



Wellington North Power Inc.

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ESA # 7012854

February 12th 2020

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

Dear Ms. Walli:

Re: OEB File: EB-2019-0073
2020 Price Cap IR Distribution Rate Application - Wellington North Power Inc.
Applicant Responses to OEB Staff Follow-up Questions

On February 7th 2020, Wellington North Power Inc. (WNP) received two (2) interrogatory follow-up questions from OEB Staff regarding the LDC's 2020 IRM Rate Application (OEB case number EB-2019-0073.) Please find enclosed the Applicant's responses to the questions raised.

An electronic copy of this letter containing responses to the follow-up questions has been filed on the Board's web portal together with an updated GA Analysis Workform.

Should the OEB have questions regarding this matter please do not hesitate to contact me.

Respectfully submitted,

Original Signed By

Richard Bucknall
Regulatory Manager

Wellington North Power Inc.

c.c. Kelli Benincasa - Rates Analyst, OEB

Wellington North Power Inc. (Wellington North Power)

2020 IRM Application

EB-2019-0073

Applicant's Responses to OEB Staff Follow-up Questions

Staff Follow-up Question-1

Ref: Response to Staff Question – 5

GA Workform Adjustment -20200131

In responding to staff question #5, Wellington North Power provided the detailed calculation in the excel file of GA Workform Adjustment to support the reconciling item of #6 – differences in GA IESO posted rate and rate charged on IESO invoice of the GA analysis work form.

Staff notes that the Non-RPP Percentage in Class B GA has been decreased significantly from 56% - 70% prior to July 2018 to 30% starting from July 2018:

	June 2018	July 2018	August 2018	Sept 2018	Oct 2018	Nov 2018	Dec 2018
Non-RPP % in Class B GA	56.55%	30.23%	31.02%	34.05%	33.79%	32.24%	33.35%

- Please explain the reasons for the decrease of the Non-RPP % in Class B GA starting from July 2018.
- Please provide the calculation of the Non-RPP percentage starting from the total metered consumption kWh for the months of June and July 2018.

Wellington North Power Inc. Response:

- The reason for the decrease of the Non-RPP percentage in Class B GA starting from July 2018 is a consequence of four (4) customers switching from Class B to Class A on July 1st 2018. These four customers opted-in to the Industrial Conservation Initiative (ICI) effective July 1st 2018. By opting-in to the ICI program, these four customers are recognized as Class A customers being billed by their share of the actual Global Adjustment, charged by the IESO, based on their individual Peak Demand Factor.

Below is a history of Wellington North Power's (WNP) customers switching from Class B to Class A and vice versa:

Number of Class A Customers (switching from Class B to Class A):

- **2017:** the LDC had two (2) customers who switched from Class B to Class A on July 1st 2017. The customers opted-in to the ICI program for the "Adjustment Period" (billing period) of July 1st 2017 to June 30th 2018.

- **2018:** the LDC had:
 - An additional four (4) customers switched from Class B to Class A on July 1st 2018. These customers opted-in to the ICI Program for the “Adjustment Period” (billing period) of July 1st 2018 to June 30th 2019.
 - The two (2) customers who switched from Class B to Class A on July 1st 2017 also opted-in to the ICI program for the period July 1st 2018 to June 30th 2019.
 - For clarity: from July 1st 2018 to June 30th 2019, the “Adjustment Period” (billing period), WNP had six (6) Class A customers in the ICI program.

Number of Class A Customers Switching to Class B:

There have been no Class A customers switching back to Class B.

- b) The table below shows the calculation of the Non-RPP percentage for the settlement months of June and July 2018:

Settlement Month:		June 2018	July 2018
Settlement Period - From:		01-June-2018	01-July-2018
Settlement Period - To:		30-June-2018	31-July-2018
Calculation	Description	kWh	kWh
A	Total System Load	8,312,326	8,610,575
B	Class A customers	1,959,964	4,194,517
C	Retail Total - MIST meters (excluding Class A)	3,389,935	1,129,293
D	Street Lights	43,064	45,808
E	MicroFIT and FIT	54,890	59,168
F = A-B-C-D+E	Net System Load Shape	2,974,252	3,300,125
G	Non-Designated Load (Retailer-Enrolled accounts)	213,941	218,916
H = F-G	Net System Load Shape for RPP Accounts	2,760,311	3,081,209
I = (F) / (A-B)	RPP Customers	43.45%	69.77%
J = (A-B-H) / (A-B)	Non RPP Customers	56.55%	30.23%
		100.00%	100.00%

Staff Follow-up Question – 2

Ref: Response to Staff Question – 5

GA Workform Adjustment -20200131

GA Analysis Workform

Staff noted that Wellington North Power provided the line loss calculation for all years of 2015 to 2018 but did not update the 2015 and 2016 GA analysis workforms for the reconciling item #7 – Differences in actual system losses and billed TLFs.

- a) Please explain why the GA analysis workforms for 2015 and 2016 were not updated by including this reconciling item of line losses.
- b) Please update the GA analysis workforms for 2015 and 2016 if a) can not be provided.

Wellington North Power Inc. Response:

- a) WNP assumed that since the 2015 and 2016 data had been thoroughly reviewed in previous IRM rate applications, the request for line-loss data in these years was for informational purposes only and not a filing requirement.
- b) WNP has updated the GA Analysis Workform for the years of 2015 and 2016 as required. An updated GA Workform has been filed on the OEB's Board's web portal together with this response.