Ontario Energy Board P.O. Box 2319 27th Floor 2300 Yonge Street Toronto ON M4P 1E4 Telephone: 416- 481-1967 Facsimile: 416- 440-7656 Toll free: 1-888-632-6273 Commission de l'énergie de l'Ontario C.P. 2319 27e étage 2300, rue Yonge Toronto ON M4P 1E4 Téléphone: 416-481-1967 Télécopieur: 416- 440-7656 Numéro sans frais: 1-888-632-6273



BY E-MAIL

January 17, 2019

Michelle Reesor Newmarket-Tay Power Distrbution Ltd. 590 Steven Ct Newmarket, ON L3Y 6Z2 <u>mreesor@nmhydro.ca</u>

Dear Ms. Reesor:

Re: Newmarket-Tay Power Distribution Ltd. Application for Rates OEB File Number EB-2018-0055

In accordance with Procedural Order No. 1, please find attached OEB staff's interrogatories in the above proceeding. Newmarket-Tay Hydro has been copied on this filing.

Newmarket-Tay Hydro's responses to interrogatories are due by January 31, 2019.

Yours truly,

Original Signed By

Marc Abramovitz Case Manager

Attachment

Newmarket-Tay Power Distribution Ltd. IRM Application (EB-2018-0055) OEB Staff Questions

Newmarket-Tay Rate Zone

OEB Staff Question #1

Ref: IRM Model - Sheet 11, Sheet 16 and Sheet 18

OEB staff has made the following updates to Newmarket-Tay Hydro's IRM Model.

- Sheet 11 Updated the UTRs as per the OEB's Decision and Interim Rate Order, EB-2018-0326, December 20, 2018.
- Sheet 16 Updated the Price Escalator to 1.50% (For 2019 Inflation factor see Ontario Energy Board 2019 Electricity Distribution Rate applications Updates November 23, 2018)..
- Sheet 17 Updated the regulatory charges as per the OEB's Decision and Order, EB-2018-0294, December 20, 2018.
- Sheet 18 The rate riders for the disposition of Account 1576 were filed as debits (charges) to customers in the manager's summary and should have been shown as credits (refunds) to customers. The credit rate riders were not reflected in Sheet 18 of the IRM rate generator model. OEB staff input the credit rate riders into this tab.

Please confirm the updates in the IRM rate generator model for the changes above.

OEB Staff Question #2

Ref: Manager's summary - Page 18 of 37, IRM Model, Sheet 3 and Sheet 4

The manager's summary notes an LRAMVA balance for disposition of \$460,882. However, in cell BT43 on Sheet 3 of the IRM model the total LRAMVA balance shows a total claim amount of \$464,682. Furthermore, in cell S23 of Sheet 4 of the IRM model the LRAMVA balance is \$463,315.

Please identify the correct LRAM variance account amount requested for disposition and update the Sheet 3 and/or Sheet 4 of the IRM model.

OEB Staff Question #3

Ref: Manager's summary – Page 35 of 37

For the years 2012-2016, OEB staff has compared the net additions for PP&E values under former CGAAP to the values filed in Newmarket-Tay Hydro's 2018 IRM proceeding (EB-2017-0062). OEB staff notes that there are differences for the years 2013-2016.

Please reconcile the differences and update the chart on page 35 as necessary.

Ref: Decision and Order, EB-2017-0062, April 12, 2018 Audit Report, Filed November 2, 2018

In the referenced OEB decision, the OEB required Newmarket-Tay Power to complete a third-party special purpose audit of its Group 1 RSVA accounts prior to its 2019 IRM filing.

Please confirm that the audit report completed by Collins Barrow Kawarthas LLP and filed by Newmarket-Tay Power on November 2, 2018 audited all Group 1 RSVA accounts.

OEB Staff Question #5

Ref: GA Workform (2013-2017) Note 2

In Table 1 below, OEB staff has compared the consumption information provided in Note 2 for each GA workform to Newmarket-Tay Hydro's RRR filing.

Please provide a reconciliation for each variance located in Table 1 below and update the GA workforms as necessary. **Note**: Newmarket-Tay Hydro is using an older version of the GA workform. The OEB has updated the GA workform for the 2019 IRM year on July 13, 2018. Please file all updates to the GA workform using the following model:

https://www.oeb.ca/sites/default/files/GA_Analysis_Workform_20180712-3.xlsb

AS FILED IN APPLICATION							
Year		2013	2014	2015	2016	2017	
Total Metered excluding WMP	C = A+B	664,104,226	634,976,687	648,485,019	650,386,987	626,156,512	
RPP	А	363,905,363	338,375,737	358,064,600	363,246,586	346,134,592	
Non RPP	B = D + E	300,198,863	296,600,950	290,420,419	287,140,402	280,021,920	
Non-RPP Class A	D	-		-	-	34,636,905	
Non-RPP Class B*	E	300,198,863	296,600,950	290,420,419	287,140,402	245,385,015	
AS FILED THROUGH RRR							
Year		2013	2014	2015	2016	2017	
Total Metered excluding WMP	C = A+B	659,512,951	655,588,093	651,351,484	628,822,211	586,771,519	
RPP	А	306,505,291	315,914,328	317,007,389	305,579,069	344,187,239	
Non RPP	B = D + E	353,007,660	339,673,765	334,344,095	323,243,142	242,584,280	
Non-RPP Class A	D	-	-	-		35,496,456	
Non-RPP Class B*	E	353,007,660	339,673,765	334,344,095	323,243,142	207,087,824	
VARIANCE							
Year		2013	2014	2015	2016	2017	
Total Metered excluding WMP	C = A+B	4,591,275	(20,611,406)	(2,866,465)	21,564,776	39,384,993	
RPP	А	57,400,072	22,461,409	41,057,211	57,667,517	1,947,353	
Non RPP	B = D+E	(52,808,797)	(43,072,815)	(43,923,676)	(36,102,740)	37,437,640	
Non-RPP Class A	D	-	-			(859,551)	
Non-RPP Class B*	E	(52,808,797)	(43,072,815)	(43,923,676)	(36,102,740)	38,297,191	

Table 1

Ref: Tab 6. Class A Consumption Data Ref: Tab 6.1a GA Allocation – cell D20 Total Non-RPP Class B consumption Ref: Tab 6.2a CBR B_Allocation – cell D20 Total Class B consumption less WMP

OEB staff is unable to reconcile the data entered in cells D20 in Tab 6.1a and Tab 6.2a. Below is a table that staff prepared showing the "Validation of Data used in class B GA and CBR Allocations". Staff notes discrepancies for the 2017 consumption figures that were used in the "GA allocation" and "CBR B Allocation" of 2019 IRM rate model as below.

Year the Account 1589 GA Balance Last Disposed 2012 total Non-RPP Consumption (kWh) between Current Class B and Class A/B Transition 2017 2015 2014 2013 Total Non-RPP Class B Consumption for Years During Balance nption LESS WMP Consumpties partial or full year) Transition Customers' Class B Consumption (i.e. full year or partial 30,965,525 30.965.52 97,724,260 30,873,129 48,770,644 18,080,487 sition Customers' Portion of Total Consumption

Please enter the Year the Account 1580 CBR Class B was Last Disposed. Disposed

(Note: Account 1580, Sub-account CBR Class B was established starting in 2015)

Allocation of total Consumption (kWh) between Class B and Class A/B Transition Customers

		Total	2017	2016	2015
Total Class B Consumption for Years During Balance Accumulation (Total Consumption LESS WMP Consumption and Consumption for Class A customers who were Class A for partial or full year)	A	30,965,525	30,965,525	\bigcirc	\bigcirc
Transition Customers' Class B Consumption (i.e. full year or partial year)	в	79,643,773	30,873,129	48,770,644	18,080,487
Transition Customers' Portion of Total Consumption	C=B/A	257.20%	92,396 -	48,770,644	- 18,080,487

Table 1 – confirmation of 2017 consumptions

Validation of D	ata used in C	lass B GA and C	BR Allocations	
				Source I26 of tab 4. Billing
Total metered volume Excl WMP	Α		622,267,975	Det. for Def-Var
Non-RPP excl WMP	В		278,080,736	Source C26 of tab 6.1 GA
Class A Full year	С		-	Source E26 of tab 6.1 GA
Class A Full Part year:				
While Class A	D	34,636,905		=+F-E
While Class B	E	30,873,129		Source D21 of tab 6.1a GA Allocation
	F		65,510,034	Source G26 of tab 6.1 GA
Total non-RPP excl WMP and full year volumes for class A customers who were class A for the full year, and the class A				Input in D20 of tab 6.1a G
volumes who were class A part year	G= +B-C-D		243,443,831	Allocation
Total Class B Customers excl WMP and Full year volumes for customers who were class				
A for full year, and the class A customers who were class A part year	H=+A-C-D		587,631,070	Input in D20 of tab 6.2a CBR_B Allocation

- a. Newmarket-Tay Hydro received disposition of its group 1 accounts in its 2014 proceeding for balances ending December 31, 2012. As per the instruction in cell D14 of Sheet 6, OEB staff has updated cell C14 to display the 2012 year.
 - i. Please complete columns L through O on Sheet 6.
- b. Please confirm whether or not Newmarket-Tay Hydro agrees with the updated quantities per the Table 1 calculations for 2017. If not please explain why Newmarket-Tay Hydro believes the

values it used in its 2019 IRM Rate Generator Model are appropriate. Otherwise please update the 2019 IRM Rate Generator Model accordingly.

c. Using Table 1, please provide similar calculations for the years 2013 – 2016 and update the 2019 IRM Rate Generator Model accordingly.

OEB Staff Question #7 Ref: IRM Model – Sheet 3 & 6.2a & 6.2

- a. In its application, Newmarket-Tay Hydro noted that, as of 2017 it had ten class A customers (July 2017 to December 2017). On Sheet 3, Continuity Schedule, please allocate out the variances related to CBR Class B customers from account 1580 and show them as a separate item under sub-account CBR Class B 1580. If any variance to the RRR balance (as of December 31, 2017) still remain, please explain.
- b. Explain the variance of \$1,385 for Account 1580 sub-account CBR Class A.
- c. Explain why Newmarket-Tay Hydro has opted not to dispose of the balance in Account 1595 for the 2012 year. If, as a result of its responses to interrogatories, Newmarket-Tay Hydro decides to dispose of the balance, please explain any variance from the RRR balance (as of December 31, 2017) and file a 1595 analysis workform for the sub-account 2012..

OEB Staff Question #8

Ref: IRM Application, page 21 of 27

In the response provided to Question 2, the Applicant discusses how it performs its monthly RPP settlements with the IESO.

- a) The response provided in 2a indicates that the Applicant settles with the IESO based on actual consumption. Please explain how the Applicant is able to determine the actual consumption for a given month by the 4th day following the month end (please provide the source of all information being referenced in the response).
- b) Please confirm that the Applicant is stating that the only true-up that is required to its monthly IESO settlements relates to a true-up to the actual GA and HOEP rates for the particular month.
- c) When is the CT 1142 true up done (i.e. monthly, in the month following initial settlement?).
- d) Since the last disposition of Account 1588 in 2012, was the Applicant's monthly settlement process with the IESO always based on its actual monthly consumption or was there a point in time where it was based on an estimate of the monthly consumption?
 - a. If at one point it was based on an estimate, when did the process change to use actual consumption (year).
 - b. For years where the settlement was based on an estimate of consumption, please confirm that the Applicant would true-up the settlement to actual consumption.
 - c. Have the true-ups being referred to in b. above been captured in the December 31, 2017 balance per the DVA continuity schedule?
- e) For response 2e, please confirm that the Applicant is indicating that the CT 1142 true-up for both November and December 2017 have not been accrued and included within the December 31, 2017 balance in Account 1588 as per the DVA continuity schedule.
- f) If the Applicant confirms the above, then please quantify what the CT 1142 true-up for November and December 2017 and present that total in the "Principal Adjustments during 2017" column of the DVA Continuity Schedule.

Ref: IRM Application, page 23 of 27

In the response provided to Question 3, the Applicant discusses its process for recording and prorating the monthly CT 148 charge from the IESO.

- a) Please indicate when the Applicant's process to prorate the CT 148 charge using actual consumption was implemented (year)
- b) In years prior to the implementation noted in a) above, please explain how the Applicant prorated the CT 148 charge and how that proration was subsequently trued-up to actual.
- c) Have the true-ups described in b) above been reflected in the December 31, 2017 balances in accounts 1588 and 1589 per the DVA continuity schedule.

OEB Staff Question #10

Ref: Audit Report

As part of the Decision from its 2018 IRM Application, the Applicant was ordered to review and undertake an audit of it RSVA balances, including the balances in Accounts 1588 and 1589:

- a) After undertaking a review of its processes over Accounts 1588 and 1589, please describe any changes that the Applicant has implemented, including over its RPP settlement process and resulting true-ups, the recording and prorating of its CT 148 charge, and any other changes made that are relevant to the accumulation of the balances in those account. In providing the details, please indicate how the process was originally performed, what was changed, and why the changes result in better and more accurate reporting of the balances.
- b) The Collins Barrow Audit Report details a number of adjustments that were recorded to the December 31, 2017 balances in Accounts 1588 and 1589:
 - i. Note 2 of the Audit Report refers to adjustments to Accounts 1588 and 1589 pertaining to

"Management identified issues with the split of charge type 148 for the cost of power from the IESO and corrected the balances prior to the audit; and Management identified issues with the unbilled calculations and corrected balances prior to the audit"

Please explain the nature of each of the above issues, how the errors were quantified by management, and what has changed to ensure that similar errors do not repeat in the future.

- ii. Notes 3 and 4 also provide very brief descriptions as to other adjustments that have been recorded to the balances in Accounts 1588 and 1589. For each adjustment identified, please elaborate as to the nature of the issue, how the errors were quantified, and what has been changed to ensure that similar errors do not repeat in the future.
- c) In the DVA continuity schedule, the Applicant has recorded principal adjustments of debit \$3.5 million and credit \$556K to accounts 1588 and 1589, respectively. Although the December 31, 2017 ending balance in the DVA continuity schedule agrees to the balance per the Audit Report, the adjustments recorded in the principal adjustment column of the DVA continuity schedule do not reconcile to the adjustments presented in the Audit Report. In particular, for Account 1588,

the Applicant has recorded adjustments of debit \$3,549,164 in the DVA continuity schedule, compared to credit \$1,208,731 in the Audit Report.

- i. Please explain why this difference exists.
- ii. Please provide a detailed reconciliation, by year, between the adjustments posted in the audit report and the principal adjustments recorded in the DVA continuity schedule.
- iii. Please explain the principal adjustments recorded to accounts 1588 and 1589 under 2015 year (Cells AL28 and AL29) as these figures are not associated with the audit adjustments from the audit report.

OEB Staff Question #11

Ref: Tab 3-a. Rate Class Allocations of LRAMVA Workform

a. Please show the calculation of the rate class allocations for a GS>50 kW - Thermal Demand Meter vs. GS>50 kW - Interval Meter.

OEB Staff Question #12

Ref: Tab 7 of LRAMVA workform

a. Please update tab 7 of the LRAMVA workform to include projected carrying charges to the effective date of May 1, 2019 in the claim.

OEB Staff Question #13

- a. If Newmarket-Tay made any changes to the LRAMVA work form as a result of its responses to these LRAMVA questions, please file an updated LRAMVA work form.
- b. Please confirm any changes to the LRAMVA workform in response to these LRAMVA questions in "Table A-2. Updates to LRAMVA Disposition (Tab 2)".

Midland Rate Zone

OEB Staff Question #14

Ref: IRM Application, Midland Rate Zone, pg. 23

With respect to its monthly settlements with the IESO and the resulting CT 1142, in response 2b, the Applicant indicates that an annual true-up is conducted at year-end to align the settlement submission to the correct fiscal year. The annual true-up amounts are booked to the financial statements of the settlement year.

- a) The response provided to Question 2b does not explain what is being trued-up as part of this annual true-up process. Please provide detail as to what elements of the IESO settlement is actually being trued-up as part of this annual true-up and provide details around the process that is undertaken to quantify the true-up amounts.
 - i. If the Applicant is truing-up it's settlements with the IESO on an annual basis (as stated in the application), please explain why the true-ups are not being performed on at least a quarterly basis as per the OEB's May 23, 2017 letter to all rate regulated utilities in Ontario.
- b) Please confirm that the following understanding is correct with respect to the IESO monthly settlement process for the Midland Rate Zone:
 - i. The monthly settlement is based on the actual consumption for the month, which is available by the 4th day following the month-end.
 - ii. The GA rate and WAP used for settlement are based on estimates at the time of settlement.
- c) Wouldn't a monthly true-up of IESO settlements be required to account for the fact that settlements are initially performed using estimates of the GA rate and WAP? Is the Applicant performing this true-up on a monthly basis and have these true-ups been reflected in the DVA continuity schedule for all months of 2017?

OEB Staff Question #15

Ref: IRM Application, Midland Rate Zone, pg. 24

The responses provided to Question 3 address the Applicant's recording of CT 148 from the IESO and its process to prorate this charge between its RPP and Non-RPP customers.

- a) Please confirm that no amount related to CT 148 is recorded in the Applicant's G/L prior to receiving the actual invoice from the IESO.
- b) The Applicant uses two system queries to generate monthly reports for total actual consumption and for total actual RPP consumption. These reports then from the basis of the calculation used to split the monthly CT 148 charge from the IESO between RPP and Non RPP customers. Does the report generated for total actual consumption for a particular month also include the consumption for Class A customers? Please explain.
- c) It is not clear from the response provided in 3b whether a true-up of the CT 148 split is needed. Based on OEB staffs understanding, the Applicant knows its actual consumption for a particular month upon receipt of the CT 148 invoice from the IESO. Therefore the invoice is initially split between RPP and Non RPP customers based on actual consumption. As such it is OEB staff's understanding that no true-up of the split is required, please confirm that this understanding is correct.
- d) If the description provided in c) above is accurate, then please explain why the Applicant is referring to a true related to CT 148 in its response to Question 3b? Please explain in detail what

elements of CT 148 would need to be trued-up and why. Please also provide details over the Applicant's process to perform this true-up (if a true-up is actually even required).

OEB Staff Question #16

Ref: IRM Application, Midland Rate Zone, pg. 27

As part of its response to Question 4, the Applicant has stated that "Newmarket-Tay Power did not receive approval for disposition in its 2018 proceeding".

- a) OEB staff suggests that the wording should be adjusted to read "The Midland Rate Zone did receive approval for disposition in 2018". The answers provided must be in the context of the Midland Rate Zone as it is still being treated as a standalone rate zone for purposes of this IRM. Please update the responses provided so that they are in the context of the Midland Rate Zone.
- b) Please also confirm that all other responses provided to Questions 1-4 on pages 22-28 have been provided in the context of the Midland Rate Zone only.

OEB Staff Question #17

Ref: IRM Application

Effective In 2018, Newmarket Tay and Midland Power amalgamated to form one entity

- a) Is there still a separate monthly IESO invoice for each rate zone?
- b) Are monthly settlements still being performed individually for each rate zone or are they being done on a combined basis?
- c) Has the monthly settlement processes been streamlined so that each rate zone's settlements are being performed on the same basis, using the same data sources, and following the same true-up processes. Please explain.

OEB Staff Question #18

Ref: Manager's summary - IRM Model, Sheet 3 and Sheet 4

In cell BT43 on Sheet 3 of the IRM model the total LRAMVA balance shows a total claim amount of \$359,009. Furthermore, in cell S23 of Sheet 4 of the IRM model the LRAMVA balance is \$331,347.

Please identify the correct LRAM variance account amount requested for disposition and update the Sheet 3 and/or Sheet 4 of the IRM model.

OEB Staff Question #19

Ref: 2019 IRM Model, Sheet 3

- a. Please provide an explanation as to why the amount in cell BN34 of \$481,053 (approved interest balance for account 1595 (2015)) differs from the OEB's Decision and Rate Order, EB-2017-0060 dated March 22, 2018 of \$488,766.
- b. For accounts 1595 (2012) and 1595 (2015), please explain why the 2.1.7 RRR has not been updated to account for the transfer of the shared tax saving amounts of \$2,644 and \$997 respectively.

c. Explain why Newmarket-Tay Hydro has opted not to dispose of the balance in Account 1595 for the 2015 year.

OEB Staff Question #20

Ref: Tab 6.1a GA Allocation – cell D20 Total Non-RPP Class B consumption Ref: Tab 6.2a CBR B_Allocation – cell D20 Total Class B consumption less WMP

2016

OEB staff is unable to reconcile the data entered in cells D20 in Tab 6.1a and Tab 6.2a. Below is a table that staff prepared showing the "Validation of Data used in class B GA and CBR Allocations". Staff notes a discrepancy for the 2017 consumption figure that is used in the "GA allocation" and "CBR B Allocation" of 2019 IRM rate model as below.

Year the Account 1589 GA Balance Last Disposed

		Total	2017	2016
Total Non-RPP Class B Consumption for Years During Balance Accumulation (Non-RPP Consumption LESS WMP Consumption and Consumption for Class A customers who were Class A for partial or full year)	A	98,510,364	98,510,364	\bigcirc
Transition Customers' Class B Consumption (i.e. full year or partial year)	в	24,135,456	24,135,456	
Transition Customers' Portion of Total Consumption	C=B/A	24.50%		

Please enter the Year the Account 1580 CBR Class B was 2016 Last Disposed.

(Note: Account 1580, Sub-account CBR Class B was established starting in 2015)

Allocation of total Consumption (kWh) between Class B and Class A/B Transition Customers

		Total	2017
Total Class B Consumption for Years During Balance Accumulation (Total Consumption LESS WMP Consumption and Consumption for Class A customers who were Class A for partial or full year)	A	98,510,364	98,510,364
Transition Customers' Class B Consumption (i.e. full year or partial year)	в	24,135,456	24,135,456
Transition Customers' Portion of Total Consumption	C=B/A	24.50%	74,374,908

Table 1 – confirmation of 2017 consumptions

ata used in C	lass B GA and C	BR Allocations	
			Source I26 of tab 4. Billing
Α		178,537,864	Det. for Def-Var
В		108,100,843	Source C26 of tab 6.1 GA
С		-	Source E26 of tab 6.1 GA
D	24,062,506		=+F-E
E	24,135,456		Source D21 of tab 6.1a GA Allocation
F	, ,	48.197.962	Source G26 of tab 6.1 GA
			Input in D20 of tab 6.1a G
G= +B-C-D		84,038,337	Allocation
H=+A-C-D		154.475.358	Input in D20 of tab 6.2a CBR B Allocation
	A B C D E F G= +B-C-D	A B C D 24,062,506 E 24,135,456 F G= +B-C-D	B 108,100,843 C - D 24,062,506 F 24,135,456 F 48,197,962 G= +B-C-D 84,038,337

- a. Please confirm whether or not Newmarket-Tay Hydro agrees with the updated quantities per the Table 1 calculations for 2017 for the Midland rate zone. If not please explain why Newmarket-Tay Hydro believes the values it used in its 2019 IRM Rate Generator Model (Midland) are appropriate. Otherwise please update the 2019 IRM Rate Generator Model accordingly.
- b. Using Table 1, please provide similar calculation for the 2016 year and update the 2019 IRM Rate Generator Model accordingly.

Ref: Tab 5 of LRAMVA workform

- a. Please review the entries submitted in Tables 5-a, 5-b and 5-c for 2015, 2016 and 2017 energy and demand savings. Staff could not validate the 2015, 2016 and 2017 savings submitted, as it appears that gross savings rather than net savings were submitted.
- b. Please re-file the LRAMVA workform with the revised savings values for 2015, 2016 and 2017.

OEB Staff Question #22

Ref: LRAMVA workform

a. Please file a live excel version of the LRAMVA workform for the Midland rate zone. Tab 5 of the LRAMVA workform, as filed, did not include live formulas.

OEB Staff Question #23

Ref: Tab 7 of LRAMVA workform

a. Please update tab 7 of the LRAMVA workform to include projected carrying charges to the effective date of May 1, 2019 in the claim.

OEB Staff Question #24

- a. If Newmarket-Tay Hydro made any changes to the LRAMVA work form as a result of its responses to these LRAMVA questions, please file an updated LRAMVA work form.
- b. Please confirm any changes to the LRAMVA workform in response to these LRAMVA questions in "Table A-2. Updates to LRAMVA Disposition (Tab 2)".