



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
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Toronto, Ontario
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May 11, 2020
Our File: EB20190261

Attn: Christine Long, Registrar & Board Secretary

Dear Ms. Long:

Re: EB-2019-0261 – Hydro Ottawa Limited 2021-2025 – SEC Interrogatories

We are counsel to the School Energy Coalition (“SEC”). Attached, please find a copy of SEC’s interrogatories.

Yours very truly,
Shepherd Rubenstein P.C.

A handwritten signature in black ink, appearing to read "Mark Rubenstein", is written over a horizontal line.

Mark Rubenstein

cc: Wayne McNally, SEC (by email)
Applicant and intervenors (by email)

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
being Schedule B to the *Energy Competition Act, 1998*, S.O. 1998,
c.15;

AND IN THE MATTER OF an Application by Hydro Ottawa
Limited to the Ontario Energy Board for an Order or Orders
approving or fixing just and reasonable rates and other charges for
the distribution of electricity effective January 1, 2021.

**INTERROGATORIES
ON BEHALF OF THE
SCHOOL ENERGY COALITION**

1-SEC-1

[Ex.1] With respect to COVID-19:

- a. Please provide details regarding the impact COVID-19 has had on Hydro Ottawa's operations to date.
- b. Please provide details regarding the impact COVID-19 is expected to have on assumptions, forecasts and plans that underlie Hydro Ottawa's forecast budgets through the end of 2020. Please provide necessary revisions to those forecasts, as required.
- c. Please provide details regarding the impact COVID-19 is expected to have on the assumptions, forecasts and plans that underlie Hydro Ottawa's budgets for the 2021-2025 Custom IR term. Please provide necessary revisions to those forecasts, as required.
- d. If Hydro Ottawa believes that COVID-19 will have an impact on the assumptions, forecasts, and plans that underlie budgets for the 2021-2025 Custom IR term, but is unable to quantify those impacts at this time, please explain how Hydro Ottawa proposes that they be incorporated into its rate-setting proposal.

1-SEC-2

[Ex.1] Please provide all material provided to Hydro Ottawa's Board of Directors for their approval of this application and the underlying budgets.

1-SEC-3

[Ex.1] Please provide copies of all benchmarking studies, reports, and analyses that Hydro Ottawa has conducted itself, undertaken by a third-party, or participated in, since 2016, that is not already included in the application.

1-SEC-4

[Ex.1] Please provide a copy of Hydro Ottawa's corporate scorecard for each year between 2016 to 2020.

1-SEC-5

[Ex. 1-1-5, p.19] Please provide Table 15 in excel format.

1-SEC-6

[Ex.1-1-10] Please confirm that based on the Hydro Ottawa's proposed rate-setting methodology, there is no stretch or productivity factor applied to any portion of the revenue requirement with the exception of OM&A costs. If confirmed, please explain why this is appropriate.

1-SEC-7

[Ex.1] Please identify all instances where Hydro Ottawa's application deviates from the OEB's Rate Handbook. Please explain why the deviations are appropriate.

1-SEC-8

[Ex.1-1-10] Please explain how the proposed rate-setting methodology, and any customer protections (i.e. ESM, etc.) differ from, what was approved as part of the Hydro Ottawa's last Custom IR application. Please explain why the changes are appropriate and benefit customers.

1-SEC-9

[Ex.1-1-10] Please provide a table that shows for each year of the rate plan, the difference in the forecast revenue collected from base distribution rates under the following different rate-setting methodologies:

- a. Hydro Ottawa's proposed Custom IR rate-setting methodology
- b. Hydro Ottawa's 2015-2020 OEB approved Custom IR methodology (EB-2015-0004)
- c. OEB approved Toronto Hydro-Electric System Limited methodology in EB-2018-0165
- d. OEB approved Hydro One Networks Inc. Distribution methodology in EB-2017-0049
- e. 2021 Cost of Service with 2022-2025 adjusted by way of Price-Cap IR

Please include in your response the live excel spreadsheet showing the calculations.

1-SEC-10

[Ex.1-1-10, p.15] With respect to the inflation forecast:

- a. What is the date of the Conference Board of Canada forecast used by Hydro Ottawa?
- b. Please provide a copy of the most recent Conference Board of Canada forecast available.

1-SEC-11

[Ex.1-1-10, p.21-23] With respect to the proposed growth factor:

- a. [p.21] Please provide a copy of the referenced documents, or a hyperlink if available, included at footnotes 30-31.
- b. [p.23] Hydro Ottawa states: "Hydro Ottawa proposes to employ a scaling factor of 0.35 to determine its growth factor, consistent with the approved approaches for FortisBC and Hydro Québec. The selection of this scaling factor was made by considering the scaling factors used in other jurisdictions and taking into account the substantial growth in

population and customers in the Ottawa area.” Please explain the basis for using a 0.35% factor, including what jurisdictions Hydro Ottawa used, and how the “substantial growth” referred to would result in the specific number chosen.

- c. Please confirm as part of the EB-2015-0004 settlement, Hydro Ottawa agreed to a 0.14% growth factor.
- d. If (c) is confirmed, based on the approved load forecast, what would have been the ‘scaling factor’ that would have resulted in a 0.14% growth factor
- e. [EB-2015-0003, Section II, Tab 1, Ex. F-1, p.6, Section III, Tab 2, F-Energy Probe-6] In EB-2015-0003, PowerStream estimated that their utility specific ‘scaling factor’ was 11.45% (1% increase of customer growth resulted in a 0.1145% increase in OM&A. Please explain why this is not a more appropriate scaling factor to use. Also, please explain why Hydro Ottawa has not attempted to undertake their own specific utility specific analysis, as PowerStream has.
- f. Does Hydro Ottawa believe that conceptually the ideal ‘scaling factor’ should be based on the utility specific costs or a benchmark of costs.

1-SEC-12

[Ex.1-1-1, Attachment A] With respect to the Clearspring Energy Advisors, Economic Benchmarking Study of Hydro Ottawa’s Total Cost and Reliability:

- a. [p.10-11] With respect to the sample:
 - i. The report notes, that specific customer count cut-off used for the Ontario sample was chosen to mirror the cut-off in the US sample. What is the basis for the US sample cut-off?
 - ii. Is the proposed consumer cut-off, customers as of 2018, or in 2002?
 - iii. If the response to part (ii) is 2002, how many additional US distributors would in 2018 have greater than 59,807 customers? Please list them.
 - iv. Please confirm that based on the 2018 OEB Yearbook the following additional utilities had a total of 59,807 customers or more, Veridian Connections Inc., Oakville Hydro-Electric Distribution Inc., Energy+ Inc. and Burlington Hydro Inc.
- b. [p.4] Please update Table 1 using Hydro Ottawa’s 2019 actual information.
- c. [p.12] Please provide a table showing that for each category of excluded costs and for each year, the amounts excluded in each year of the historical data period from each of the Ontario distributors, including Hydro Ottawa, included in the expert’s dataset. For Hydro Ottawa, please also advise the amounts of each of those categories excluded for each of the years 2021-2025.

1-SEC-13

[Ex.1-1-1, Attachment A] With respect to the Clearspring Energy Advisors, Economic Benchmarking Study of Hydro Ottawa’s Total Cost and Reliability:

- a. Please detail all differences in the methodology as between this report and that authored by Mr. Fenrick for: i) Toronto Hydro in EB-2018-0165, ii) Hydro One in EB-2017-0049, and iii) Hydro Ottawa in EB-2015-0004.
- b. [p.17] Please confirm that ‘rural density’ variable Clearspring uses is a business condition variable that is based on service area.
- c. [Decision and Order (EB-2017-0049), p.29] How has Clearspring addressed the OEB’s comments in its decision in Hydro One’s 2018-2022 Custom IR proceeding regarding concerns with the use of service area as a business condition variable for benchmarking?
- d. [p.17] Please confirm that Clearspring uses a ‘congested urban’ variable in its study.
- e. [Decision and Order (EB-2018-0165), p.29] In its decision in Toronto Hydro's 2020-2024 application, OEB found that the "congested urban variable needs further research and refinement before it can be accepted as a meaningful adjustment to the assessment of cost benchmarking performance.” Please explain what additional research and refinement Clearspring has done with respect to the ‘congested urban’ variable.

1-SEC-14

[Ex.1-1-1, Attachment A] SEC seeks a better understanding of the difference between the Clearspring model and that of the PEG model used by the OEB to determine annual stretch factors. For each other Ontario distributor included in Clearspring benchmarking model, please provide a separate table that shows their individual total cost benchmarking results, by providing for each year between 2006 and 2018, their: i) actual total cost, ii) benchmark total costs, and iii) % difference.

1-SEC-15

[Ex.1-1-1, Attachment A] With respect to the Clearspring Energy Advisors, Economic Benchmarking Study of Hydro Ottawa’s Total Cost and Reliability, Appendix A - Alternative Results Excluding Large Projects:

- a. [p.25] Please provide Figure 4 in tabular format.
- b. Please provide the specific costs that were removed for the Facilities Renewal Program and South Nepean Municipal Transformer Station.
- c. [p.24, Ex.9-1-3, p.9] For the Facilities Renewal Project, did Clearspring use the \$66M approved to be included in rates, or the actual cost of \$99.5M, in which the difference was recorded in a variance account? If it is not the entire actual amount, please revise the benchmarking results to include the full cost.

1-SEC-16

[Ex.1-1-1, Attachment A] With respect to the Clearspring Energy Advisors, Economic Benchmarking Study of Hydro Ottawa’s Total Cost and Reliability, Appendix A - Alternative Results Excluding Large Projects:

- a. Clearspring states that it was asked by Hydro Ottawa to determine the “total cost benchmarking results would change if the “once in a generation” Facilities Renewal Program and the South Nepean Municipal Transformer Station projects had not been pursued.” Did Clearspring make any other adjustments besides removal of capital costs

related to the two large projects to reflect a scenario in which the projects did not go forward. For example, increase facilities maintenance costs or other OM&A costs?

- b. Please confirm that in undertaking this analysis, Clearspring did not remove from the data of the peer group utilities the cost of similar projects they undertook. If not confirmed, please explain how it made such similar adjustments.
- c. Please confirm that Clearspring's understanding is that one of the purposes of the South Nepean Municipal Transformer Station is to "accommodate customer load growth and increase supply capacity in the South Nepean area of Ottawa".
- d. Please confirm that while it removed the costs of the South Nepean Municipal Transformer Station in conducting this analysis, it did not make any adjustments to the customer and load related output variables to account for demand that is now able to be served due to the South Nepean Municipal Transformer Station.
- e. If (d) is confirmed, directionally, what impact would it have had on the benchmark results if Clearspring had made such an adjustment?

1-SEC-17

[Ex.1-1-1, Attachment A] Please confirm that Clearspring was asked to provide this alternative scenario by Hydro Ottawa, it is not itself recommending that the benchmarking results of this alternative scenario be the basis for the Hydro Ottawa stretch factor.

1-SEC-18

[Ex.1-1-12, Attachment, p.33, Ex.1-1-10, p.25] Based on the results of its total cost benchmarking analysis, Clearspring recommends that Hydro Ottawa's stretch factor be at 0.3%. Hydro Ottawa is proposing to apply a stretch factor to only its OM&A costs. Please revise the benchmarking analysis to create a separate benchmark of Hydro Ottawa's capital and OM&A costs.

1-SEC-19

[Ex.1-1-1, Attachment B] With respect to the UMS, Hydro Ottawa Unit Cost Benchmarking Study:

- a. Please provide a copy of the retainer and any other instructions provided to UMS.
- b. [p.9] UMS notes that "the six asset categories represent almost 72 percent of the system renewal capital budget over the 2016 through 2018 period" and "Hydro Ottawa spends approximately 48 percent of all preventative and predictive maintenance costs on the OM&A programs / practices that comprise this study, with the exception of meter maintenance, which is a reactive program." Please provide these calculations.
- c. [p.12] Please explain how the various asset categories and OM&A programs/practices were selected. Please provide a list of others that were considered, and reasons for why they were not selected.
- d. Please detail all methodological differences in this study as compared to the UMS study filed in Toronto Hydro's 2020-2024 application (EB-2018-0165, Ex.1B-2-1, App B).
- e. Please explain the difference in the peer group selected for this study and that filed in the Toronto Hydro's 2020-2024 application (EB-2018-0165, Ex.1B-2-1, App B).

- f. Please provide a copy of the underlying excel spreadsheet(s) used to produce the results of the study, with all formulas intact.
- g. [p.27] Please provide a copy of the results that include the following ‘normalization’ adjustments only: a) measurement conversion, b) current conversion, and c) indirect/overhead accounting practices adjustments.
- h. [p.40] Please provide a copy of Hydro Ottawa’s response to Appendix F.

1-SEC-20

[Ex.1-1-1, Attachment B, p.9] On a similar basis as provided on p.9 of the UMS study, for each year between 2020 and 2026:

- a. Please provide the percentage of system renewal capital spending represented by the six asset categories benchmarked.
- b. Percentage of preventative and predictive maintenance costs represented by the programs/practices benchmarked.

In your response, please provide the underlying calculations.

1-SEC-21

[Ex.1-1-1, Attachment B] For each asset category and OM&A program/practice included in the UMS Study, please provide the total annual amount spent or forecast to be spent on each, for each year between 2016 and 2025.

1-SEC-22

[Ex.1-1-1, Attachment B, p.40] On the same basis as the information required in Appendix F, ‘Unit Cost Tab’, please provide Hydro Ottawa’s actual information for 2019, and the forecast information for each year between 2020 and 2025.

1-SEC-23

[Ex.1-1-1, Attachment B] With respect to the Gartner, Hydro Ottawa IT Budget Assessment Benchmark Report:

- a. Please provide a copy of the retainer and any other instructions provided to Gartner.
- b. Please confirm that for both ‘IT Budget % of Revenue’ and ‘IT Budget % of ‘Operating Expenses’ metrics, Revenue and Operating Expenses includes cost of power. If confirmed, please revise the metrics to exclude cost of power costs.
- c. [p.8] Please provide a list of the peer group companies.
- d. [p.8] Of the 9 peer group utilities, how many are similarly distribution only utilities?
- e. [p.27] Please provide a copy of Hydro Ottawa’s IT Budget Assessment Model data.
- f. Please reference and reconcile the IT spending data with historic IT spending information contained in the application.

1-SEC-24

[Ex.1-1-1, Attachment G] With respect to the Mercer, 2019 Market Benchmarking Study:

- a. Please provide a copy of the retainer and any other instructions provided to Mercer.

- b. For each position benchmarked, please provide the number of Hydro Ottawa employees who hold that position.
- c. Please provide a table that shows each element of compensation that can be paid to Hydro Ottawa employees, and what elements are included in the survey and what elements are not.
- d. What time period is the Hydro Ottawa data based on?
- e. [p.3] For each of the survey sources, please provide the peer group of companies/entities. (If Mercer is unable or does not know the peer group of companies/entities, please provide as much information as it has available to it(i.e. number of companies/entities, sectors, public and/or private sector, etc.).
- f. [p.10] Please confirm that Mercer did not benchmark pension and employee benefit costs to the peer group companies and entities and the comparison made was to the Ontario public sector.

1-SEC-25

[Ex.1-1-13] Please provide details of all productivity and efficiency measures Hydro Ottawa has taken since its last rebasing application in 2016. Please quantify the savings.

1-SEC-26

[Ex.1-1-9, p.32; Ex.1-1-13] For each listed productivity and efficiency measure Hydro Ottawa plans to undertake between 2021 and 2025, please quantify the forecast savings per year, and detail how the savings were calculated.

1-SEC-27

[Ex.1-2-2, p.5] Please explain what specific changes, if any, were made to the proposed capital plan and/or application after the Phase II customer consultation.

1-SEC-28

[Ex.1-1-13, Attach A] With respect to the Corporate Productivity Scorecard, please provide 2019 actuals and 2020 targets.

1-SEC-29

[EB-2015-0004, Ex.D-1-4, Attach] Please provide a revised version of the ‘Balanced Productivity Metrics’ scorecard included as part of Hydro Ottawa’s 2016-2020 application with additional data for 2014-2019 actuals, and 2020-2025 forecast data.

1-SEC-30

[Ex.2-1-1, Attach A] With respect to the New Administration and Operations Facilities:

- a. [p.21] How many FTEs work in or are based out of, in each of: a) EC-1, b) EC-2/3, c) SC-1
- b. [p.3] Please provide a high-level summary, including total bid cost, for each of the 4 bids received for the design build contract.
- c. [p.3] Please provide details regarding the scope and type of the design build contract (i.e. what work was covered under the contract, was the contract a fixed-price, etc.)?

- d. [p.18] Please provide further details regarding the Bank Street facility. What is the purpose of the facility, its size, and its potential sale value and on-going costs.
- e. [p.40] SEC seeks to understand the differences in the various sub-components, as opposed to total cost, included in the estimates between the Quantity Survey Report and the final actual costs. Please provide a table showing a breakdown of the estimates in the Quantity Survey Report, and on the same basis, the final actual costs. Please explain any material differences in each category/sub-component.
- f. [p.40] What percentage of the total final contract was made up of costs under the design build contract? How does that compare with the estimated costs?

1-SEC-31

[Ex. 1] Please provide summaries of all internal audit reports conducted since 2016, their findings, recommendations, and the status of any corrective action taken or planned to be taken.

1-SEC-32

[Ex-2015-0004, Hydro Ottawa Response to CCC IR #41] Hydro Ottawa stated: “Currently Hydro Ottawa is working to develop Performance Matrices that will improve and enhance benchmarking, business plan development and accomplishment reporting processes by tracking effectiveness and efficiency of the investments made. The project will be completed in 2015. This will allow 2016 data to create a baseline to be compared to that of 2017 and on.” Please provide a copy of the reference matrices that were developed in 2015, the 2016 baseline data, and comparison data for 2017 to 2019.

1-SEC-33

[Ex.1-2-1] On July 11, 2019, Hydro Ottawa held a meeting with customer group stakeholders and OEB Staff, in part, to receive feedback related to its customer engagement plans. Please provide details regarding what changes to its customer engagement plans were made as a result of the feedback obtained from participants of that meeting.

2-SEC-34

[Ex.2-4-3] Please update the following tables and figures to include 2019 actuals:

- a. Reliability Tables: 4.4, 4.5, 4.6, 4.23 (*Note: Please also provide the updated version of Table 4.23 in excel*)
- b. Reliability Figures: 4.1, 4.2, 4.3
- c. Productivity Tables: 4.9, 4.10
- d. Asset Performance Tables: 4.11, 4.13
- e. Unit Cost Tables: 4.22

2-SEC-35

[Ex. 2-4-3] For each year between 2016 and 2025, please provide the total value of capital work completed by external contractors.

2-SEC-36

[EB-2016-0004, Ex. B, Attachment 1(A). In Hydro Ottawa’s 2016-2020 Custom IR application it filed as part of its DSP information for each of its material capital programs for 2016. Please provide a table that shows for each project, a) the forecast cost of the project included in that

application, b) the actual cost of the project, c) forecast in-service date of the project include in that application, d) actual in-service date, e) and variance explanation for costs above +/-10%, and delays of greater than 6 months.

2-SEC-37

Please provide a similar table as requested in 2-SEC-36 that reflects material capital projects for each year between 2017 and 2019, but, use internal cost and schedule forecasts as the information does not appear to have been provided in the 2016-2020 Custom IR Application. In your response, please explain the basis of the internal cost/schedule forecast (i.e. at what point in the planning process is it based on etc).

2-SEC-38

[Ex.2-4-3, p.97-99] With respect to the ACA framework:

- a. Please provide the mathematical formulation used to create the asset, Health Index.
- b. Please explain what data inputs are considered and how they are used in the formula.
- c. Please describe any changes made to the ACA framework since its last application.
- d. Does Hydro Ottawa track data availability in the database used to develop asset Health Indices? If so, please provide the data availability score (or similar metric).
- e. With respect to the asset specific Health Index information provided in the evidence, what was the date the information is reflective of?

2-SEC-39

[Ex.2-4-3, p.121-122] Please explain how Hydro Ottawa has determined the cost of customer interruption. Please provide copies of any studies or analyses that were considered in the determination.

2-SEC-40

[Ex.2-4-3] Please explain how the Hydro Ottawa capital planning process in this application differs from that set out in its last application.

2-SEC-41

[Ex.2-4-3, p.121-129] Please provide a copy of any internal guide(s) used for capital planning.

2-SEC-42

[Ex.2-4-3, p.129] Please provide a copy of each of the: a) 'Preliminary Project List', b) 'Detailed Project List', and c) any final project list. Please ensure the lists include all of the value measure calculations.

2-SEC-43

[Ex.2-4-3, p.129] Please explain how Hydro Ottawa re-assesses and re-prioritizes projects on an annual basis.

2-SEC-44

[Ex.2-4-3, p.137] Please confirm that Figures 6.1 and 6.2 shows the overall percentage of assets in each age demographic/asset condition as a percentage of number of assets.

2-SEC-45

[Ex.2-4-3, p.136-255] Please complete the attached excel spreadsheet.

2-SEC-46

[Ex.2-4-3, p.272] Please explain what is the cause of the significant increase in the 'Functional Obsolesces' spending driver category.

2-SEC-47

[2-4-3, p.313] Is the Metering Renewal program an entirely new set of activities or just collected under a new program? If it is just a new program, please explain what previous capital programs from the 2016-2020 Custom IR application were the activities previously a part of.

2-SEC-48

[Ex.2-4-3] Please update the following Tables 8.2 and 8.4 to include 2019 actuals.

2-SEC-49

[Ex.2-4-3, Attach A] Please provide a version of Appendix 2-AA on an in-service additions basis.

2-SEC-50

[Ex.2-4-3, p.335] Please explain why Hydro Ottawa classifies capital contribution payments to Hydro One as General Plant expenditures.

2-SEC-51

[Ex.2] Please provide step-by-step details regarding how Hydro Ottawa forecasts individual project costs. Please provide examples to illustrate.

2-SEC-52

[Ex.2] Please provide step-by-step details regarding how Hydro Ottawa forecasts individual programs costs. Please provide examples to illustrate.

2-SEC-53

[Ex.2] Please explain how Hydro Ottawa translates the annual capital expenditures into in-service additions.

2-SEC-54

[Ex.2-4-3, Attachment D] With respect to the Navigant, Independent Assessment of Hydro Ottawa's Distribution System Plan:

- a. Please provide a copy of the retainer and any other instructions provided to Navigant.
- b. Please provide the CV of Mr. Shaltz, and include a list (including docket numbers) for all other expert testimony he has provided to courts or regulators related to utility capital planning or related engagements.
- c. Please provide a copy of all recommendations provided to Hydro Ottawa.
- d. Please confirm that the only Hydro Ottawa information that Navigant based its assessment on are draft versions of the three documents listed on page 1. If this is not confirmed, please provide details and copies of all documents/interview notes/data, etc. that Navigant reviewed, if not already contained in the application.

2-SEC-55

[Ex.2-4-3, Attachment G] With respect to the METSCO Review of the Hydro Ottawa's Asset Condition Assessment Framework:

- a. Please provide a copy of the retainer and any other instructions provided to METSCO.
- b. Please provide a list of all information/documents/individuals that METSCO reviewed in its review.
- c. [p.2] METSCO states: "In this regard, Hydro Ottawa has implemented a number of enhancements to the ACA framework since METSCO's initial assessment was performed".
 - i. Please provide a copy of METSCO's initial assessment.
 - ii. Please detail what "enhancements" Hydro Ottawa made.
- d. [p.4] Please provide METSCO's assessment of Hydro Ottawa's ACA framework relative to other large utilities that it has familiarity with.
- e. Please provide METSCO's views on what enhancements and improvements Hydro Ottawa should focus on to improve its ACA framework.

2-SEC-56

[Ex.2-4-3, Attachment J] With respect to the EA Technology ISO 55000 Gap Analysis:

- a. Please provide a copy of the retainer and any other instructions provided to METSCO.
- b. Please provide a copy of the CVs of the authors of the report.
- c. Please provide a table that includes: a) Each recommendation, b) Hydro Ottawa's response, and c) time-frame for implementation.

2-SEC-57

[Ex.2-4-6, p.9-10] Please update Tables 8 and 9 to include 2019 information. (Note: Please provide the response in excel format).

2-SEC-58

[Ex.2-4-3, Attachment G, p.8] Please provide a copy of the referenced documents:

- a. Hydro Ottawa – *Strategic Direction*
- b. Hydro Ottawa – IAS-0001 – *Asset Management Policy*
- c. Hydro Ottawa – *Asset Management Plans*
- d. Hydro Ottawa – *Project Evaluation Procedure*
- e. Hydro Ottawa – *Project Prioritization Procedure*

3-SEC-59

[Ex.3-1-1] Please detail all changes, if any, between Hydro Ottawa's proposed load forecast methodology and that filed in its 2015-2020 application.

3-SEC-60

[Ex.3-2-1] Please update Appendix 2-H to include 2019 actuals.

4-SEC-61

[Ex.4-1-1, p.4-5] Please provide details regarding the adjustments made by Hydro Ottawa's Executive Management Team. Please provide a copy of the budget that was provided to the Executive Management Team.

4-SEC-62

[Ex.4-1-4, p.40; Ex.2-4-3, p.327] Please explain how an increase or decrease in the cost of power impacts Hydro Ottawa's IT costs.

4-SEC-63

[Ex.4-1-5, Attachment A, p.3-4] With respect to incentive pay:

- a. [p.4, Table 1] Please update to include 2019 actual information.
- b. For eligible employees, what is the maximum amount of incentive based pay they are eligible to receive? If the amount differs based on employee level, please explain.
- c. For each year between 2016 and 2021, please provide the actual percentage of incentive-based pay received or forecast to be received (provided on the same basis as your response to part b).

4-SEC-64

[Ex.4-1-5, Attachment A, p.4] For the purposes of the forecast 2021 budget, what assumptions has Hydro Ottawa made with respect to the period (April 1, 2021-December 31, 2021) that is after the expiry of the current Hydro Ottawa-IBEW collective agreement?

4-SEC-65

[Ex.4-1-5, Attachment C] Please provide a revised version of Appendix 2-K that includes the following:

- a. 2019 actuals.
- b. Forecast 2022-2025 period (This is required as Hydro Ottawa is not proposing a formulaic adjustment to years 2-5 of the Custom IR term for compensation costs recovered through capital).
- c. A breakdown of Non-Management into two sub-categories, i) Union, and ii) Non-Union.
- d. 2 additional rows that identify total compensation amounts allocated to capital and OM&A.

4-SEC-66

[Ex.4-2-1, p.5] Please update Table 3 to show 2019 actuals.

5-SEC-67

[Ex.5-1-1, p.7, 10] Please provide an updated version of Tables 2 and 4 with the most recent available forecast information.

5-SEC-68

[Ex.5-1-1, p.10] Please provide a table that shows what the ROE forecast would have been for each year between 2015 and 2020 based on inputs from the December 2014 Consensus Forecast.

8-SEC-69

[Ex.8] Please provide a table that shows for each year between 2011 and 2025, and for each rate class, Hydro Ottawa's approved (2011-2020) and forecast (2021-2025) fixed and variable base distribution rate.

9-SEC-70

[Ex.9] Please provide Hydro Ottawa's views on appropriateness of the creation of an asymmetrical variance account, to capture the revenue requirement impact of any underspending on capital (on an in-service addition basis) as the Board has approved for other Custom IRs (See EB-2017-0049, EB-2018-0165, EB-2019-0082).

Respectfully submitted on behalf of the School Energy Coalition, this May 11, 2020.



Mark Rubenstein
Counsel for the School Energy
Coalition