



**ENERGY+ INC.**

1500 Bishop Street, P.O. Box 1060, Cambridge, ON N1R 5X6 • Telephone 519-621-3530 • Fax 519-621-7420  
• Telephone 519-442-2215 • Toll Free 1-877-871-2215 •

February 5, 2019

**Delivered by RESS & Courier**

Ms. Kirsten Walli, Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

**Re: Board File No. EB-2018-0028  
Energy+ Inc. – 2019 Cost of Service Application  
Response to Technical Conference Undertakings**

Dear Ms. Walli:

Please find attached Energy+ Inc.'s Responses to Technical Conference Undertakings, which were filed on RESS in accordance Procedural Order No. 7 with respect to the above noted proceeding.

Two hard copies of the responses to technical conference undertakings are being couriered to the OEB's offices.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "SH", is positioned above the typed name of Sarah Hughes.

Sarah Hughes, CPA, CA, C.Dir  
Chief Financial Officer  
[shughes@energyplus.ca](mailto:shughes@energyplus.ca)

c.c. Borden Ladner Gervais, John A.D. Vellone  
Intervenors of Record



**Energy+ Inc.**

**EB-2018-0028**

**Response to  
Technical Conference  
Undertakings**

**February 5, 2019**

**UNDERTAKING NO. JTC1.1:**

ENERGY+ TO REVIEW THE REVENUE REQUIREMENT BY CUSTOMER CLASS TO CALCULATE A PERCENTAGE ALLOCATION OF THE REVENUE REQUIREMENT ATTRIBUTABLE TO CLASSES THAT WERE ON THE BI-MONTHLY BILLING THAT WERE LATER CONVERTED TO MONTHLY BILLING

**RESPONSE**

The following table calculates an estimate of the percentage allocation of the 2014 revenue requirement for the CND service territory attributable to classes that were converted from bi-monthly to monthly billing.

Rate Class	Distribution Revenue Requirement /1	Estimated Bi-Monthly Billing Allocation /2	Estimated Distribution Revenue Attributed to Bi-Monthly Customers
Residential	\$ 13,473,027	92%	\$ 12,429,698
GS < 50 kW	\$ 2,894,872	39%	\$ 1,116,251
Total			\$ 13,545,949

*Sources:*

*/1 2014 Cost Allocation Model EB-2014-0116*

*/2 Allocation estimates provided in response to Staff TCQ 2. Residential customers adjusted to remove customers on equal payment plan. GS < 50 kW adjusted to remove consumption already billed on a monthly basis.*

**UNDERTAKING NO. JTC1.2:**

ENERGY+ TO FILE COPIES OF REVENUE REQUIREMENT WORK FORM ASSOCIATED WITH THE TWO SCENARIOS AS REFERRED TO IN TCQ 75B AND D.

**RESPONSE**

The revenue requirement work forms referred to in VECC TCQ 75 contain confidential information and were distributed to all of the parties that have executed a Declaration and Undertaking on January 23, 2019.

The files were redistributed on February 5, 2019 to ensure the files were received by the parties.

**UNDERTAKING NO. JTC1.3:**

ENERGY+ TO PROVIDE THE BILL IMPACT APPENDIX IN AN EXCEL FORMAT.

**RESPONSE**

The bill impact appendix has been attached in Excel format in the file named “2019 EnergyPlus  
- Appendix TCQ SEC 11.xlsx”

**UNDERTAKING NO. JTC1.4:**

ENERGY+ TO CONFIRM WHETHER FOR EMBEDDED HONI NO. 2, THAT RTSR CHARGES DO NOT APPLY.

**RESPONSE**

Energy+ confirms that RTSR (Retail Transmission Service Rates) charges from Energy+ to embedded HONI NO. 2 should not apply.

The supply arrangement for HONI NO. 2 is described in detail in Response to Interrogatory 7-VECC-47(a) (refer to pages 114 to 117) dated September 14, 2018. HONI owns the main line 27.6kV feeders 12M21 and 12M22 at the Brant Transformer Station ("Brant TS").

The transmission charges are the responsibility of HONI at the Brant TS for the complete feeders. Energy+ confirms that HONI invoices the RTSR charges to Energy+ for Energy+'s portion only of the total feeder load on 12M21 and 12M22.

As a result of this arrangement, Energy+ should not apply RTSR charges to HONI No. 2.

In responding to this Technical Conference Undertaking, Energy+ noted certain inconsistencies in the Application and Responses to Interrogatories with respect to the RTSR Charges as follows:

- Energy+ computed an RTSR Network and RTSR Connection rate for HONI No. 2 at Exhibit 8, Appendix 8-1 Summary of RTSR Page 32 of 157.
- In the RTSR Workform for Brant County Service Territory, Energy+ included the 2019 load for HONI No. 2 in computing an RTSR rate for the Embedded Distributor HONI No. 2 class.
- In Appendix 8-4: Bill Impacts, Page 145 or 157 the Appendix 2-W Bill Impacts for HONI #2 shows Nil rates for RTSR Network and RTSR Connection charges to reflect the supply arrangement with HONI No. 2.

**Responses to Technical Conference Undertakings**

- Response to Staff Interrogatories 8-Staff-87 e) Energy+ updated the RTSR Rate Calculation, however, incorrectly included the 2019 load for HONI No. 2 and computed an RTSR rate for the Embedded Distributor HONI No. 2.
- In Response to VECC-TCQ-78 Energy+ was asked to confirm that all customer classes, including the Embedded Distributors are assessed RTSR charges. In this response, Energy+ confirmed and cited the Response to Staff Interrogatory 8-Staff-87 e) where the RTSR rates were computed for the Embedded Distributor HONI No. 2.

Energy+ should not apply RTSR Network and Connection charges to Embedded Distributor HONI No. 2 based upon the fact that HONI only applies the RTSR Network and Connection to Energy+'s portion of the load on feeders 12M21 and 12M22.

Energy+ has prepared a revised Energy+ RTSR Workform for the Brant Service Territory and an updated Harmonized RTSR Workform to reflect this revision. The excel files are attached as part of the Response to Undertaking JTC1.4.

2019 EnergyPlus\_RTSR\_Workform\_BCP\_JTC1.4.xlsm

2019 EnergyPlus\_RTSR\_Workform\_Harmonized\_JTC1.4.xlsm

The following is a summary of the revised Harmonized RTSR Rates:

**Energy+ Inc.**  
**EB-2018-0028**  
**Responses to Technical Conference Undertakings**

**Table: Undertaking JTC 1.4: Revised RTSR Network and Connection Rates - Harmonized**

Network - CND Service Territory	Loss Factor	kWh/kW	2019 Rate	\$	Network - Brant Service Territory	Loss Factor	kWh/kW	2019 Rate	\$	Network - Energy+	kWh/kW	2019 Rate	\$
Residential	1.0307	401,740,257	0.0057	\$ 2,292,222	Residential	1.0307	73,873,004	0.0068	\$ 500,798	Residential	475,613,262	0.0059	\$ 2,793,019
GS< 50kW	1.0307	157,411,270	0.0050	\$ 786,266	GS < 50 kW	1.0307	42,507,551	0.0062	\$ 264,546	GS < 50 kW	199,918,821	0.0053	\$ 1,050,812
GS > 50-999 kW (Non Interval)	1.0307	467,480	3.2240	\$ 1,507,141	GS > 50-999 kW (Non Interval)	1.0307	72,991	2.4743	\$ 180,600	GS > 50-999 kW (Non Interval)	540,470	3.1227	\$ 1,687,741
GS > 50-999 kW	1.0307	891,241	3.2240	\$ 2,873,334	GS > 50-999 kW (Interval)	1.0307	136,403	2.6246	\$ 358,010	GS > 50-999 kW (Interval)	1,027,644	3.1444	\$ 3,231,344
GS >1000-4999 kW	1.0204	473,291	2.4486	\$ 1,158,899	GS > 1000 - 4999	1.0204	115,357	2.6277	\$ 303,118	GS > 1000 - 4999	588,648	2.4837	\$ 1,462,017
Large users	1.0045	330,833	2.3204	\$ 767,652	Large users	1.0045			\$ -	Large users	330,833	2.3204	\$ 767,652
Street Lighting	1.0307	9,896	1.6202	\$ 16,034	Street lighting	1.0307	1,049	1.8663	\$ 1,958	Street lighting	10,945	1.6438	\$ 17,992
Sentinel Lighting	1.0307	-		\$ -	Sentinel lighting	1.0307	343	1.8238	\$ 625	Sentinel lighting	343	1.8238	\$ 625
Unmetered Scattered Load	1.0307	2,123,009	0.0050	\$ 10,604	Unmetered	1.0307	220,755	0.0062	\$ 1,374	Unmetered	2,343,765	0.0051	\$ 11,978
Embedded WNH	1.0204	114,657	2.3204	\$ 266,045		1.0204			\$ -	Embedded WNH	114,657	2.3204	\$ 266,045
Embedded HON	1.0204	24,387	2.3204	\$ 56,588		1.0204			\$ -	Embedded HON	24,387	2.3204	\$ 56,588
					Embedded - Brantford		1,075	2.6246	\$ 2,821	Embedded - Brantford	1,075	2.6246	\$ 2,821
					Embedded - HON #1		29,011	2.6246	\$ 76,143	Embedded - HON #1	29,011	2.6246	\$ 76,143
					Embedded - HON #2		102,973	-	\$ -	Embedded - HON #2	102,973	-	\$ -
<b>Total</b>		<b>563,586,322</b>		<b>9,734,785</b>	<b>Total</b>		<b>117,060,512</b>		<b>1,689,993</b>	<b>Total</b>	<b>680,646,834</b>		<b>11,424,778</b>

  

Connection - CND Service Territory	Loss Factor	kWh/kW	2019 Rate	\$	Connection - Brant Service Territory	Loss Factor	kWh/kW	2019 Rate	\$	Connection - Energy+	kWh/kW	2019 Rate	\$
Residential	1.0307	401,740,257	0.0044	\$ 1,756,776	Residential	1.0307	73,873,004	0.0042	\$ 307,933	Residential	475,613,262	0.0043	\$ 2,064,709
GS< 50kW	1.0307	157,411,270	0.0041	\$ 641,413	GS < 50 kW	1.0307	42,507,551	0.0035	\$ 150,342	GS < 50 kW	199,918,821	0.0040	\$ 791,756
GS > 50-999 kW (Non Interval)	1.0307	467,480	2.4694	\$ 1,154,396	GS > 50-999 kW (Non Interval)	1.0307	75,230	1.4920	\$ 112,247	GS > 50-999 kW (Non Interval)	542,710	2.3339	\$ 1,266,643
GS > 50-999 kW (Interval)	1.0307	891,241	2.4694	\$ 2,200,834	GS > 50-999 kW (Interval)	1.0307	140,588	1.6488	\$ 231,802	GS > 50-999 kW (Interval)	1,031,829	2.3576	\$ 2,432,635
GS >1000-4999 kW	1.0204	473,291	1.9379	\$ 917,189	GS > 1000 - 4999	1.0204	115,357	1.6357	\$ 188,685	GS > 1000 - 4999	588,648	1.8787	\$ 1,105,874
Large users	1.0045	405,209	1.6106	\$ 652,629	Large users	1.0045			\$ -	Large users	405,209	1.6106	\$ 652,629
Street Lighting	1.0307	9,896	1.2409	\$ 12,280	Street lighting	1.0307	1,049	1.1533	\$ 1,210	Street lighting	10,945	1.2325	\$ 13,490
Sentinel Lighting	1.0307	-		\$ -	Sentinel lighting	1.0307	343	1.2056	\$ 413	Sentinel lighting	343	1.2056	\$ 413
Unmetered Scattered Load	1.0307	2,123,009	0.0041	\$ 8,651	Unmetered	1.0307	220,755	0.0035	\$ 781	Unmetered	2,343,765	0.0040	\$ 9,432
Embedded WNH	1.0204	114,657	1.9727	\$ 226,182					\$ -	Embedded WNH	114,657	1.9727	\$ 226,182
Embedded HON	1.0204	24,387	1.9727	\$ 48,109					\$ -	Embedded HON	24,387	1.9727	\$ 48,109
					Embedded - Brantford	1.0204	1,075	1.6488	\$ 1,772	Embedded - Brantford	1,075	1.6488	\$ 1,772
					Embedded - HON #1	1.0204	29,011	1.6488	\$ 47,833	Embedded - HON #1	29,011	1.6488	\$ 47,833
					Embedded - HON #2	1.0204	102,973	-	\$ -	Embedded - HON #2	102,973	-	\$ -
<b>Total</b>		<b>563,660,698</b>		<b>7,618,459</b>	<b>Total</b>		<b>117,066,937</b>		<b>1,043,018</b>	<b>Total</b>	<b>680,727,635</b>		<b>8,661,477</b>

Note: kWh/KW for Large User class were previously revised based on Response to VECC-TCQ-80.

**UNDERTAKING NO. JTC1.5:**

ENERGY+ TO ADVISE THE ACCOUNT NUMBER OR SUB ACCOUNT NUMBER WITH PTS AND CTS, AND THE ACCOUNT OR SUB ACCOUNT WHERE THE COSTS OF PTS AND CTS ARE IDENTIFIED.

**RESPONSE**

In Response to Technical Conference TMMC-IR-1 (c) (iv), Energy+ identified that the PTs and CTs at the Preston TS are used to provide distribution service to TMMC as well as other Energy+ customers.

In Response to TMMC-IR-2 d), Energy+ provided Table TMMC-IR-2d) that summarized the assumed estimated direct costs included in the cost allocation scenario in Response to Technical Conference TMMC-2a). The PTs and CTs were not specifically identified in this table.

In providing the Response to this Undertaking, Energy+ has undertaken a review of its accounting records with respect to the upgrade of the former Cambridge and North Dumfries Hydro Inc. ("CNDHI") revenue metering at Preston TS whereby the metering, including CTs and PTs, was upgraded to 230 kV in 2003. At that time, the costs incurred for the metering upgrade were included in a regulatory asset account (Account 1508). The regulatory asset balance was subsequently approved by the OEB for disposition as part of the OEB's Decision and Order in the former CNDHI Rate Application (EB-2005-0343).

As a result of the treatment as a Regulatory Asset, and subsequent recovery, the costs of the CTs and PTs are not included in any of the property, plant, and equipment accounts of Energy + Inc.

**UNDERTAKING NO. JTC1.6:**

ENERGY+ TO PROVIDE A BREAKOUT OF HOW MUCH OF THE 507 IS RELATED TO HYDRO ONE ST CHARGES AND HOW MUCH COMES FROM BRANTFORD.

**RESPONSE**

Energy+ provided the 2019 LV revenue of \$507,967.

(Reference: Response to Technical Conference VECC-TCQ-77 a)

The breakdown of the LV costs between Hydro One and Brantford Power is \$355,939 of costs from Hydro One and \$152,028 from Brantford.<sup>1</sup>

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<sup>1</sup> EB-2018-0028 Technical Conference Transcript, Page 48, Lines 9 and 10.

**UNDERTAKING NO. JTC1.7:**

ENERGY+ TO CONFIRM WHETHER THERE ARE NEW INCREMENTAL STREETLIGHT ADDITIONS INCLUDED IN THE LRAM VA THAT WERE NOT PART OF THE JANUARY 2016 SET OF STREETLIGHTS.

**RESPONSE**

Energy+ did not adjust the LRAMVA claim computation for any incremental streetlight additions that occurred after January 2016 for streetlight conversions in the Brant service territory.

In the spreadsheet provided in response to Staff TC 5\_2, column D, the number of streetlight lamps in June 2016 before the retrofit program were 2,640 and after were 2,927 in November 2016. The increase in the number of streetlights suggests some natural growth. The number of bulbs in February 2017 (sum of column K) is 2,803 lamps, at least in part because of the transfer of 124 streetlights to the City of Brantford. That transfer is explicitly accounted for in the calculation.

Energy+ calculated the LRAMVA claim by comparing the total streetlight billed demand before the project commenced to the total streetlight billed demand at various stages during the project. Energy+ was unable to distinguish between the CDM savings and the incremental streetlight additions.

The billed demand at the various stages of the project capture both the reductions from CDM savings and the increase in demand from the growth in new streetlights. Including the new additions would increase the total demand billed and reduce the overall CDM demand savings computed. This results in a lower lost revenue calculation than if the additional streetlights had been removed from the computation.

**UNDERTAKING NO. JTC1.8:**

ENERGY+ TO REVIEW AND DETERMINE WHETHER AN UPDATE OF THE LRAM VA WORK FORM NEEDS TO BE FILED.

**RESPONSE**

The BCP LRAMVA workform has been updated and attached in Excel format in the file named “EnergyPlus\_BCP\_OEB LRAMVA work form v3.53 JTC1.8.xlsb”

The following changes have been made to the model:

- The 2017 streetlight persistence of net kW reductions was updated from 1,903 kW to 1,896 kW
- The 2016 streetlight net kW reduction was updated to include reductions from July to October, increasing the amount from 350.22 kW to 458.86 kW
- The carrying charge interest rate for Q4 2018 has been updated to the actual OEB prescribed rate.

The changes identified above result in an increase to the LRAMVA claim of \$4,936.