



August 1, 2019

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

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: EB-2019-0032
ENWIN Utilities Ltd. Application for Approval of Distribution Rates and Other
Charges Effective January 1, 2020 (the "Application")
Responses to Interrogatories**

Pursuant to Procedural Order No. 1, issued June 21, 2019, please find enclosed ENWIN Utilities Ltd.'s ("ENWIN") responses to interrogatories from the following parties:

- Ontario Energy Board Staff ("OEB Staff");
- Association of Major Power Consumers in Ontario ("AMPCO");
- Consumers Council of Canada ("CCC");
- School Energy Coalition ("SEC"); and
- Vulnerable Energy Consumers Coalition ("VECC").

Updated OEB Models and Work Forms

With its interrogatory responses, ENWIN is enclosing updated versions of the following OEB models and work forms, which encompass updates reflected in the interrogatory responses:

- Chapter 2 Appendices
- GA Analysis Workform
- Revenue Requirement Workform
- PILs Workform
- Cost Allocation Model
- RTSR Workform
- Bill Impacts Model
- DVA Workform
- LRAMVA Workform

Updated 2020 Load Forecast

ENWIN's consultant, Elenchus Research Associates Inc. ("Elenchus"), has updated ENWIN's 2020 load forecast to reflect certain items that have arisen since the filing of

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ENWIN's original Application on April 26, 2019, along with updates identified through the interrogatory process. An updated load forecast model is enclosed. A summary of the updates is attached as Appendix 1.

Request for Confidential Treatment

Pursuant to Section 5 of the OEB's Practice Direction on Confidential Filings, ENWIN requests the Attachments included in response to interrogatory AMPCO – 40 be treated as confidential. ENWIN submits that these attachments are commercially sensitive as they reflect correspondence related to commercial negotiations between ENWIN and one of its customers. As such, the information provided in the Attachments could prejudice the negotiation process that ENWIN has with its customers. The Attachments contain information with respect to price, term and arrangements between ENWIN and its customer, which are commercially sensitive.

Appendix "A" to the Practice Direction sets out the Board's considerations in determining requests for confidentiality. Among those considerations are the following:

- (a)(i) prejudice to any person's competitive position;
- (a)(iii) whether the information could interfere significantly with negotiations being carried out by a party;
- (a)(iv) whether the disclosure would be likely to produce a significant loss or gain to any person; and
- (g) any other matters relating to FIPPA (*the Freedom of Information and Protection of Privacy Act*) and FIPPA exemptions.

With respect to item (g) above, the Board has provided a summary of pertinent FIPPA provisions at Appendix C of the Practice Direction. That summary provides, in part, as follows:

"Under section 17(1), the Board must not, without the consent of the person to whom the information relates, disclose a record where:

- (a) the record reveals a trade secret or scientific, technical, commercial, financial or labour relations information;
- (b) the record was supplied in confidence implicitly or explicitly; and
- (c) disclosure of the record could reasonably be expected to have any of the following effects:
 - i. prejudice significantly the competitive position or interfere significantly with the contractual or other negotiations of a person, group of persons or organization;

...

iii. result in undue loss or gain to any person, group, committee or financial institution or agency;
...”

ENWIN submits that the disclosure of Attachments could reasonably be expected to prejudice ENWIN’s customer’s negotiating position. It could also reasonably be expected to prejudice the economic interest of, significantly prejudice the competitive position of, cause undue financial loss to, and be injurious to the financial interest of the customer.

ENWIN is prepared to provide copies of the Attachments to parties’ counsel and experts or consultants provided that they have executed the Board’s form of Declaration and Undertaking with respect to confidentiality and that they comply with the Practice Direction, subject to ENWIN’s right to object to the Board’s acceptance of a Declaration and Undertaking from any person.

In keeping with the requirements of the Practice Direction, ENWIN is filing two confidential versions of the Attachments in hard copy only. The confidential Attachments have been placed in a sealed envelope marked “Confidential”. The Attachments are marked “Confidential” and printed on yellow paper. ENWIN requests that the unredacted documents be kept confidential.

Should you have any questions, please do not hesitate to contact the undersigned.

Yours very truly,

ENWIN Utilities Ltd.



Per: Paul J. Gleason, BA, LL.M
Director, Regulatory Affairs & Corporate Secretary

Cc: EB-2019-0032 parties
Tina Li (OEB)
Ian Richler (OEB)

ENWIN 2020 LOAD FORECAST UPDATE

EB-2019-0032

EnWin's 2020 load forecast has been updated as follows:

- 2018 data has been added;
- forecast CDM has been revised;
- a Large Use customer that is expected to end service in 2020 has been removed; and
- the kW CDM amounts used in the kW forecast and CDM adjustment have been corrected.

The load forecast now uses a time period of 2009 to 2018. Data from 2008 was largely influenced by the 2007-2008 financial crisis so consumption in those years is not reflective of current consumption trends. The data that was updated includes consumption, demand, CDM, customer counts, weather, and economic data. Data from Statistics Canada had been rebased so 2018 data is scaled to the dataset accessed in November 2018. The economic forecasts have also been updated to reflect the latest major bank provincial forecasts.

The OLS regressions were rerun with data from 2009-2018. No new variables were introduced but, without the influence of lower economic activity in 2008, certain variables were dropped. The time trend and October binary variable were removed from the GS > 50 kW OLS model. Ontario Employment was removed from the Intermediate OLS model and the time trend was removed from the Large Use OLS model.

The 2018 CDM and the CDM forecast has been revised according to the updated Chapter 2 Filing Guidelines to account for the cancellation of the Conservation First Framework. This revision had a significant effect on the 2020 kWh forecast because the CDM adjustment has declined from 187 GWh to 66 GWh. Certain CDM figures that were previously first-year CDM savings have been revised to be first-year savings persisting to 2020.

A significant customer is expected to end service in 2020. This customer has two accounts, a Large Use account and a GS > 50 kW account. Separate OLS regressions and forecasts were produced for the two classes that exclude historic consumption and demand from the lost customer. The 2019 forecast figures are based on data including the customer and 2020 forecast figures are based on data and regressions that exclude the customer. This customer participated in CDM activities until 2015 under its Large Use account. The customer's CDM persisting to 2020 has been removed from the Large Use class' CDM figures for 2020. There is no forecast CDM activity related to this customer.

The original forecast relied on peak kW CDM savings for the CDM Adjustment and persisting CDM-adjusted kW forecast. The kW CDM figures were exclusively for the peak month so they did not reflect 12 months of billed demand. For this reason, the kW CDM adjustment was significantly understated. Consideration of persisting kW CDM has been removed from ratio trends within the kW forecast. The kW CDM adjustment methodology has been revised to be consistent with the methodology that has previously been approved in Elenchus load forecasts. The percentage of forecast kWh CDM savings as a share of the class' 2020 kWh forecast is applied to the class' 2020 kW forecast.