

July 15, 2019

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
P.O. Box 2319  
Toronto, Ontario  
M4P 1E4

Dear Ms. Walli:

**Re: EB-2019-0032 – ENWIN Utilities Ltd. – 2020 Rates**

Please find, attached, interrogatories on behalf of the Consumers Council of Canada for ENWIN Utilities Ltd. pursuant to the above-referenced proceeding.

Please feel free to contact me if you have questions.

Yours truly,

*Julie E. Girvan*

Julie E. Girvan

CC: All parties

**INTERROGATORIES FOR ENWIN UTILITIES LTD.**

**FROM THE CONSUMERS COUNCIL OF CANADA**

**RE: EB-2019-0032 – 2020 RATES**

**1-CCC-1**

Ex. 1/p. 6

Please indicate, specifically, where in the Application ENWIN did not follow the OEB's Handbook for Utility Rate Applications dated October 13, 2016 and Chapter 2 of the OEB's Filing Requirements for Electricity Distribution Rate Applications dated July 12, 2018.

**1-CCC-2**

Ex. 1

Please provide all materials provided to ENWIN's Board of Directors when seeking approval of this Application and the underlying budgets.

**1-CCC-3**

Ex. 1

Please list all external reports and consulting engagements that were undertaken in the development of this Application. Please list the costs associated with each engagement and whether the work was the subject of an RFP process.

**1-CCC-4**

Ex. 1/p. 16

Please explain why ENWIN has not rebased since 2009. How were ENWIN's rates set in each year 2010-2018?

**1-CCC-5**

Ex. 1/pp. 26-27 and Ex. 4/p. 12

Please provide all budget directives, memos etc. that were provided to employees regarding the development of the budgets underlying this Application. Please provide a timeline regarding the development of the 2019-2024 Business Plan and the development of the budgets underlying this Application.

**1-CCC-6**

Ex. 1/p. 38

Please provide the actual and Board Approved ROE for ENWIN for each year 2009-2018.

**1-CCC-7**

Ex. 1

Please provide the current status of the Collective Bargaining Agreement negotiations with the IBEW and for the Inside and Outside Bargaining Units.

**1-CCC-8**

Ex. 1/pp.28-30

Is ENWIN using the same load forecast methodology it used in 2009? If not, please explain how the new methodology has changed. Does ENWIN forecast load each year? If so, please provide the actual and forecast load for each year since 2009-2018.

**1-CCC-9**

Ex. 1/p. 28-30

Has ENWIN considered how the cancellation of the Conservation First CDM Framework could impact its load forecast? Has ENWIN considered how further electrification of the transportation sector could impact its over the next five years?

**1-CCC-10**

Ex. 1/p. 32

Please explain why Contributed Capital amounts are significantly higher in 2020 relative to other years.

**1-CCC-11**

Ex. 1/p/. 43

Please provide one schedule setting out distribution rate impacts with and without the DVA rate riders.

**1-CCC-12**

Ex. 1/p. 46

Please provide the total cost of the Innovative Research work and explain how those costs will be recovered.

**1-CCC-13**

Ex. 1/p. 67

Please provide all of ENWIN's Scorecards since 2013.

**4-CCC-14**

Ex. 4/p. 10

Please set out the annual salary and wage increase for the period 2009-2018.

**4-CCC-15**

Ex. 4/p. 27

Please recast the OM&A Programs Table to include 2018 actuals and 2019 budget.

**4-CCC-16**

Ex. 4/Appendix 2-JC

Please provide a detailed break out the Audit, Legal and Consulting budget for 2020 of \$896,526.

**4-CCC-17**

Ex. 4/Appendix 2-JC

Please update Appendix 2-JC to include 2018 actual amounts.

**4-CCC-18**

Ex. 4/Appendix 2-JC

Please explain the significant increase in the Engineering budget for 2020 as compared to the last rebasing year.

**4-CCC-19**

Ex. 4/Ex. 2

Please explain the extent to which ENWIN has built productivity into the 2020 budget for both Capital and OM&A. Please provide a list setting out each specific productivity initiative and the associated savings.

**8-CCC-20**

Ex. 8/pp. 8-10

Please explain if there is any impact on the Residential Rate Class arising out of ENWIN's proposals for Gross load Billing.