



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

---

January 24, 2019

VIA E-MAIL

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
Toronto, ON

Dear Ms. Walli:

**Re: EB-2018-0056 – Niagara-on-the-Lake (NOTL) EB-2018-0056 2019 Rates  
Interrogatories on Supplemental Evidence of the Vulnerable Energy Consumers Coalition  
(VECC)**

---

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

Yours truly,

Bill Harper/Mark Garner  
Consultants for VECC/PIAC

Mr. Jeff Klassen, Vice President, Finance NOTL  
[jklassen@notlhydro.com](mailto:jklassen@notlhydro.com)

For interrogatory clarifications please contact Mark Garner at 647-408-4501 or [markgarner@rogers.com](mailto:markgarner@rogers.com)

|                  |                            |
|------------------|----------------------------|
| REQUESTOR NAME   | VECC                       |
| TO:              | Niagara-on-the-Lake (NOTL) |
| DATE:            | January 24, 2019           |
| CASE NO:         | EB-2018-0056               |
| APPLICATION NAME | 2019 COS Application       |

---

**NB- Numbering of interrogatories continues from last VECC IR.**

4.0-VECC-50

Reference: Exhibit 4 – Additional Evidence OM&A

- a) Please explain why NOTL filed new evidence with respect to OM&A costs. Specifically explain what new factors or new facts have changed or become known since the filing of the original evidence and which required this update.

2.0-VECC-51

Reference: Exhibit 2 – Additional Evidence

- a) Please file the most current Niagara-on-the-Lake Historic Old Town Heritage Conservation District Plan.
- b) Please file the District Plan Boundary Map.

2.0-VECC-52

Reference: Exhibit 2 – Additional Evidence

- a) Please compare and contrast the underground voltage conversion maps shown at page 7 of the additional evidence with those from the Distribution System Plan in Proceeding EB-2013-0155. Please explain any significant variance in these maps/plans.
- b) Was the area shown in Map 31 of the current DSP for underground conversion for the period 2025-2034 identified in the prior DSP?

2.0-VECC-53

Reference: Exhibit 2 – Additional Evidence / DSP EB-2013-0155

- a) In its DSP from EB-2015-0155 NOTL stated that its long-term direction for 2009-2018 was a “*Requirement to complete the overhead/underground system renewal within a 5/10 year timeframe.*” The Old Town underground conversion was stated to be a priority and take approximately 10 years. Will the underground conversion program be completed as contemplated in 2023? If not please explain why not.

- b) Please compare the response to 2-SEC-18 with the proposed spending on underground plant as provided in the EB-2013-0155 DSP. Specifically please provide a table which show the proposed underground in investment shown in the EB-2013-0155 DSP and associated pro forma continuity schedules from that proceeding with the actual spending as shown in the response to 2-SEC-18. Please explain any variance.
- c) The DSP reviewed by the Board in EB-2013-0155 set out seven Old Town Rebuild Phases to take place between 2014 and 2018 as shown below:

2014

Old Town Rebuild Phase 3 (\$330,000) Johnson - Simcoe to Dorchester Street

2015

Old Town Rebuild Phase 4 (\$385,000) Johnson - Dorchester to Palatine

2016

Old Town Rebuild Phase 5 (\$400,000) Niagara Blvd - Orchard to Lansdowne

2017

Old Town Rebuild Phase 6 (\$400,000) Gage - Simcoe to Dorchester and Dorchester - Gage to Centre

2018

Old Town Rebuild Phase 7 (\$400,000) Centre - Simcoe to Dorchester

- c) Please provide the actual results for each of these phases.
- d) Is the Phase 7 project identified in the prior DSP (Simcoe to Dorchester) the same as that shown in the current DSP at Table 30 and now identified for Phase 7 as F1 Old King 4kV?

5-VECC-54

Reference: Exhibit 2- additional evidence

- a) Please provide the current signed agreement for the proposed adjustment to affiliated debt rates.
- b) If the Affiliated lender notified NOTL of its intent to renegotiate its debt in November of 2018 why did NOTL not update its proposal prior to the proceedings settlement conference of December 10, 2018? What new information has been provided since December 10, 2018 which caused NOTL to now propose to increase the forecast cost of debt to be paid by ratepayers?

**END OF DOCUMENT**