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October 13, 2020

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

Dear Ms. Long,

**RE: EB-2020-000 Alectra Utilities 2021 Rates Proceeding
Energy Probe Interrogatories**

Attached are the interrogatories of Energy Probe in the EB-2020-0002 Alectra Utilities Inc. proceeding for OEB approval of its 2021 Rates.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.
Consultant representing Energy Probe

cc. Indy Butany-DeSouza (Alectra Utilities Corporation)
Charles Keizer (Torys LLP)
Patricia Adams (Energy Probe Research Foundation)
Jerry Wang (OEB Staff)

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ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c. 15, Schedule B, as amended (the “OEB Act”);

AND IN THE MATTER OF an Application by Alectra Utilities Inc. under section 78 of the OEB Act to the Ontario Energy Board for an Order or Orders approving or fixing just and reasonable rates and other service charges for the distribution of electricity as of January 1, 2021.

Application by Alectra Utilities Inc. for 2021 Rates

Energy Probe Interrogatories

October 13, 2020

Alectra Utilities Inc. 2021 Rates Application

Energy Probe Interrogatories

2-EP-1

References: Exhibit 2, Pages 1 to 4

- a) Please file a calculation of the Means Test for the Brampton RZ using the Brampton RZ financial information listing any assumptions that may be required to do the calculation.
- b) Please file a calculation of the Threshold Test for Alectra Utilities Inc. using the Alectra Utilities Inc. financial information listing any assumptions that may be required to do the calculation.

2-EP-2

Reference: Exhibit 2, page 6

Preamble: *“Request for financial settlement is anticipated from HONI in 2021 in the amount of \$5.7MM with the final amount and payment terms to be negotiated between HONI and Alectra at that time.”*

- a) Does Alectra have a document obtained from Hydro One that would support the calculation of the amount of \$5.7 million? If the answer is yes, please file the document. If the answer is no, please explain why not.
- b) Please explain how the \$5.7 million amount was determined listing all assumptions, calculations, and references to sources of data.

2-EP-3

References: Exhibit 2, Tab 1,

Please file a calculation of the Means Test for the PowerStream RZ using the Powerstream RZ financial information listing any assumptions that may be required to do the calculation.

4-EP-4

References: Exhibit 4, Attachment 3, Page 3

- a) Please confirm that the total length of the Goreway Drive Widening Countryside to Cottrelle relocation project is 7.1 km.
- b) What the total cost of relocation per km prior to contribution and after contribution?

4-EP-5

References: Exhibit 4, Attachment 3, Page 4, Table 1

- a) Please file a more detailed Project Scope Budget for the Goreway Drive Widening Countryside to Cottrelle relocation project that shows allocation of overheads and contingency. If there are any overhead costs charged to the project, please explain what they are and how they were estimated. If there is a contingency, please explain how it was calculated. If there is no contingency, please explain why not.
- b) Please file a detailed project schedule for the Goreway Drive Widening Countryside to Cottrelle relocation project.

4-EP-6

References: Exhibit 4, Attachment 3, Page 7

Preamble: *“Alectra Utilities forecasts that the ten-year economic evaluation of the Goreway TS expansion will result in a CCRA true-up payment of \$5.7MM to HONI in 2021.”*

Please file a copy of the ten-year economic evaluation forecast of the Gorway TS expansion including a list of all assumptions, calculations, and references to sources of data.

4-EP-7

Reference: Exhibit 4, Attachment 6, page 3

- a) Please confirm that the total length of the Rutherford Road Widening relocation project is the same as the 2.8 km road widening.
- b) What the total cost of relocation per km prior to contribution and after contribution?

4-EP-8

Reference: Exhibit 4, Attachment 6, Page 4

- c) Please file a more detailed Project Scope Budget for the Rutherford Road Widening relocation project that shows allocation of overheads and contingency. If there are any overhead costs charged to the project, please explain what they are and how they were estimated. If there is a contingency, please explain how it was calculated. If there is no contingency, please explain why not.
- d) Please file a detailed project schedule for the Rutherford Road Widening relocation project.