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October 13, 2020

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Our File No. 204701

**VIA RESS AND EMAIL**

Ontario Energy Board  
2300 Yonge Street  
27th Floor  
Toronto, Ontario  
M4P 1E4

Attention: Christine E. Long,  
Board Secretary

Dear Ms. Long:

**Re: EB-2020-0002: Alectra Utilities Corporation, 2021 Electricity Distribution Rates**

Pursuant to Procedural Order No. 1 dated September 25, 2020, please find attached BOMA's Interrogatories.

Yours truly,

**FOGLER, RUBINOFF LLP**

Albert M. Engel  
Certified Specialist in Environmental Law  
AME/dd  
Encl.  
CC: All Parties (*via email*)

**ONTARIO ENERGY BOARD**

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

**AND IN THE MATTER OF** an Application by Alectra Utilities  
Corporation 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.

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**INTERROGATORIES OF**  
**THE BUILDING OWNERS AND MANAGERS ASSOCIATION ("BOMA")**

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**October 13, 2020**

**Albert M. Engel**  
Partner  
Fogler, Rubinoff LLP  
77 King Street West, Suite 3000  
Toronto, ON M5K 1G8

**Counsel for BOMA**

**1-BOMA-1**

*Ref: Exhibit 1/Tab 1/Schedule 4/Page 3 of 4, Lines 11-12*

Preamble:

*Alectra Utilities has a Connection and Cost recovery Agreement (“CCRA”) payment due to Hydro One Networks Inc. (“HONI”) in the Brampton RZ in 2021. The payment relates to the Goreway Transformer Station (“TS”) ten-year true up payment. The payment is non-discretionary and is above the basis on which rates were set.*

Question(s):

- (a) Please explain why the payment is above the basis on which rates were set.

**1-BOMA-2**

*Ref: Exhibit 2/Tab 1/Schedule 1/Page 4 of 18/Lines 20 to 21*

Preamble:

*Alectra Utilities’ 2019 annual Reporting and Record Keeping Requirements (“RRRs”) were filed for Alectra Utilities, and not individually, by rate zone. Alectra Utilities 2019 ROE was calculated to be 7.21%, 174 basis points below a calculated ROE for Alectra of 8.95%.*

Question(s):

- (a) Please explain why Alectra Utilities' 2019 annual RRRs were filed for Alectra Utilities, and not individually, by rate zone; and
- (b) Please explain why the 2019 ROE was 174 basis points below the calculated ROE.

**1-BOMA-3**

*Ref: Exhibit 2/Tab 1/Schedule 1/Page 5 of 18/Lines 17 to 19*

Preamble:

*The CCRA true-up payment is a contractual obligation related to the CCRA between Alectra Utilities and HONI;*

- (a) When was the contractual obligation entered into?
- (b) Please provide a copy of the contract.

**1-BOMA-4**

*Ref: Exhibit 2/Tab 1/Schedule 1/Page 7 of 18*

Preamble:

The evidence states:

*No formal review between Alectra Utilities and HONI can be completed; and therefore, a review of any other options is not available at this time.*

- (a) Since the August 20, 2020 anniversary date has now passed, please review any other options that may be available.
- (b) Does Alectra have its own forecast of, or has it received from HONI a forecast of, revenues from the Goreway transformer expansion over a period beyond ten years?

# 1-BOMA-5

Ref: Exhibit 2/Tab 1/Schedule 1/Page 11 of 18/Table 8

Preamble:

Rate Class	Unit	kWh	kW	ICM Monthly Rate Rider (before HST)	% Increase vs 2020 Total Bill (before HST)
Residential	kWh	750		\$0.22	0.16%
General Service Less Than 50 kW	kWh	2,000		\$0.64	0.18%
General Service 50 To 699 kW	kW	182,500	500	\$14.58	0.05%
General Service 700 To 4,999 kW	kW	627,216	1,432	\$55.20	0.05%
Large Use	kW	10,220,000	20,000	\$514.35	0.03%
Unmetered Scattered Load	kWh	21,296		\$4.27	0.11%
Street Lighting	kW	2,787,508	7,922	\$861.14	0.15%
Embedded Distributor	kW	1,417,701	4,000	\$39.20	0.02%
Distributed Generation [Dgen]	kWh	156		\$0.98	0.73%

- Please describe what the column labelled "Unit" represents;
- Please explain why in the column labelled "Unit", the values include both kWh and kW;
- Please explain what the values in the column labelled "kWh" represent;
- Please explain what the values in the column labelled "kW" represent;
- Please explain what the values in the column labelled "ICM Monthly Rate Rider (before HST)" represent;
- Please explain what the values in the column labelled "% Increase vs 2020 Total Bill (before HST)" represent;

- (g) Please explain how the values in the column labelled "ICM Monthly Rate Rider (before HST)" relate to the values in the columns labelled "kWh", "kW" and "% Increase vs 2020 Total Bill (before HST)".

**1-BOMA-6**

*Ref: Exhibit 3/Tab 1/Schedule 11/Pages 2 to 4*

- (a) Please provide the Distribution bill impact for the Enersource and Guelph rate zones of the proposed rate increases for 2021 over 2020.
- (b) Does Alectra agree that it is not realistic to expect the Board's decision and final rate order in this case prior to January 1, 2021?

**1-BOMA-7**

*Ref: Exhibit 4/Tab 1/Schedule 1/Attachment 5*

- (a) Attachment 5 provides a list of the planned capital projects for the PowerStream and Brampton rate zones for 2021. Please provide comparable projects for the Horizon, Enersource, and Guelph rate zones.

**1-BOMA-8**

*Ref: General*

- (a) What is the forecast Alectra 2021 revenue requirement?