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June 10, 2019

VIA E-MAIL

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

Dear Ms. Walli:

**Re: EB-2018-0264 –EPCOR Southern Bruce 2019-2028 Rate Plan
Interrogatories 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,

A handwritten signature in black ink, appearing to read 'M Garner', is written in a cursive style.

Mark Garner
Consultants for VECC/PIAC

Email:

Mr. Bruce Brandell, Director Commercial Services, EPCOR Utilities Inc.
bbrandell@epcor.com

For interrogatory clarifications please contact Mark Garner at 647-408-4501 or markgarner@rogers.com

REQUESTOR NAME	VECC
TO:	EPCOR Southern Bruce
DATE:	June 10, 2019
CASE NO:	EB-2018-0264
APPLICATION NAME	South Bruce 2019-2028 Rate Plan

1.0 EXHIBIT 1 – ADMINISTRATION

1.0-VECC-1

Reference: E2/T2/S1/ pg. 62

- a) Please compare/contrast the proposed scorecard with that agreed to recently by EPCOR/ENGLP in EB-2018-0336.
- b) Please compare/contrast the proposed scorecard with that most recently approved for Union/Enbridge.

2.0 EXHIBIT 2 – RATE BASE

2.0-VECC-2

Reference: E2/T2/S1

- a) Is it still EPCOR's expectation to have gas service for Kincardine by the beginning of the 2019 winter season?
- b) Has Union (Enbridge) begun construction on the Dornoch Meter Station?

3. EXHIBIT 3 – OPERATING REVENUES

3.0-VECC-3

Reference: 3/T1/S1/pg.15

- a) What is the time period for which EPCOR will not charge any connection fees? Is this term set out in the Utility's terms of service or otherwise in the proposed tariff of the Utility?

3.0-VECC-4

Reference: 3/T1/S3pg. 3

- a) Please clarify what is mean by “line strikes” as noted in footnote 11 at this reference.

4 EXHIBIT 4 – Operating Expenses

4.0-VECC-5

Reference: E3/T1/S1/pg. 14 & E4/T3/S1/ EPCOR Gas Supply Plan

- a) In EPCOR’s view would the availability of M9 service be preferable to Union’s (Enbridge) proposed M17 service? Please explain why one might be preferable to the other.
- b) If M9 service were available to EPCOR South Bruce how might this alter the gas supply plan?
- c) Does Union (Enbridge) have a Board approved M17 Rate? If not when is approval for this rate expected?

4.0-VECC-6

Reference: E4/T2/S1/ Service Level Agreement (SLA)

- a) Has EPCOR provided Schedule “A” a list of the contract services to the SLA provided at the above reference? If not please provide this schedule.

7 EXHIBIT 7 – Cost Allocation

7.0 -VECC-7

Reference: E7/T1/S1/pg.15

- a) Please explain why the proposed rates are not being adjusted to bring revenue-to-cost-ratios for all four class to 1 or near 1.

8 EXHIBIT 8- Rate Design

8.0-VECC-8

Reference: E8/T2/S1/pg.23- Conditions of Service

- a) Using Table 20 filed at page 27 EPCOR/ ENGLP's EB-2018-0336 recently filed settlement agreement please add a column shown EPCOR Southern Bruce Summary of Service and Miscellaneous Charges.
- b) Please explain the rationale for any differences in the charges as between the two Utilities in these charges.

9 EXHIBIT 9 – Deferral and Variance Accounts

9.0-VECC-9

Reference: E9/T1/S1/pg.5

- a) Please confirm (or correct) that the Regulatory Expense Deferral Account (REDA) is to capture only those regulatory costs imposed upon EPCOR. That is, the account will not record regulatory costs incurred for applications filed by EPCOR South Bruce for rate changes or other purposes.

9.0-VECC-10

Reference: E9/T1/S1/pg.5

- a) What is the reason for seeking a Municipal Tax Variance Account (MTVA)? For example, EPCOR Southern Bruce is not seeking variance accounts for potential changes to other types of taxes (e.g. income) or tax rates.
- b) Why does EPCOR believe this account will attract material balances?

END OF DOCUMENT