



July 12, 2019

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

Re: EnWin Utilities Ltd. 2020 Cost of Service Electricity Rate Application  
AMPCO's Interrogatories  
Board File No. EB-2019-0032

Dear Ms. Walli:

Attached please find AMPCO's interrogatories in the above proceeding.

Please do not hesitate to contact me if you have any questions or require further information.

Sincerely yours,

*(Original Signed By)*

Colin Anderson  
President  
Association of Major Power Consumers in Ontario

Copy to: EnWin Utilities Ltd.

**EB-2019-0032**

**EnWin Utilities Ltd.**

**Application for electricity distribution rates and other  
charges beginning January 1, 2020**

**AMPCO Interrogatories**

1-AMPCO-1

Exhibit 1: Administration P19

Please provide the affiliation of each of the five independent Directors of the Board.

1-AMPCO-2

Exhibit 1: Administration

Please provide a copy of the business plan or other correspondence that was approved by the ENWIN's Board of Directors regarding the investment levels in this application.

1-AMPCO-3

Exhibit 1: Administration

Please update Chapter 2 Appendices with 2018 actuals and 2019 forecast.

2-AMPCO-4

Exhibit 2: Rate Base P45

The evidence indicates System Renewal expenditures in 2009 were \$1,059,664 greater than originally filed in the 2009 Cost of Service. Additional 4 kV projects (22F1 and 22F9) were undertaken resulting in an expenditure increase of \$300,898. Several other areas exceeded budget estimates, such as subdivisions, cable replacements and manhole rebuild expenditures.

- a) Please explain the need to undertake additional 4 kV projects.
- b) Please explain the reasons why several other areas exceeded budget estimates.

## 2-AMPCO-5

### Exhibit 2: Rate Base P51

The evidence indicates significant expenditures were made in the 27.6 kV systems during 2015. As well, a one-time update of pole inspection database was undertaken as that database was in poor condition and adversely affecting ENWIN's ability to efficiently manage that asset type. These expenditures assisted in the increase in the investment category in 2015.

- a) Please explain the need for increased expenditures in the 27.6 kV systems during 2015.
- b) Please explain how the database was adversely affecting ENWIN's ability to efficiently manage that asset type.

## 2-AMPCO-6

### Exhibit 2: Rate Base P52

The evidence indicates the decrease in System Renewal expenditures in 2016 was due to a reduced investment in the planned pole replacements for 2016. Station equipment investments were also reduced during the year.

Please explain why planned pole replacements was decreased in 2016.

## 2-AMPCO-7

### Exhibit 2: Rate Base P52

The evidence indicates the anticipated increase in System Renewal in 2018 is primarily due to increased investment in the underground transformer sustainment program as well as the underground cable sustainment program for subdivisions.

- a) Please explain the need for the increased investment in the underground transformer sustainment program as well as the underground cable sustainment program for subdivisions.
- b) Please discuss 2018 forecast spend compared to actuals.

## 2-AMPCO-8

### Exhibit 2: Rate Base P52

The evidence indicates the anticipated increase in System Renewal in 2019 is primarily due to increased investment in the Pole Sustaining program, specifically 27.6kV pole replacements,

and the underground Switching Unit Vault Sustainment Program.

Please explain the need for the increased investments.

2-AMPCO-9

Exhibit 2: Rate Base P63

With respect to Appendix 2-G, Service Reliability and Quality Indicators, please add 2018 to the table.

2-AMPCO-10

Exhibit 2: Rate Base P63 Table 2-39

Please add 2018 data to Table 2-39.

2-AMPCO-11

Exhibit 2: Rate Base Attachment 2-A P14

The Kinectrics Asset Condition Assessment was completed on April 4, 2018.

Please confirm the vintage of the asset data used in the DSP.

2-AMPCO-12

Exhibit 2: Rate Base Attachment 2-A P14

ENWIN indicates its asset condition and replacement rates are informed through an ACA, which identifies an FFA plan of assets expected to require attention over 10 years.

- a) Please provide the ACA from EB-2010-0079.
- b) Please provide a copy of the ACA prior to the Kinectrics April 4, 2018 ACA.

2-AMPCO-13

Exhibit 2: Rate Base Attachment 2-A P16

With respect to Radial Branch Backup, please provide the number of projects undertaken for each of the years 2012 to 2018 and forecast for 2019 and 2020.

2-AMPCO-14

Exhibit 2: Rate Base Attachment 2-A P40 Table 4

- a) Please confirm the target date for each measure.
- b) Please advise if SAIDI and SAIFI excludes Major Event Days and Loss of Supply.

2-AMPCO-15

Exhibit 2: Rate Base Attachment 2-A P45 Table 8

- a) Please provide the number of power quality complaints by year that were due to a natural part of the system operating.
- b) Please provide the total number of Power Quality Complaints in 2018 and 2019 to date and the number due to a natural part of the system operating.

2-AMPCO-16

Exhibit 2: Rate Base Attachment 2-A P45 Table 9

Please provide the worst performing feeders for the years between 2016 to 2018.

2-AMPCO-17

Exhibit 2: Rate Base Attachment 2-A P50

Please provide the number of Crew Visits and Opportunities for Improvement in 2018.

2-AMPCO-18

Exhibit 2: Rate Base Attachment 2-A P52

Please provide the total number of outages for each of the years 2008 to 2018.

2-AMPCO-19

Exhibit 2: Rate Base Attachment 2-A P56

Please provide the SAIFI values for each of the years 2008 to 2018 excluding Major Events Days, Loss of Supply and Scheduled Outages.

2-AMPCO-20

Exhibit 2: Rate Base Attachment 2-A P57

Please provide the SAIDI values for each of the years 2008 to 2018 excluding Major Events Days, Loss of Supply and Scheduled Outages.

2-AMPCO-21

Exhibit 2: Rate Base Attachment 2-A P58

Please provide the total number of momentary outages for each of the years 2008 to 2018.

2-AMPCO-22

Exhibit 2: Rate Base Attachment 2-A P60

Please complete the following table:

<b>Defective Equipment</b>	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
% Contribution to SAIFI										
% Contribution to SAIDI										

2-AMPCO-23

Exhibit 2: Rate Base Attachment 2-A P64

- a) With respect to SAIFI, for each of the years 2013 to 2018, please provide a breakdown of the causes of defective equipment.
- b) With respect to SAIDI, for each of the years 2013 to 2018, please provide a breakdown of the causes of defective equipment.

2-AMPCO-24

Exhibit 2: Rate Base Attachment 2-A P64

- a) Please provide the calculation of the 3.07% and 1.67%.

- b) Please provide the outage statistic result for 2018.
- c) Please explain how the target of 5% was derived.

2-AMPCO-25

Exhibit 2: Rate Base Attachment 2-A P67

For each of the Program/Projects listed in Table 21, please identify the Program/Projects that are new since 2009 and provide the year they were initiated and why.

2-AMPCO-26

Exhibit 2: Rate Base

Please provide the percentage of the capital budget undertaken by external resources for the years 2009 to 2018.

2-AMPCO-27

Exhibit 2: Rate Base Attachment 2-A Appendix 2-AA

- a) Line 30 - Please separate the planned and reactive transformer investment costs for each year.
- b) Line 40 Conductor Upgrades – The 2020 budget reflects \$200,000 whereas the Conductor Upgrade Project – 23M2 LTP1 at Appendix F reflects \$350,000 in 2020. Please reconcile.

2-AMPCO-28

Exhibit 2: Rate Base Attachment 2-A Appendix 2-AA

- a) Line 28 27.6 kV Pole Replacements – Please provide the number of poles replaced for each of the years 2009 to 2018 and forecast for 2019 and 2020.
- b) Line 29 Planned Cable Replacements – Please provide the metres of cable replaced for each of the years 2009 to 2018 and forecast for 2019 and 2020.
- c) Line 30 Planned & Reactive Transformers – Please provide the number of transformers replaced on a planned basis compared to a reactive basis for each of the years 2009 to 2018 and forecast for 2019 and 2020.

- d) Line 31 – Reactive Pole Replacements: Please provide the number of poles replaced on a reactive basis for each of the years 2009 to 2018 and forecast for 2019 and 2020.
- e) Line 32 Reactive Equipment Replacements – Please explain how the Reactive Equipment Replacements 2020 budget was derived.
- f) Line 34 Manhole Rebuilds – Please provide the number of Manhole Rebuilds for each of the years 2009 to 2018 and forecast for 2019 and 2020.
- g) Line 37 Other Renewal – Please explain how the Other Renewal 2020 budget was derived and provide a breakdown.
- h) Line 48 Other - Please explain how the Other 2020 budget was derived and provide a breakdown.

## 2-AMPCO-29

### Exhibit 2: Rate Base Attachment 2-A Appendix A

The Kinectrics report indicates the historic removal information was available for the asset groups that are outside stations and installed either overhead or underground, thus allowing build-up of their specific degradation curves.

- a) Please explain why it is important to collect asset removal information and describe the type of information collected.
- b) Please explain how historic removal information is used to derive specific degradation curves.

## 2-AMPCO-30

### Exhibit 2: Rate Base Attachment 2-A Appendix A

Please provide ENWIN's response to the recommendations listed on page vi and vii.

## 2-AMPCO-31

### Exhibit 2: Rate Base Attachment 2-A Appendix A P6

- a) Please list ENWIN's assets that have low consequences of failure.
- b) Please list the assets that ENWIN runs to failure.



## 2-AMPCO-32

### Exhibit 2: Rate Base Attachment 2-A Appendix A P14

- a) Page 14 - Please provide an excel version of Table 1.
- b) Page 14 - For each of the assets listed in Table 1, please provide an excel table with the number of inservice failures for each of the years 2009 to 2018.
- c) Page 15 – please provide an excel verison of Table 3.

## 2-AMPCO-33

### Exhibit 2: Rate Base Attachment 2-A Appendix A P17

- a) For each of the assets listed in table 3, please provide the asset population and the number replaced for each of the years 2009 to 2018 in order to calculate an annual replacement rate.
- b) Please provide an excel version of the table.

## 2-AMPCO-34

### Exhibit 2: Rate Base Attachment 2-A Appendix B P3

Please provide the total number of Key Accounts.

## 4-AMPCO-35

### Exhibit 4: Operating Expenses Appendix 2-K

- a) Please provide a version of 2-K that shows a breakdown of Executive, Management, Union, Non-Union and temporary FTEs.
- b) Please provide incentive pay per year.
- c) Please provide overtime costs per year.
- d) Please provide the percentage of compensation costs that are capitalized for each year.
- e) Please provide the total number of hours worked per year (excluding overtime).
- f) Please provide the total number of overtime hours worked per year.

- g) Please provide ENWIN's resource utilization rate for the years 2013 to 2018 and provide the calculation.
- h) Please provide ENWIN's vehicle utilization rate for the years 2013 to 2018 and provide the calculation.

4-AMPCO-36

Exhibit 4: Operating Expenses

Please provide the percentage of OM&A that is undertaken by external resources for each of the years 2009 to 2018 and forecast for 2019 and 2020.

4-AMPCO-37

Exhibit 4: Operating Expenses Appendix 2-JB

- a) Please provide a breakdown of Professional Fees and Consulting costs for 2018 and 2020.
- b) Please provide a breakdown of Outside Services in 2020.
- c) Please provide a breakdown of Other Material Items in 2020.

4-AMPCO-38

Exhibit 4: Operating Expenses

Please provide the number of vacancies per month for 2018 and forecast for 2019.

4-AMPCO-39

Exhibit 4: Operating Expenses

Please provide the number of retirements for the years 2013 to 2018.

7-AMPCO-40

Exhibit 7: Cost Allocation P4

ENWIN indicates the proposed elimination of the Large Use – Ford Annex rate class will result in the movement of the sole customer in this class to the Large Use – 3TS rate class. This elimination allows ENWIN to align its remaining three Large Use customers served by dedicated transformer stations into a single consistent rate class.

- a) Please provide a description of the drivers to eliminate the Large Use – Ford Annex rate class.
- b) Please outline all discussions ENWIN has had with the Large Use – Ford Annex customer regarding the elimination of the Large Use – Ford Annex rate class.
- c) Please provide copies of all correspondence between ENWIN and the Large Use – Ford Annex customer regarding the elimination of the Large Use – Ford Annex rate class.
- d) Please confirm the Large Use – Ford Annex customer is in full agreement with ENWIN’s proposal to eliminate the Large Use – Ford Annex rate class.
- e) Please provide a status quo 2020 cost allocation model before the elimination of the Large Use – Ford Annex rate class and the movement of the sole customer in this class to the Large Use – 3TS rate class.
- f) Please provide the cost allocated in the 2020 Study in part 9 e) to each rate class
- g) Please provide the proposed monthly rates for the Large Use – Ford Annex rate class before and after implementation of the change.

#### 7-AMPCO-41

##### Exhibit 7: Cost Allocation P7

With respect to billing and collecting, please explain the work required to prepare a bill for a high volume customer (GS>50-4,999 kW and Large Use) compared to a residential customer.

#### 7-AMPCO-42

##### Exhibit 7: Cost Allocation P9

ENWIN indicates it is not aware of any reason for the load profiles to have materially changed between the classes. As a result, ENWIN has not updated its load profiles at this time.

- a) Please explain why ENWIN believes the load profiles have not materially changed between the classes.
- b) Please explain the level of effort to update the load profiles at this time.

#### 7-AMPCO-43

##### Exhibit 7: Cost Allocation P9 Table 7-7

Please explain how the scaling factors used by rate class were derived.

7-AMPCO-44

Exhibit 7: Cost Allocation P9 Table 7-8

- a) Please provide the allocated cost to the Large Use – Ford Annex rate class from the 2009 Board Approved Cost Allocation Study.
- b) Please provide the allocated cost to the Large Use – 3TS rate class from the 2009 Board Approved Cost Allocation Study.

7-AMPCO-45

Exhibit 7: Cost Allocation P12

Please provide the revenue to cost ratio for the Large Use – Ford Annex rate class The Revenue to Cost ratios reflect the adjusted ratios as approved in EB-2010-0079.

7-AMPCO-46

Exhibit 8: Rate Design P6

Please provide the approved Fixed/Variable Proportions for each rate class in EB-2010-0079.

7-AMPCO-47

Exhibit 8: Rate Design P20

- a) Please provide the distribution bill impacts by rate class excluding deferral and variance account disposition rate riders.
- b) Please provide the distribution bill impacts (excluding rate riders) by rate class if the proposed elimination of the Large Use – Ford Annex rate class was not approved.