

May 11, 2020

Christine Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street
P.O. Box 2319
Toronto, Ontario
M4P 1E4

Dear Ms Long:

EB-2019-0261 - Hydro Ottawa Limited – 2021-2015 Rates – Custom IR

Please find, attached, interrogatories on behalf of the Consumers Council of Canada for Hydro Ottawa Limited 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: Hydro Ottawa, Regulatory Affairs
Fred Cass, Aird & Berlis
All Parties

INTERROGATORIES FOR HYDRO OTTAWA LIMITED

FROM THE CONSUMERS COUNCIL OF CANADA

RE: 2021-2025 RATES

EB-2019-0261

CCC-1

Hydro Ottawa filed an update on May 5, 2020. Does Hydro Ottawa expect to file any further updates regarding its evidence? When does Hydro Ottawa expect to provide a detailed assessment of the impacts of the COVID-19 pandemic on Hydro Ottawa's Application?

CCC-2

(Ex. 1-1-5, p. 8)

Please file the Integrated Regional Resource Plan (IRRP) cited in the evidence. Hydro Ottawa has listed the required projects arising out of that plan. The evidence also states that "these investments will remain subject to change through the finalization of the IRRP and subsequent Regional Infrastructure Plan processes". To what extent are these projects subject to change? Please explain.

CCC-3

(Ex. 1-1-8, p. 3)

Please provide the 2019 Electricity Utility Scorecard.

CCC-4

(Ex. 1-1-8, p. 3)

Hydro Ottawa has pointed to productivity gains through cost containment and increased automation of business processes as a noteworthy performance outcome from 2016-2020. Please provide all documentation regarding the productivity gains achieved during the 2016-2020 period.

CCC-5

(Ex.1-1-8, p. 4)

Please provide all projections of productivity expected during the rate plan period referred to.

CCC-6

(Ex. 1-1-8, p. 3)

For each of the items listed as "performance outcomes" please provide the level of savings achieved. Please include all assumptions

CCC-7

(Ex. 1-1-8, p. 5)

Please provide copies of all materials presented to the Hydro Ottawa Board of Directors and the Holding Company Board of Directors related to this Application.

CCC-8

(Ex. 1-1-8, p. 14 and Ex. 1-1-12)

For each of the Benchmarking Studies listed:

- a) Please provide the Terms of Reference
- b) Please indicate if the study was subject to an RFP Process. If it was not please indicate why.
- c) Please provide the total cost of the study and indicate how those costs will be recovered.

CCC-9

(Ex. 1-1-8, p. 19 and Ex. 1-1-9, Attachment A)

The evidence states that during the internal budgeting process, the initial levels of OM&A submitted by the various Divisions within the utility resulted in a compound annual growth rate of 3.5% over the 2021-2025 period. In step with its commitment to continuous improvement and with customers preferences for minimizing rate increases, Hydro Ottawa then applied a customer OM&A escalation factor to contain upward pressure on operational expenses and to embed productivity expectations throughout the 2021-2025 period:

- a) Please provide a detailed timeline of the budgeting process;
- b) Please provide all direction (budget memos, guidelines, assumptions etc.) provided to employees regarding the 2021-2025 budgeting process beyond that set out in Attachment A (Ex. 1-1-9);
- c) Please provide the original OM&A budget referred to above.

CCC-10

(Ex. 1-1-8, p. 25)

Hydro Ottawa engaged Elenchus Research Associates to undertake a Cost Allocation Model study. Please file the terms of Reference for the Elenchus work. What is the expected cost of the consulting engagement?

CCC-11

(Ex. 1-1-9)

Please set out the detailed timeline for the preparation of the 2021-2025 Business Plan. Please describe, in detail, the process that was undertaken to develop the Business Plan. Please provide the Business Plan applicable to the 2016-2020 Application.

CCC-12

(Ex. 1-1-9, p. 5)

Please provide an organizational chart setting out all current employees and positions down to the Manager level. Please list all of the members of the Executive Management Team and their positions. Please provide a list of all members of the holding company and their positions.

CCC-13

(Ex. 1-1-9, p. 5)

Please provide the quarterly reports to the holding company and regulated distribution utility Boards for 2019 and Q1 2020.

CCC-14

(Ex. 1-1-9, p. 7)

Please provide the results of the annual customer satisfaction survey for the years 2016-2019

CCC-15

(Ex. 1-1-9, p. 9)

What was the total cost of the customer engagement activities that were undertaken from January-September 2019? How were those costs recovered or how will they be recovered?

CCC-16

(Ex. 1-1-9, p. 9-11)

In carrying out its targeted customer outreach activities to inform the specific plans and proposals set forth in its 2021-2025 rate application, were customers ever informed that included in rates is an allowed Return on Equity? If so, please describe what customers were told with respect to the ROE. If not, why were they not?

CCC-17

(Ex. 1-1-9, p. 16)

The Business Plan states that, "The footprint and dispersion of distribution utilities throughout Eastern Ontario means that Hydro Ottawa remains well-positioned to pursue consolidation opportunities." Does Hydro Ottawa currently have plans to acquire or merge with other LDCs? Please explain how the pursuit of consolidation opportunities is funded? Is this done within the LDC or the holding company? Has Hydro Ottawa included in its budgets amounts related to consolidation? If so, please set out those amounts.

CCC-18

(Ex 1-1-9, p. 29)

In the Business Plan it states, "In the last year of publicly available data collected by the OEB, Hydro Ottawa's total operating cost per customer was \$260. Consistent with the pattern of recent years, this compared favourably to the average cost per customer across all electricity distributors in the province (\$316)." What is the cost

per customer for 2021 calculated on the same basis as the \$260? What is the cost per customer for 2019 and 2020?

CCC-19

(Ex. 1-1-9, p. 30)

In the Business Plan it states that, "Certain proposals for capital spending have been deferred, as part of an asset needs rationalization process which was undertaken in order to prioritize the most critical projects for system reliability and maintenance and to identify opportunities for minimizing rate impacts". Please identify all of the proposals for capital spending that have been deferred, and when they are expected to be undertaken?

CCC-20

(Ex. 1-1-9, pp. 31-32)

For each of the productivity initiatives that were identified in the Business Plan please provide the level of net savings achieved.

CCC-21

(Ex. 1-1-9, pp. 32-33)

For each of the productivity initiatives identified in the Business Plan for the 2021-2025 period, please provide the forecast net savings.

CCC-22

(Ex. 1-1-9, p. 38)

Residential distribution rates, as proposed are expected to increase by an average of 4.44% each year of the rate plan period. In its customer engagement activities, were the distribution rate impacts as set out in Table 7 of the Business Plan provided to customers? If not, why were they not?

CCC-23

(Ex. 1-1-10, pp. 13-14)

Hydro Ottawa is proposing to use an inflation factor that is derived from a different weighting of the two sub-indices relative to the OEB inflation factor calculation. If Hydro Ottawa used the OEB approach how would this impact the 2022 revenue requirement calculation?

CCC-24

(Ex. 1-1-10)

Is Hydro Ottawa of the view that its Custom IR proposals are consistent with the OEB policies set out in its Rate Handbook?

CCC-25

(Ex. 1-1-10)

Please provide a complete list setting out all of the ways Hydro Ottawa's rate proposals in this Application differ from the rate proposals agreed to in EB-2015-0004

CCC-26

(Ex. 1-1-8, p. 27 and Ex. 1-1-10, p. 26)

Did Hydro Ottawa consider an ESM that has no deadband, sharing all overearnings with its customers? If not why did it not? Was the ESM proposal informed by Hydro Ottawa's customer engagement activities? If so, please explain how? If not, why was it not? Why has Hydro Ottawa changed the ESM relative to what was approved for the previous rate plan period?

CCC-27

(Ex. 1-1-8, p. 27 and Ex. 1-1-10, p. 27)

Hydro Ottawa has indicated its intent to reserve its right over the course of the rate plan term to apply for Z-factor relief. Does Hydro Ottawa agree that Z-factors are meant for both costs incurred and costs saved/revenue generated resulting from unforeseen events, decisions or activities the results of which cannot be reasonably anticipated or quantified? What is Hydro Ottawa's materiality threshold?

CCC-28

(Ex. 1-1-10, p. 36)

Please provide a copy of the 2016-2020 DSP.

CCC-29

(Ex. 1-1-13)

Hydro Ottawa has provided in Schedule 13 a detailed report entitled, "Productivity Improvement Initiatives". For each of the prospective initiatives has Hydro Ottawa provided business cases? If so, please provide those business cases. Has Hydro Ottawa undertaken analyses to assess the net savings associated with each of these initiatives? If so, please provide those analyses.

CCC-30

(Ex. 1-1-13, pp. 5-8)

Please describe, in detail, Hydro Ottawa's online billing policy.

CCC-31

(Ex. 1-1-13, p. 51)

Hydro Ottawa intends to embark on a "service automation journey" utilizing a digital platform, Salesforce. What is the cost of this initiative, both OM&A and Capital? Please provide a dollar value for each of the productivity gains listed in the evidence related to this initiative.

CCC-32

(Ex. 1-2-1, Attachment B, p. 15)

The evidence states, Hydro Ottawa intends to remain a trusted advisor to its customers in the emerging smart energy future through its Conservation and Demand Management Team. This future includes a growing array of electricity generation alternatives, electricity storage, demand management and Smart Grid technologies. Are these activities funded through rates or an affiliate? If they are funded through rates please provide a detailed budget for each of these activities for each year in the rate plan period. Is CDM funding in within the LDC currently allowed by the OEB?

CCC-33

(Ex. 1-2-2)

What is the total cost of Hydro Ottawa's engagement of Innovative Research Group? Please provide the Terms of Reference for this work. Was this work subject to an RFP process? If not, why was it not?

CCC-34

(Ex. 1-3-1)

Please provide the Audited Financial Statements for 2019.

CCC-35

(Ex. 2-1-1 Updated)

Please provide Hydro Ottawa's depreciation expense, forecast compared to actuals, for each of the years 2016 to 2020.

CCC-36

(Ex. 2-4-3, p. 1 and p. 266)

p. 1 Hydro Ottawa indicates it is on track to successfully complete its plan for 2016-2020, with adjustments for typical changes and evolving circumstances.

p. 266 Through the course of the 2016-2020 period, Hydro Ottawa has reprioritized projects and adjusted program pacing as necessary.

- a) Please provide the original number of projects forecast to be completed for the years 2016-2020 compared to the actual number of projects completed.
- b) Please provide the percentage of original projects completed.
- c) Please provide the actual dollar value of the original projects completed compared to budget.

CCC-37

(Ex. 2-4-3, p. 29)

Large segments of the system were constructed in the 1960s, 1970s, and 1980s, with a typical expected service life for these assets in the order of 50 years. Consequently, a considerable proportion of the system has exceeded or is

approaching its anticipated end of life. These aging assets pose an increasing failure potential, and without corrective actions, will impact the utility's ability to maintain system reliability and minimize unplanned renewal cost in the future.

- a) Please define typical expected service life.
- b) Please define anticipated end of life.
- c) Please define useful life.
- d) Please explain how Hydro Ottawa applies these concepts to determine spending forecasts in the current application.

CCC-38

(Ex. 2-4-3, p. 54, 56, 58, Tables 4.4, 4.5 and 4.6)

Please update Tables 4.4, 4.5 and 4.6 to include 2019 data.

CCC-39

(Ex. 2-4-3, p. 66-67)

Hydro Ottawa plans to track asset performance using a Defective Equipment Contribution to SAIFI metric. Each asset class contributes to the overall SAIFI reliability metric. The metric allows Hydro Ottawa to identify assets that cause multiple outages and better focus its attention on issues directly affecting customers. Table 4.11 shows how each asset class (overhead, station and underground) contributes to the overall SAIFI reliability metric.

- a) Please update Table 4.11 to include 2019 data.
- b) Please explain how the Target column was derived and show any calculations.
- c) When was this metric first implemented?
- d) Please identify the top five asset types that cause the most multiple outages in order of impact.
- e) Please provide the underlying data in excel by asset type (i.e. overhead switch, underground switchgear, underground cable (PILC), underground cable (polymer) etc.) that makes up the data in Table 4.11 including 2019.

CCC-40

(Ex. 2-4-3, p. 79, Table 4.23)

Table 4.23 captures the historical outage information by primary cause.

- a) Please update Table 4.23 to include 2019 data.
- b) Does the data in Table 4.23 include Major Event Day (MED) data. If yes, please extract and include MED data as a separate Primary Cause.
- c) Please provide an excel version of Table 4.23 updated to reflect (a) and (b).
- d) Please provide a further breakdown of the data under Defective Equipment, by equipment cause, in two ways: including and excluding MED data and provide the excel version of the data.
- e) Please explain how the number of customer interruptions or customer-hours impact Hydro Ottawa's classification of the severity rating of the outage?

CCC-41

(Ex. 2-4-3)

Please provide the total number of outages by year for each of the years 2016 to 2019.

CCC-42

(Ex. 2-4-3, p. 91)

Hydro Ottawa indicates Defective Equipment Contribution trends are reviewed on an annual basis to establish a target for the frequency and the quantity of assets to be replaced.

- a) Please provide the targets and how they were derived for the years 2016 to 2020.
- b) Please provide the quantity (total number of assets replaced) forecast vs. actual for each of the years 2016 to 2019.
- c) Please provide the percentage of total assets replaced each of the years 2016 to 2019 and show the calculation.

CCC-43

(Ex. 2-4-3, p. 129)

Projects classified under the Pole Renewal and Underground Cable Renewal programs are optimized independently from all other projects. This is done to meet the replacement levels recommended by the Asset Management Plan for each asset type.

- a) Please provide more details as to why the Pole Renewal and Underground Cable Renewal programs are optimized independently from all other projects.

- b) Has Hydro Ottawa done a comparison with a scenario where Pole Renewal and Underground Cable Renewal programs are optimized with all other projects? If yes, please provide the results.

CCC-44

(Ex. 2-4-3, p. 129)

Please complete the following Table.

	# Projects	Budget \$	Date Completed	Constraints Applied
Preliminary Project List				
Detailed Project List				
Approved Project List				

CCC-45

(Ex. 2-4-3, p. 136)

Hydro Ottawa indicates 19% of all assets have reached their expected service life and now pose a higher risk of failure. An additional 12% of assets are within 10 years of reaching their expected service life.

- a) Please confirm 19% of all assets is based on the quantity of assets. If not, please explain.
- b) Please confirm the total number of assets used in the analysis.
- c) Please provide the percentage of all assets that reached their expected service life and the percentage of assets within 10 years of reaching their expected service life at the time of Hydro Ottawa's last CIR application (EB-2015-0004).

CCC-46

(Ex. 2-4-3, p. 136, Figure 6.1)

Figure 6.1 provides Overall Asset Age Demographics.

Please provide a version of Figure 6.1 at the time of Hydro Ottawa's last application EB-2015-0004 and confirm the vintage of the information.

CCC-47

(Ex. 2-4-3, p. 138, Figure 6.2)

Hydro Ottawa indicates 17% of assets are in Poor or Very Poor condition and overall asset condition ratings are summarized in Figure 6.2.

- a) Please confirm the vintage of the data in Figure 6.2 is December 2018.
- b) Please identify the party that undertook the Asset Condition Assessment (ACA) analysis and identify the ACA methodology used.
- c) Please provide a version of Figure 6.2 that reflects the same information (% of assets in very poor, poor, fair, good and very good condition) at the time of Hydro Ottawa's last application EB-2015-0004 and confirm the vintage of the information.
- d) Please provide a summary from 2010 onwards of when Hydro Ottawa has conducted an ACA and include the party that undertook the assessment, the methodology followed and the percentage of assets in very poor, poor, fair, good and very good condition at each assessment.

CCC-48

(Ex. 2-4-3, p. 138-193)

Hydro Ottawa provides Condition Demographics for its assets.

- a) Please complete the attached excel spreadsheet (CCC_IR_48).
- b) Has Hydro Ottawa undertaken a gap analysis that looks for any additional condition testing information that is currently being undertaken in the industry that Hydro Ottawa is not doing, that could be undertaken by Hydro Ottawa to improve the accuracy of its condition assessment results? If yes, please explain.

CCC-49

(Ex. 2-4-2, p. 194)

Assets identified of needing corrective action are evaluated to determine the appropriate action. Options evaluated are Repair, Refurbish or Replace. Please provide the number of Corrective Maintenance requests related to each of Repair, Refurbish or Replace for each of the years 2015 to 2019 and discuss any trends over time.

CCC-50

(Ex. 2-4-3, p. 195, Table 6.13)

Has Hydro Ottawa revised any of its Maintenance activities or cycles since EB-2015-0004? If yes, please provide details.

CCC-51

(Ex. 2-4-2 p. 274, Figure 8.3)

Figure 8.3 provides the Contribution to Total Forecast Expenditures by Drivers for the years 2021 to 2025:

- a) Please explain what falls under System Capital Investment Support (14%);
- b) Please provide the same Figure for the years 2016 to 2020.

CCC-52

(Ex. 2-4-3, p. 314, Table 8.22)

- a) Please provide a version of Table 8.22 with the years 2016 to 2020 added to the Table.
- b) Please provide an excel version of the Table.

CCC-53

(Ex. 2-4-3)

Please complete the attached excel spreadsheet (CCC_IR_53) to provide Hydro Ottawa's Planned and Unplanned Asset Replacement Rates.

CCC-54

(Ex. 2-4-3)

Please complete the attached excel spreadsheet (CCC_IR_54) to provide Hydro Ottawa's Asset Failure Rates by Asset Type.

CCC-55

(Ex. 2-4-3, Attachment E, p. 168)

Hydro Ottawa's Corrective Renewal Program consists of three Budget Programs: Emergency Renewal, Critical Renewal, and Damage to Plant. With respect to Damage to Plant, Hydro Ottawa provides the number of units for each of the years 2016 to 2025 at Table 1.83 and the Historical Damage to Plant Contribution by Asset Type in Figure 1.83.

- a) Please provide the same data for Emergency Renewal and Critical Renewal.
- b) Please provide the same data for Plant Failure for the years 2015 to 2017.

CCC-56

(Ex. 2-4-3, Attachment M)

- a) Please provide the terms of Reference for the Metsco's Review of Hydro Ottawa's Asset Condition Assessment Framework.
- b) When was Metsco first requested by Hydro Ottawa to review their asset condition assessment (ACA) framework?
- c) Please provide the final schedule of when the scope of work was completed.
- d) Please provide the date of the Metsco Review letter Attachment M.

e) Was this work subject to an RFP process?

CCC-57

(Ex. 2-4-3, Attachment M)

Metsco's review indicates Hydro Ottawa is constantly striving for continuous improvements, and in this regard, they continue to enhance and evolve their ACA framework and associated business processes. This includes efforts to transition from manual to automated procedures with respect to ingesting input data, including inspection, testing and monitoring data, in order to process health index results in a turn-key manner, and with an eventual goal to store this data into enterprise systems, such that the results can be better integrated into other planning procedures. Hydro Ottawa has established an implementation roadmap in order to achieve a desired end-state such that ACA results are available in a common, auditable, accessible and convertible format.

- a) In terms of completeness, what score out of 100% would Metsco give Hydro Ottawa with respect to this goal and implementation of the roadmap.
- b) In terms of maturity of Hydro Ottawa's ACA framework, how would Metsco describe Hydro Ottawa?

CCC-58

(Ex. 2-4-3, Attachment M, p. 1)

Metsco reviewed Hydro Ottawa's Overarching Processes, Systems & Associated Input Data. Hydro Ottawa currently uses Microsoft Excel to store the associated input data and perform the necessary calculations to produce the desired HI results.

- a) Did Metsco undertake a detailed review of Hydro Ottawa's input data? Please explain.
- b) Does Metsco have any concerns or recommendations regarding data quality with respect to completeness, accuracy, consistency, and availability?
- c) Did Metsco undertake a detailed review of Hydro Ottawa's Microsoft Excel process? Please explain.
- d) Does Metsco have any concerns or recommendations regarding the manual excel process, calculations, results and how they are currently integrated into the planning process and used to derive capital budgets?

CCC-59

(Ex. 2-4-3, Attachment M, p. 2)

Metsco reviewed the asset-class HI formulations, including the produced results and sample sizes.

- a) Does Metsco have any concerns or recommendations regarding current asset-class HI formulations and results for any specific asset class?
- b) Does Metsco have any concerns or recommendations regarding asset sample sizes?
- c) Does Metsco have any concerns or recommendations regarding the current ACA output?

CCC-60

(Ex. 2-4-3, Attachment M, p. 2)

Hydro Ottawa has implemented a number of enhancements to the ACA framework since METSCO's initial assessment was performed. When was Metsco's initial assessment performed? Please provide the initial assessment document.

CCC-61

(Ex. 2-4-3, Attachment M, p. 3)

Metsco indicates Hydro Ottawa is also leveraging an industry-derived function that allows for the conversion of the health index into an effective probability of failure value.

Please identify and provide details on this industry-derived function.

CCC-62

(Ex. 2-4-3, Attachment M, p. 1)

Metsco undertook the work in three stages: a) review of the overarching processes, systems and associated input data that are supporting the ACA framework, (b) review of the asset-class HI formulations, including the produced results and sample sizes, and (c) review of the end-state applications produced by the ACA framework, including how the HI results are ultimately integrated into broader AM deliverables.

Did Metsco undertake a gap analysis as part of its review? If yes, please provide the results.

CCC-63

(Ex. 2-4-6, p. 5)

Please update Table 5 to include 2019 data.

CCC-64

(Ex. 2-4-6, p. 9-10)

Please update Tables 8 and 9 to include 2019 data.

CCC-65

(Ex. 4-1-1, p. 3 and 7)

Please provide the Board Approved OM&A Expenses for the years 2016-2020 in the same format as Table 2

CCC-66

(Ex. 4-1-4, P. 18)

Please re-cast Table 10 to include Board approved OM&A Program Costs for the years 2016-2020.

CCC-67

(Ex. 4-1-4, p. 18)

Please provide a detailed budget for each of the following OM&A categories for the years 2016-2021. Please include all assumptions:

- a) Collections, Accounts and Activities
- b) Corporate Costs
- c) Customer and Community Relations
- d) Customer Billing
- e) Distribution Operations
- f) Regulatory Affairs

CCC-68

(Ex. 4-1-5, p. 5)

Please explain, in detail why Hydro Ottawa's compensation costs area increasing by more than \$10 million from 2016 to 2021. Of the \$77.6 million of total compensation costs for 2021, how much is related to compensation that is the tied to collective agreements?

CCC-69

(Ex. 4-2-1, p. 2)

The evidence states that the shared services pricing model and methodology were developed internally and the services are provided under the terms of Service level Agreements. Has Hydro Ottawa ever had the models and methodology reviewed by independent external consultants? If not, why has it not? If so, please provide any reports regarding these reviews. In the absence of a third-party independent review how can ratepayers be assured the allocations and pricing are fair?

CCC-70

(Ex. 4-2-1)

With respect to shared services, please explain in detail, the process used to record time spent and the number and/or value of transactions processed. Please provide an example of the time sheets. Please provide any directives provided to employees regarding shared services.

CCC-71

(Ex. 4-2-1, p. 6)

The Holding Company is providing services to Hydro Ottawa in 2021 for an annual cost of \$3.827 million. Please provide a detailed budget setting out all services provided to Hydro Ottawa and explain the nature of those services.

CCC-72

(Ex. 3-2-1, p. 1 and 9)

Please explain why the level of Specific Service Charges is decreasing in 2021 relative to historical levels. Please describe the methodology used to forecast Specific Service Charges. Is Hydro Ottawa seeking explicit OEB approval for its proposed Specific Service Charges, or simply approval of the forecasted revenue resulting from these charges?

CCC-73

(Ex. 3-2-1, p. 2)

Please provide a schedule setting out all current Specific Service Charges and the Specific Service Charges proposed for 2021. The evidence states that Hydro Ottawa undertook an internal costing review of many routine service charges to ensure that the associated costs of providing those services are appropriately recovered. Was a report prepared? If so, please provide a copy that report.

CCC-74

(Ex. 9-3-1, p. 4)

Does Hydro Ottawa intend to update its proposed rate riders for disposition of the deferral and variance account balances at any time? Please explain why the number of customers for each rate class differs in Table 3 and 4.

CCC-75

(Ex. 5-1-1, p. 8)

Please provide the approved and actual ROE for each year 2016-2019. Please provide the projected ROE for 2020.

CCC-76

(Ex. 5-1-1, p. 2)

Please explain why a short-term debt rate of 2.75% remains appropriate given the significant change in economic conditions that has occurred since the evidence was prepared.

CCC-77

(Ex. 9-1-3, pp. 12-13)

Please explain how the forecast amounts in the Gains and Losses on Disposal of Fixed Assets Variance Accounts were determined. How much of this is related to storms?

CCC-78

(Ex. 9-1-3, p. 14)

Please provide the ESM calculations for the years 2018 and 2019.

CCC-79

(Ex. 9-1-3, p. 5)

Hydro Ottawa is proposing a symmetrical variance account to record the revenue requirement impact related to overspending or underspending in the utility's capital plan in the System Access category. The rationale is that these expenditures are not within Hydro Ottawa's control as they can be volatile and difficult to predict:

- a) For the years 2016-2020, please provide the forecast and actual System Access costs;
- b) Does Hydro Ottawa agree that this account would effectively allow for these costs to be passed through to customers regardless of the amounts?;
- c) Does Hydro Ottawa agree that this would reduce the business risk of the utility?;
- d) Why is Hydro Ottawa treating 2025 differently with respect to this account?