Energy+ customers:
- (i) the 109 poles that support the 21M24 overhead feeder;
 - (ii) the 145 poles that support the 21M30 feeder;
 - (iii) four (4) meters that were upgraded in 2015;
 - (iv) PTs and CTs at the Preston TS; and
 - (v) general plant assets (eg., vehicles, office, tools and equipment).
- (d) Are there any other assets not listed above that are used to provide distribution service to both TMMC and to other Energy+ customers? If “yes,” please identify.

- (e) Please provide the 1NCP and 4 NCP loads (in kW) served by the M25, M27, M29 and M42 feeders, as applicable, that are supported on the poles or towers that also support the 21M24 feeder.

- (f) Please provide the 1NCP and 4NCP loads (in kW) served by the M25, M27, M29 and M42 feeders, as applicable, that are supported on the poles or towers that also support the 21M30 feeder.

TECHNICAL CONFERENCE TMMC IR-2

Issue: Cost Allocation and Rate Design

References: Energy+ 2019 Cost of Service Application (“**Application**”); Settlement Proposal dated December 12, 2018 (“**Settlement Proposal**”)

Preamble: TMMC expects to file updated evidence (“**Updated Evidence**”) by February 15, 2019 in accordance with Procedural Order No. 7. TMMC expects that the Updated Evidence will include a proposal for a TMMC-only rate class and full direct assignment of the costs of providing distribution service to TMMC. TMMC requires certain information from Energy+ in this regard.

Questions:

- (a) Please provide a class cost-of-service (“**CCOS**”) study that that reflects the settlement of the revenue requirements elements of the Application as set in the Settlement Proposal and a scenario whereby (i) TMMC is in its own customer rate class; and (ii) the costs of providing distribution service to TMMC are directly assigned to TMMC.
- (b) Please provide a working copy of the model that underpins the CCOS provided in response to (a) above.
- (c) Please provide all backup workpapers, in “live” Excel format, that support the direct assignment of costs to TMMC.
- (d) Please list all of the assumptions that underpin the CCOS provided in response to (a) above, including:
 - (i) for O&M costs, assumptions with respect to number of allocated hours and hourly rates;
 - (ii) for costs of distribution assets not used exclusively to serve TMMC, assumptions with respect to total investment, accumulated amortization and net book value allocated to TMMC, for each asset; and
 - (iii) assumptions with respect to the allocation of any TMMC capital contributions, including amounts and dates of such contributions.