CANADIAN NIAGARA POWER INC.
A FORTIS ONTARIO Company

October 15, 2020

Ms. Christine E. Long
Registrar
Ontario Energy Board
2300 Yonge Street, 27th floor
Toronto, ON M4P 1E4

Dear Ms. Long:

Re: EB-2020-0008 Canadian Niagara Power Inc. 2021 IRM Application
Interrogatory Responses

In accordance with Procedural Order #1, please find attached CNPI's responses to interrogatories from OEB Staff ("Staff"), Vulnerable Energy Consumers Coalition ("VECC"), and the School Energy Coalition ("SEC").

Copies of the attached responses have also been provided to VECC and SEC representatives, as well as OEB Staff.

Please direct any questions or concerns to the undersigned.

Sincerely,

Greg Beharriell Digitally signed by Greg Beharriell
Date: 2020.10.15 08:44:34 -04'00'

Greg Beharriell, P.Eng.
Manager, Regulatory Affairs
Phone: 905.871.0330 Ext.3278
RegulatoryAffairs@FortisOntario.com

Encl.

cc: Mark Rubenstein, Jay Shepherd, Wayne McNally (SEC)
Shelley Grice, John Lawford (VECC)
Marc Abramovitz, Richard Lanni (OEB Staff)

Staff-1
Ref 1: Manager's Summary, Page 18

Please provide the following information:

a) Provide a copy of CNPI's Emergency Operations Plan.
b) Discuss any deviations from CNPI's Emergency Operations Plan.
c) Clarify whether CNPI paid any premium amounts to its third-party contractors.
d) Provide a separate schedule (breakdown) of each Third Party Contractor invoice based on labour, materials, accommodations, meals, truck, other (provide explanation).

RESPONSE:

a) Portions of CNPI's emergency plans relevant to storm/outage response and restoration are provided as Appendix Staff-1.

b) CNPI did not deviate from the emergency plans filed in response to part a).

c) CNPI paid overtime rates in accordance with the "Labour – OT" column of the table provided in response to part d), in accordance with its LDC Mutual Aid agreement and other third-party contracts. CNPI also paid a $250 charge for weekend delivery of material from a supplier (i.e. $250 of the $1,800 charge for Anixter was for weekend delivery).

d) Please refer to the following table:

Vendor	Invoice Total	Labour - Reg	Labour - OT	Mat'l	Vehicle /Equip	Meals	Other	Total
ANIXTER	1,800						1,800	1,800
GAMS – Inv#1	3,595	3,595						3,595
GAMS – Inv#2	147,940	55,252	92,688					147,940
KLINE	217,576	13,250	152,582		51,745			217,576
NIAGARA HELICOPTERS LTD	1,175						1,175	1,175
NIAGARA PENINSULA ENERGY	65,940	54,612		497	10,832			65,940
PETERS EXCAVATING – Inv#1	1,238	1,238						1,238
PETERS EXCAVATING – Inv#2	22,932	20,598	2,334					22,932
PINERIDGE TREE	21,600	4,000	17,600					21,600
WELLAND HYDRO	18,861		14,925		3,936			18,861
TOTAL	**502,656**	**152,543**	**280,129**	**497**	**66,512**	**0**	**2,975**	**502,656**

Explanation for "Other" charges:

i. $1,800 for Anixter was for a weekend delivery of material
ii. $1,175 for Niagara Helicopters was for an aerial patrol to search for downed lines.

Staff-2
Ref 1: Manager's Summary, Page 23

a) Please provide a breakdown of all CNPI's internal labour costs applicable for the affected period using the following format.

Department	Number of Eligible Employees	Regular Hours Worked	Total Regular Time Payments	Overtime Hours Worked	Total Overtime Payments
Management					
Other Non-Union Employees					
Sub-Total Non-Union					
Union Employees					
Operations					
Other					
Sub-Total Union					
Total Internal Labour for Affected Parties					
Total Z-Factor Labour Costs					

b) Please provide CNPI's policy with respect to overtime for its non-union employees and management.
c) Please describe whether the z-factor labour costs included payments made to union employees at regular rates of pay for work on pre-scheduled vacation days.

RESPONSE:

a) The requested table has been populated on the following page, using the following assumptions:
   i. "Management" includes all non-union managers and Operations supervisors
   ii. Union employees are divided into Operations (Lines, Electricians, Control Room, Metering) and Other (Customer Service, Stores)
   iii. All employees who assisted with any aspect of the storm response are included
   iv. In addition to supporting the labour component of CNPI's Z-factor claim, rows were added at the bottom of the table to allow the total labour costs related to the storm response to be reconciled with the total storm costs presented in the Manager's Summary (i.e. including those storm costs for which CNPI is not seeking Z-factor cost recovery).

Department	Number of Eligible Employees	Regular Hours Worked	Total Regular Time Payments	Overtime Hours Worked	Total Overtime Payments
Management	5	176	$14,936	N/A - See response to part b)	
Other Non- Union Employees (Health and Safety)	1	16	$1,360		
Sub-Total Non-Union	6	192	$16,296		
Union Employees					
Operations	20	583.5	$57,362	721.25	$99,008
Other	18	252.5	$17,028	313.25	$34,019
Sub-Total Union	38	836	$74,390	1034.5	$133,027
Total Internal Labour for Affected Parties	**44**	**1028**	**$90,686**	**1034.5**	**$133,027**
Total Z-Factor O&M Labour Costs		*0*	*$0*	*784.25*	*$102,267*
Total non-Z-Factor O&M Labour Costs		*223*	*$15,903*	*0*	*$0*
Total non-Z-Factor Capital Labour Costs		*805*	*$74,783*	*250.25*	*$ 30,760*

b) CNPI does not pay overtime for non-union employees and management.

c) Z-Factor labour costs do not include any such payments. As indicated in Schedule I of the application and confirmed in the table in part (a), the only internal labour costs included in CNPI's Z-Factor claim are non-capital, overtime costs of $102,267.

Staff-3
Ref 1: Manager's Summary, Page 18-24

CNPI did not indicate whether or not it assisted neighboring communities once power was restored to its customers.

a) Please confirm whether or not CNPI assisted other LDCs.
b) If CNPI did assist neighboring communities, did it charge a premium to assist other LDCs?

RESPONSE:

a) To the best of CNPI's knowledge there were no widespread outages in neighbouring communities following CNPI's restoration efforts, and CNPI therefore did not assist other LDCs.

b) N/A based on reply to a).

Staff-4
Ref 1: Manager's Summary, Page 18-24

Provide CNPI's annual Emergency Maintenance amounts (budgeted and included in base distribution rates, compared to actual expenditures), for the period 2016 and to-date.

RESPONSE:

Please see response to VECC-1.

Staff-5
Ref 1: Manager's Summary, Page 20-21

In its application, CNPI noted that a significant number of poles had to be replaced due to the October/November 2019 storm. The associated capital costs identified in the application is $516,896.

a) Has all restoration work been completed? If not, please describe the work that remains from the storm, and provide the estimated costs.
b) Please explain how CNPI differentiates between any asset replacement required as a result of the storm and accelerated retirements required due to conditions deteriorating at a greater rate than typically expected.
c) Please describe the nature of any Professional Engineer recommendations relied upon by CNPI when determining whether poles or other asset required replacement.

RESPONSE:

a) All storm restoration work was completed prior to the end of November 2019.

b) CNPI has regular inspection and maintenance programs, in accordance with the OEB's Distribution System Code Appendix C requirements, that would have identified any assets that were deteriorated prior to the storm. Any such assets would have been identified for replacement separately from the storm response. Only those assets that failed as a result of storm damage (i.e. where crews discovered broken poles or downed wire while responding to outages during and immediately following the storm) were replaced during the storm. If any of these assets had failed prior to the storm, it would have resulted in power outages that CNPI would have been notified of prior to the storm event.

   Further, CNPI notes that while it provided detail on the total cost of the storm response, it did not request Z-factor cost recovery of either the capital costs, or the incremental return on capital, related to this storm event. As such, the rate base impact would be the same whether the assets were replaced during the storm event, or were otherwise replaced at any other time in 2019, since the net book value of all 2019 capital investments would be added to CNPI's rate base in its 2022 rebasing application. CNPI simply provided a summary of the capital effort associated with the storm for context of the overall storm response.

c) CNPI does not rely on Professional Engineer recommendations for replacing assets during storm events or during outage response in general. For most assets where failure (during a storm or otherwise) results in an outage, CNPI replaces the asset like-for-like and/or in accordance with its pre-approved distribution design and construction standards as part of its outage restoration.

Staff-6
Ref 1: Manager's Summary, Page 18-24

In light of the COVID-19 pandemic and the economic effects it may have on CNPI's customer base, please explain whether CNPI has:

a) considered absorbing the cost of the storm, in part or in full, in lieu of a requesting recovery from its customers.
b) considered deferring collection of the cost of the storm, in part or in full, to a future period.
c) performed an assessment on its customers' current ability to pay for an incremental amount related to the z-factor, given the current economic environment.
d) considered any other bill impact mitigation strategies to assist its customers in being able to absorb this incremental amount.

RESPONSE:

a) As discussed in response to Staff-5 b) above, CNPI decided not to seek recovery of capital costs related to the storm event through the Z-Factor mechanism. CNPI is therefore absorbing the incremental depreciation expense associated with the capital costs, and is foregoing the incremental return on rate base for the 2021 rate year.

b) CNPI considered deferring the collection of these costs, but determined that since changes in other rate riders in 2021 will result in net decreases in the total bill amounts for most rate classes, even with the Z-Factor rate rider (as shown in Table 12 of the Manager's Summary), it would be preferable to recover the cost in 2021 as opposed to 2022, which is CNPI's next rebasing year. As discussed above, CNPI is foregoing the annual capital related revenue requirement associated with the storm-related capital investments. Starting with its next COS application, currently scheduled for 2022, CNPI will begin recovering the capital related revenue requirement associated with those capital investments in the normal course to the extent those investments are approved by the OEB for inclusion in CNPI's regulated rate base.

c) CNPI continues to offer flexible payment arrangements and promote programs for additional support (e.g. CEAP, LEAP, OESP) for customers who have difficulty paying their bills. As discussed above, the application results in a total bill decrease for most customer classes inclusive of the impact of the requested Z-Factor rate rider.

d) See responses above.

Staff-7
Ref 1: Manager's Summary, Page 18-24

Please complete the following table:

	2018	2019	2020 Forecast
Deemed ROE			
Achieved ROE			
Difference			

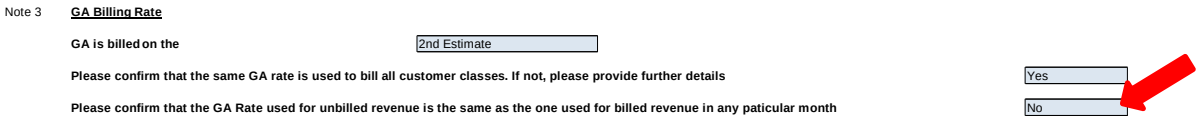
RESPONSE:

	2018	**2019**	**2020 Forecast**
Deemed ROE	8.78%	8.78%	8.78%
Achieved ROE	6.58%	5.84%	Less than 6%
Difference	-2.2%	-2.94%	Less than -2.78%

Note that 2020 forecast ROE values are based on September YTD earnings being lower in 2020 as compared to 2019, which will likely result in CNPI's 2020 achieved ROE being comparable or lower than CNPI's 2019 achieved ROE, subject to uncertainty in Q4 2020 results.

Staff-8
Ref: GA Analysis Workform – Note 3 – GA Billing Rate

OEB staff noted CNPI is not using the same GA Rate used for unbilled revenue as the one used for billed revenue in any particular month. Please see below:



OEB staff also noted that CNPI's explained this in its 2020 IRM application as follows:

"Given the 2nd GA estimate is not yet available at the time the first unbilled report is run, the 1st GA estimate is therefore applied to all non-interval customer unbilled estimates in order to meet the tight financial reporting deadlines".[1]

Please confirm that the above explanation continues to apply for 2019. If not, please explain the use of a different GA rate for the purposes of unbilled revenue.

[1] CNPI – EB-2019-0024, Staff questions_CNPI_responses_20190912.docx, page 3 of 8.

RESPONSE:

CNPI confirms the above explanation continues to apply for 2019.

Staff-9

Ref: Filing Requirements for Electricity Distribution Rate Applications, Chapter 3
EB-2020-0008 Application, Pages 17 & 24

CNPI proposes to dispose of the Street Lighting Lost Revenue Adjustment Mechanism Variance Account (LRAMVA) balance over a period of 48 months as the annual bill change is an increase of 12.1% when considering LRAMVA balances in isolation. However, the total bill increase for Streetlighting customers is 2.5% when considering all application claims.

Please explain the rationale of a 48-month disposition period. In the response, please provide a range of disposition periods and the associated rate impacts.

RESPONSE:

For clarity, the bill impact amount presented at the above reference was taken from Tab 20 of the OEB's IRM Rate Generator Model, prior to CNPI's proposed adjustment of the LRAMVA rate rider to reflect a longer disposition period. This can be confirmed by changing the value in Cell I485 on Tab 20 of the IRM Rate Generator Model filed with the application back to the originally calculated rate rider of $13.1490. As explained in the Manager's Summary, CNPI changed the value of the rate rider in Tab 20 of the IRM Rate Generator Model to $3.2873 (i.e. $13.1490 x 12/48) for consistency with its proposed bill mitigation. The 2.5% bill increase therefore includes the effect of the proposed mitigation, and the total bill increase without mitigation would have been 12.1% (based on CNPI's original LRAMVA claim).

CNPI has prepared the table below to reflect total bill impacts for the Street Lighting rate class, following all of the updates to the LRAMVA Workform and corresponding updates to the IRM Rate Generator Model detailed in response to Staff-11 through Staff-14. Changes made in these IRRs result in an increase to the LRAMVA claim for the Street Lighting rate class, such that the rate rider required for a 12-month disposition period is $25.0829/kW. The total bill impacts for other disposition periods were determined by replacing this value in Tab 20 of the IRM Rate Generator Model with the reduced rate riders that would result from longer disposition periods, as per the table below. CNPI continues to propose a 48-month disposition period to mitigate bill impacts.[1]

Disposition Period	LRAMVA Rate Rider ($/kW)	Total Bill Impacts – Street Lighting Rate Class			
		2020	2021	Change 2020 to 2021	
				$	%
12 Months	25.0829	1,742.71	2,155.08	412.37	23.7%
24 Months	12.5415	1,742.71	1,942.51	199.80	11.5%
36 Months	8.3610	1,742.71	1,871.65	128.94	7.4%
48 Months	6.2707	1,742.71	1,836.22	93.51	5.4%

[1] Note that Tab 19 of the IRM Model will revert to the 12-Month rate rider, and the final tariff will need to be manually adjusted if the longer disposition period is approved.

Staff-10
Ref: LRAMVA Workform, Tab 3-a

The Retrofit program electricity savings allocations for the GS < 50 kW, and GS > 50 kW rate classes are extracted from a separate Excel spreadsheet titled 'Temagami CNP CDM Export'. This Excel spreadsheet was not provided as part of the application submission.

Please provide an unlocked copy of the 'Temagami CNP CDM Export' Excel spreadsheet with all cells visible to show all calculations. Please ensure that any confidential information is removed or treated in accordance with Rule 9A of the OEB's *Rules of Practice and Procedure* (in response to this question or any other subsequent LRAMVA-related inquiry).

RESPONSE:

The requested spreadsheet has been filed with these interrogatory responses as "CNP_IRR_Staff-10.xlsx". All confidential information such as names, addresses, account numbers and any descriptions that could be used to potentially identify an individual customer have been removed as this information is not required to substantiate the electricity savings included in the LRAMVA workform.

CNPI confirms that the information in this spreadsheet is consistent with the information included in Tab 8 of the LRAMVA workform submitted with the application. Specifically, the projects that appear when completion dates on the 'LRAMVA' tab are filtered for the range of May to December of 2019 represent the projects completed after the IESO stopped publishing participation and cost reports. These projects were therefore listed on the modified Tab 8 of the LRAMVA Workform, and entered in the 'True-Up' row for 2019 savings.

Note that the certain calculations at the bottom of the LRAMVA tab of the CNPI_IRR_Staff-10 spreadsheet and in the LRAMVA Workform have been modified as described in the responses to subsequent IR's and as summarized in Tab 1a of the LRAMVA Workform.

Staff-11
Ref: LRAMVA Workform, Tab 5

The LRAMVA balance adjustment for the 2017 savings for the Save on Energy Coupon, Save on Energy Heating and Cooling, and Save on Energy Retrofit programs could not be reconciled to the IESO Participation & Cost reports filed.

Please identify the source documentation for these 2017 LRAMVA balance adjustments. If this documentation was not filed as part of the pre-filed evidence in this proceeding, please provide a copy.

RESPONSE:

Please see the table and explanations on the following page, with cell references for energy savings. The same explanation applies to demand savings, using the corresponding demand savings cell from each of the spreadsheets referenced.

Program	Value	Cell References for Various Spreadsheets		
		LRAMVA Tab 5	***2019 04 P&C 'LDC Progress'***	***2017 Final Verified Results 'LDC Savings Persistence'***
Coupon	1,638,227	D471	BA5	CI433
	1,318,579	E471:G471	CE5	CJ433:CL433
	2,290	D472	BB5	*See Note 1
	2,280	E472:F472	*See Note 2	
	2,271	G472	CF5	*See Note 1
Heating and Cooling	171,189	D474	BA6	CI435
	171,189	E474:G474	CE6	CJ:CL435
	14,490	D475	BB6	*See Note 1
	14,490	E475:F475	*See Note 2	
	14,490	G475	CF6	*See Note 1
Retrofit	3,373,467	D487	BA15	CI439
	3,399,033	E487:G487	CE15	CJ439:CL439
	127,358	D488	BB15	*See Note 1
	127,043	E488:F488	*See Note 2	
	126,728	G488	CF15	*See Note 1

Note 1: Columns BB and CF of the 'LDC Progress' tab of the 2019 04 IESO participation and cost report provide adjustments to 2017 CFF program savings. Column BB represents incremental energy savings for 2017 that were not included in the IESO 2017 Final Verified Results, typically due to timing between when certain measures were implemented, compared to when the related applications are closed out with the IESO. These values were entered into Column D (true-up for 2017 energy savings from 2017 CFF programs). Likewise, Column CF represents the same true-up, but adjusted for the amount of savings estimated to persist to 2020. These values were entered in Column G (true-up for 2020 persisting savings from 2017 CFF programs).

Note 2: The IESO's 2017 Final Verified Results report was the last report to provide estimates of persisting savings from CFF annual program results on a year-by-year basis. Subsequent participation and cost reports only provide detail for verified savings and true-ups for the year in question, and 2020 persisting savings (i.e. only 2017 savings and 2020 persisting savings are available for 2017 CFF program results). In the original application, CNPI used an average of the 2017 savings adjustment and the 2020 persisting savings adjustment to estimate the persisting savings adjustments for 2018 and 2019. In responding to this IR CNPI observed that the original 2018 and 2019 persisting savings estimates for these programs in the 2017 Final Verified Savings report were equal to the 2020 persisting savings estimates. Accordingly, CNPI has revised the 2018 and 2019 persisting values to be equal to the 2020 persisting values.

Staff-12
Ref: LRAMVA Workform, Tab 5

Energy and demand savings are being claimed for the 2019 Energy Retrofit program.

a) Please provide a breakdown of the individual initiatives, including the energy and demands savings of each, that resulted in verified LRAMVA amounts for the 2019 Energy Retrofit program. Please include the energy and demand savings from Streetlighting as a single line item.

b) The rate class allocations for the 2019 Energy Retrofit program are reported as 25.71% for the GS < 50 kW rate class and 74.29% for the GS > 50 kW rate class. Please confirm whether these rate class allocations are valid for both Energy Retrofit and Streetlighting, as the savings values for each are reported together.

RESPONSE:

a) For clarity, as described on pages 15-16 of the Manager's Summary, CNPI used the 2019 "Verified" savings row of the LRAMVA model to enter savings consistent with the IESO's April 2019 participation and cost report, even though those savings are technically unverified. This allowed CNPI to use the subsequent "True-Up" row to enter the May-December 2019 savings as listed on the modified Tab 8 of the LRAMVA Workform, which were not included in any IESO reports.[2] The purpose of this approach was to allow for ease of reconciling each amount back to either the IESO April 2019 report, or the additional 2019 project list added to Tab 8 of the LRAMVA Workform.

   In responding to this IR, CNPI requested that the IESO confirm the projects/measures that comprised the that were included in the 2019 Retrofit program net savings of 397,114 kWh. This list has been filed as "CNPI_IRR_Staff-12a.xlsx". None of the values in this list are related to Streetlighting accounts.

   CNPI further noted in reviewing the additional information provided by IESO that the savings identified in the IESO's April 2019 participation and cost report include only projects completed between January to March 2019. As such the project list for additional 2019 Retrofit savings provided in Tab 8 of the LRAMVA Workform inadvertently excluded a project completed in April 2019 that was not included in the IESO report. While the associated energy and demand savings are immaterial, CNPI has nevertheless added this project to the updated LRAMVA Workform submitted with these IR responses.

b) The 2019 Retrofit program savings do not include any savings related to Street Lighting accounts. The supporting calculations for the 2016-2019 GS<50 to GS>50 allocation of Retrofit program savings, which accounted for savings related to Street Lighting projects in 2016 and 2017, are shown at the bottom of the 'LRAMVA' tab of the CNPI_IRR_Staff-10 spreadsheet. In the initial LRAMVA Workform, CNPI had included savings for Street Lighting projects within the Retrofit program savings, but had adjusted the allocation ratios

[2] The project list on the modified Tab 8 of the LRAMVA Workform is further substantiated by the spreadsheet filed in response to Staff-10.

to account for this. Specifically, for any year in which there were Street Lighting energy savings, the percentage of Street Lighting savings to total Retrofit savings was determined, and the GS<50 to GS>50 allocations were reduced proportionally as illustrated in Tab 3-a of the LRAMVA Workform. Per the response to Staff-13(b), CNPI has now separately quantified the Street Lighting savings allocations in separate rows in Tab 5 of the LRAMVA Workform and applied the GS<50 to GS>50 allocation ratios to the remaining Retrofit program savings consistently in all year

Staff-13
Ref: LRAMVA Workform, Tab 8

The OEB Filing Requirements identify specific information that must be filed to support Streetlighting LRAMVA claims.

a) In Microsoft Excel format, please provide the detailed calculations underpinning the claimed Streetlight savings. This includes, but is not limited to, the type of bulb that was replaced, and the pre- and post-bulb replacement wattage. In the response, please provide the required statements on eligibility of the Streetlighting energy demand savings.

b) Please confirm whether the claimed Streetlighting savings have been deducted from the respective Retrofit program(s).

RESPONSE:

a) The requested detailed calculations have been added to Tab 8 of the updated LRAMVA Workform, specifically Tables 8-d and 8-e, as described in the response to part b) below.

CNPI confirms that the following assumptions from prior cost of service applications are reflected in Tab 2 of the LRAMVA Workform, such that its LRAMVA claim reflects only the amount by which actual revenue reductions exceed the forecasted reductions included in the relevant applications:

i. CNPI's 2013 cost of service application did not contain any reductions in Street Lighting demand in the load forecast and did not include any LRAMVA thresholds
ii. CNPI's 2017 cost of service application reflected a reduced Street Lighting demand due to historical trending (i.e. 2017 Street Lighting forecast was based on 2015 actuals), and included LRAMVA thresholds as entered in the LRAMVA Workform

CNPI confirms that Street Lighting replacements resulting in the savings indicated in the LRAMVA Workform are attributable to participation in the IESO's Retrofit program, and that these replacements would not have occurred otherwise. CNPI further confirms that the demand savings added to Tables 8-d and 8-e of the LRAMVA Workform are based on the number and type of bulbs confirmed to have been replaced under the IESO-funded program, as tracked in CNPI's settlement systems.

Finally, CNPI confirms that in the course of adding the additional Street Lighting detail to the LRAMVA Workform as described in this response, it has subtracted amounts from the Retrofit program savings totals in the LRAMVA Workform as required to ensure that savings are not double-counted.

b) Street Lighting savings were initially included in the Retrofit program savings, with class allocations adjusted as required, as described in response to Staff-12 b).

In consideration of the response to part a) above, the LRAMVA Workform has been updated as follows:

i. Net energy savings for 3 Street Lighting projects under the Retrofit program were included in a new Table 8-c on Tab 8
ii. Tables 8-d and 8-e were added to Tab 8 to confirm the actual reduction in billed Street Light demand by month resulting from these same 3 Street Lighting Projects
iii. The 'High Performance New Construction' program rows on Tab 5 (previously unused as CNP had no savings related to this program) were replaced with the Retrofit Street Lighting energy savings from the new Table 8-c and demand savings from new Tables 8-d and 8-e
iv. The Retrofit Program savings rows on Tab 5 were adjusted to exclude Street Lighting by subtract the net energy savings associated with Street Lighting Projects (note that no similar adjustments were made for demand since the IESO-reported results for the Retrofit program indicated 0 demand reduction for the three Street Lighting projects)
v. The remaining Retrofit energy and demand savings (i.e. reported program savings less reported Street Lighting savings) are allocated 25.71% to the GS < 50 kW and 74.29% to the GS > 50 kW rate classes, based on the calculations provided in Tab 3-a of the LRAMVA Workform
vi. Since the demand savings related to Street Lighting projects on Tab 5 of the LRAMVA Workform are linked to the annual demand reductions as calculated on Tab 8, the demand multipliers on Tab 5 were changed from 12 to 1 to reflect the use of annual rather than monthly reductions in billed demand.

Staff-14

Please provide an updated IRM Model Rate Generator and LRAMVA Workforms reflecting any changes required in response to OEB Staff interrogatories, as required. Please indicate all changes in Tab 1-a of the LRAMVA Workform.

RESPONSE:

CNPI has updated the LRAMVA Workform to reflect the adjustments described in response to Staff-11, Staff-12(a) and Staff-13(b) above. The following table summarizes the change in CNPI's LRAMVA claim as a result of the adjustments made in response to the all interrogatories.

Responses to Staff-11 and Staff-12(a) resulted in relatively immaterial changes while adjustments made in response to Staff-13(b) were the primary driver for changes in CNPI's overall LRAMVA claim.

Rate Class	Application	IRR		
		LRAMVA Workform	2020 Interest	Total
Residential	153,008	150,439	1,989	152,429
General Service Less Than 50 kW	283,420	268,787	3,554	272,341
General Service 50 to 4,999 KW	(296,854)	(209,227)	(2,767)	(211,994)
Street Lighting	56,573	106,102	1,403	107,505
TOTAL	**196,147**	**316,102**	**4,180**	**320,282**

The IRM Rate Generator model was also updated to reflect the resulting changes in the amount of CNPI's LRAMVA disposition request, along with updates to the associated class allocations, rate riders and bill impacts.

The updated models have been filed as "CNP_IRR_2021_LRAMVA_Workform_20201015.xlsx" and "CNPI_IRR_2021-IRM-Rate-Generator-Model_20201015.xlsb".

No changes were made as a result of the responses to any other interrogatories.

VECC-1
Ref: Manager's Summary, Page 18-24

a) Please describe all budgets included in CNPI's base rates related to emergency response – capital and operating.

b) Please provide budgeted amounts and actuals for the accounts in part (a) for the years 2015 to 2020.

c) Please provide CNPI's vegetation management budgeted amounts and actuals for the years 2015 to 2020.

d) Please provide the number of Customer Interruptions and Customer Interruption Hours due to Tree Contacts for the period 2015 to 2020.

RESPONSE:

a) Consistent with the 2017 Budget amounts presented in response to part b), $39,977 in O&M and $6,597 in capital were included for outage/storm response in CNPI's last rebasing application (EB-2016-0061 for rates effective January 1, 2017). Both amounts are significantly lower than CNPI's materiality threshold, therefore these amounts were not included as individual line items.

b) Please see the following tables (2020 YTD values are current to September 30):

O&M Outage/Storm Response Budget vs. Actual

Year	Budget ($)	Actual ($) (non-Z-Factor)	Actual ($) (Z-Factor)	Variance ($)
2015	0	36,325	0	36,325
2016	16,500	0	0	-16,500
2017	39,977	13,553	0	-26,424
2018	69,894	89,766	0	19,872
2019	24,313	83,981	258,050	317,718
2020 YTD	25,391	12,261	0	-13,129

Capital Outage/Storm Response Budget vs. Actual

Year	Budget ($)	Actual ($)	Variance ($)
2015	91,041	102,269	11,228
2016	24,957	16,187	-8,770
2017	6,597	26,232	19,634
2018	0[1]	190,417	190,417
2019	0	803,443	803,443
2020 YTD	0	22,188	22,188

Note 1: CNPI stopped identifying storm-related amounts separately in its capital budgets in 2018 due to the immateriality of recent spending.

c) Please see the following tables:

Vegetation Management Budget vs. Actual

Year	Budget ($)	Actual ($)	Variance ($)
2015	515,913	464,165	-51,748
2016	505,238	447,394	-57,843
2017	480,667	442,527	-38,140
2018	485,070	478,201	-6,869
2019	500,039	530,240	30,201
2020 YTD[1]	524,085	296,481	-227,604

Note 1: 2020 YTD budgeted amount is for the entire calendar year, while YTD actual represents spending to September 30. Based on work completed and released at the time of filing these IR responses, CNPI anticipates spending the remainder of its 2020 vegetation management budget in Q4.

d) Please refer to the tables below. 2020 YTD information is current to September 30.

Code 3 - Tree Contacts (Total)	2015	2016	2017	2018	2019	2020 YTD
Customer Interruptions	19,789	13,873	22,253	20,558	22,155	15,674
Customer Interruption Hours	17,735	20,766	47,382	32,692	36,265	26,000

Code 3 - Tree Contacts (MED Only)	2015	2016	2017	2018	2019	2020 YTD
Customer Interruptions	0	0	8,232	2,507	4,939	0
Customer Interruption Hours	0	0	20,958	6,423	18,680	0

Code 3 - Tree Contacts (Excluding MED)	2015	2016	2017	2018	2019	2020 YTD
Customer Interruptions	19,789	13,873	14,021	18,051	17,216	15,674
Customer Interruption Hours	17,735	20,766	26,424	26,269	17,585	26,000

VECC-2
Ref: Schedule 1 P 1

CNPI provides the following total cost breakdown.

October/November 2019 Storm - Total Cost Breakdown

Cost Category	Captial	O&M	Account 1572	Total
CNPI Labour (Regular)	$74,783	$15,903	$0	**$90,686**
CNPI Labour (Overtime)	$30,760	$0	$102,267	**$133,027**
Materials	$56,480	$0	$8,000	**$64,480**
LDC Mutual Aid Costs	$0	$0	$84,802	**$84,802**
Contracted Services:				
Line Services	$329,460	$0	$39,651	**$369,111**
Excavation and Tree Removal	$23,614	$0	$22,155	**$45,769**
Other	$1,800	$0	$1,175	**$2,975**
Total	**$516,896**	**$15,903**	**$258,050**	**$790,849**

Please provide a description and breakdown of LDC Mutual Aid Costs of $84,802.

RESPONSE:

The LDC Mutual Aid costs relate to storm-response efforts provided by Niagara Peninsula Energy Inc. and Welland Hydro. These LDCs assisted with outage response, non-capital repairs, switching and restoration. Please see response to Staff-1(d) for a breakdown of these costs.

SEC-1

[Ex.1, p.21] Please provide a breakdown of the Z-Factor claim associated with each of CNPI's internal labour (i.e. overtime costs) and third-party costs.

RESPONSE:

Please see responses to Staff-1(d) and Staff-2(a).

SEC-2

[Ex.1, p.20] Please provide the 2019 year-end total OM&A broken down by each of the major categories (i.e. operations, maintenance etc.).

RESPONSE:

Category	**2019 Total Cost**
Operations	$1,921,232
Maintenance	$2,058,652
Billing and Collecting	$1,579,098
Community Relations	$55,763
Admin & General	$4,503,696
Total OM&A (Excl LEAP)	**$10,118,441**

SEC-3

[Ex.1, p.22] The Applicant states: “Due to the infrequent and extreme nature of such events, CNPI has not planned or budgeted for such events, and as such, the costs of this extreme and unusual event are incremental to the costs underpinning CNPI’s most recent cost of service application in 2017.” Did the Applicant include in its most recent cost of service application a budgeted OM&A amount related to *any* storm restoration or other unanticipated operations and maintenance costs? If so, please provide that amount and the corresponding 2019 actuals. If not, please explain how storm restoration and operations and maintenance costs are normally considered in the Applicant’s budgeting process.

RESPONSE:

Please see response to VECC-1.

SEC-4

Please provide the Applicant's 2019 regulated ROE. Please provide a copy of the supporting calculations.

RESPONSE:

CNPI's regulated ROE for 2019 is 5.84%. Supporting calculations consistent with CNPI's RRR 2.1.5.6 filing are provided in Appendix SEC-4.

APPENDIX STAFF-1

Storm Contingency		
	Document No.:	BCP-02A-FO
	Page:	1 of 1
	Region:	All Regions
	Issued:	2019-09-01
	Issue No.:	2.0

A major storm – ice, wind, snow, etc. – could seriously impact the continuity of electrical supply. Large portions of, or even the entire distribution system, could be out of service for days or even weeks while repairs are affected. An effective response to such a major disaster requires a coordinated effort across a wide cross-section of the Company's resources.

The following documents outline how the restoration will be coordinated. The overall organization of the restoration effort is illustrated in the Major Storm Restoration Coordination chart. In the Niagara, Eastern and Algoma Regions, a Restoration Coordinator is identified who will be responsible for coordinating the overall restoration effort. The Restoration Coordinator will be assisted by key personnel throughout the organization. The Roles and Responsibilities of these key personnel are tabulated in the accompanying spreadsheet.

Emergency Response Roles and Responsibilities of Key Personnel

Function	Key Contact	Responsibilities	Resources
Restoration Coordinator	Regional Manager	Direct organized shutdown of system components if required.	System Control Line Crews Electrical Crews Metering Crews P&C Personnel
		Co-ordinate damage assessment.	Line Crews Electrical Crews Metering Crews P&C personnel Planners Engineers
		Develop restoration plan, deploy resources, and oversee restoration.	System Control Line Crews Electrical Crews Metering Crews P&C personnel
		Arrange for external assistance as required.	Neighboring utilities Other Fortis utilities
		Liaise among Restoration personnel, Customer Service, and Executive.	Customer Service Manager Operations Clerk Executive Assistant

Customer, Corporate Communications and Human Resources	Director, Corporate & Customer Services	Customer communications – coordinate customer calls, provide information to customers. Liaise with media and external entities (City, Emergency Services, etc.). Co-ordinate meals, accommodations, etc. for personnel involved in restoration. Provide other assistance as required.	Customer Service personnel Operations Clerk Executive Assistant Human Resources
Line Construction	Manager Operations Line Supervisor	Perform line patrols for damage assessment. Assist with developing restoration plan. Perform required repairs. Perform switching operations. Organize and liaise with contractors and crews from other utilities.	Line Crews Contract Line Crews Line Crews from other utilities.
Electrical	Manager Operations Electrical Specialist	Inspect substations for damage assessment. Assist with line patrols as required. Assist with developing restoration plan. Perform repairs as required. Perform switching operations. Organize and liaise with contractors and crews from other utilities.	Electrical Crews. Metering Crews. P&C personnel. Contractors Other utility crews
System Control	Manager Operations Supervisor, System Control	Direct switching operations. Maintain outage data. Assist with developing restoration plan. Liaise with field crews. Liaise with external entities – IESO, Hydro One, National Grid, and NYISO.	System Control Operators.
Protection & Control/SCADA	Manager Operations SCADA/P&C Coordinator	Assess damage to P&C and SCADA systems. Assist with Line patrols and substation assessments. Perform required repair.	P&C personnel Metering crews Contractors

Metering	Manager Operations Supervisor, Meter Services	Assess damage to bulk meter facilities. Assist with line patrols and substation inspections. Assist with development of restoration plan. Perform required repairs. Perform underground locates. Organize and liaise with contract personnel.	Metering crews P&C personnel Contractors Other utility crews.
Planning / Engineering	Manager Technical Services Supervisor Planning	Assist with damage assessment. Prepare plans/designs as required. Assist with underground locates. Provide other assistance as required.	Engineers Planning staff
Facilities, Fleet, and Stores	Manager Operations Supervisor, Facilities Maintenance	Assess damage to fleet vehicles. Procure and assign vehicles as required. Assess damage to facilities. Co-ordinate materials procurement and delivery. Assist with patrols and inspections as required. Perform required repairs to facilities and fleet. Organize and liaise with contractors.	Facilities personnel Contractors Suppliers
Health, Safety & Environment	Manager, Health, Safety & Environment - Corporate Senior Advisor HS&E	Monitor safety of field crews. Assist with managing environmental issues. Liaise with external entities – MOL, MOE, and EUSA.	HS&E personnel
Information Technology	Manager, Information Technology	Assess damage to IT facilities and co-ordinate repairs Co-ordinate operation of Disaster Recovery Site	IT personnel
Other Support	Manager, Regulatory Affairs – Corporate Manager, Manager Regulatory Accounting Manager, Financial Reporting	Aid as required.	

Outage Communication Procedures		
	Document No.:	BCP-03A-NR
	Page:	1 of 6
	Region:	Niagara
	Issued:	2019-09-01
	Issue No.:	2.0

Table of Contents

1.0 Level 1 Outage (during business hours)

1. Power Assist or Customer Service Representative (CSR) takes the initial call and enters information into "***Calls Manager"***

2. The System Control Operator relays information to the Line Service Crew, which responds to the call. The Service Crew then liaises with the System Control Operator on the progress of the restoration.

3. The CSR who received the initial call will email the Customer Service department with information about the outage to help facilitate effective response to customer enquiries. The CSR who took the initial call will log a work order in SAP and in the OMS as instructed. All subsequent calls will be logged through customer notifications.

4. The System Control Operator will liaise with the Customer Service Supervisor on the progress of the restoration.

5. CSRs will continue to take any further trouble calls from customers and contact the Control Room with the additional information. If there are several calls coming in from the same street or area, it would be an indication of a localized problem affecting multiple customers (e.g. a spur line or transformer fuse blown). In such a case, the System Control Operator would advise the Customer Service Supervisor not to provide any more outage information related to the same area.

6. In some cases, a more widespread outage can develop, or it may become apparent that the outage is more widespread than initially thought. In such a case, when the volume of incoming calls increases rapidly, the System Control Operator will advise the Customer Service Supervisor not to provide any more information to the Control Room. From that point, any further calls will be logged in the OMS. The System Control Supervisor or designate will become the liaison with the Customer Service Supervisor in accordance with the procedures below for Major Outages.

2.0 Major Outage (during business hours) – Feeder Outage (additional crews required)

If there is advance whether information that would indicate the potential significance of any major storm, the primary response team will gather and ensure strategic contingencies, resources, and any other requirements are in place prior to the event.

1. CSR takes the initial call and then contacts the System Control Operator who dispatches the Line Service Crew.

2. In some cases, the System Control Operator will be alerted to a feeder outage via SCADA indications. In such a case, the Operator will contact the Line Lead Hand and the Customer Service Supervisor.

3. The CSR who received the initial call or Customer Service Supervisor will email the Customer Service department of the outage to facilitate effective response to customer enquiries. All CSRs will log into the ACD (Automatic Call Distribution). The CSR who took the initial call will log a work order in SAP.

4. No further contact will be made with the Control Room. The System Control Supervisor or designate will liaise with the Customer Service Supervisor on the progress of the restoration.

5. At this time, the phones will be switched into Emergency Mode (refer to Tab 6).

6. Any further calls will be logged in the OMS. If the call is of an urgent nature it will be logged as a 'type 1' notification so they can be isolated when analyzing the report. Calls unrelated to the initial outage or that provide additional information, will have a work order created and will be printed to the System Control printer, which will be monitored by the System Control Operator. The OMS and outage map will be utilized.

7. Upon receiving information from the Control Room that the outage duration is expected to be greater than two hours, the affected Key Customers (refer to Tab 7) will be contacted to make them aware of the situation. The Customer Service Supervisor/Manager will assign CSR to assist in making these calls if necessary.

    a. Please note: Fort Erie's Douglas Memorial Hospital (Feeder 1263 & 1264) has requested that they are called if the outage is expected to last for longer than one hour. Refer to Emergency Contact List (Tab 1) for updated contact information.

b. For the Town of Fort Erie, please contact the Operations Manager, Fire Chief and CAO at the onset of any outages. Refer to Emergency Contact List (Tab 1) for updated contact information.

c. In Port Colborne, please contact the CAO at the onset of any outages. Refer to Emergency Contact List (Tab 1) for updated contact information.

3.0 Minor Outage (after office hours, with a System Control Operator on duty) – typically handled by a single crew (this scenario rarely occurs as there is only one control room shift now)

1. The after-hours call centre will take the customer call and contact the Control Room.

2. The lineperson will liaise with the Control Room regarding the status of the outage. Customer Communications will continue to be handled by the afterhours call centre. If the outage is more widespread and assistance is required to handle customer communications, the Control Room will call in a CSR in accordance with the CSR callout schedule.

3. If the outage affects Douglas Memorial Hospital or affects a large area in Fort Erie or Port Colborne, then the Control Room will notify the Customer Service Manager/Supervisor. The Customer Service Manager/Supervisor will contact these external entities following the protocol below:

   a. Fort Erie's Douglas Memorial Hospital (Feeder 1263 & 1264) has requested that they are called if the outage is expected to last for longer than one hour. Refer to Emergency Contact List (Tab 9) for updated contact information.

   b. In Fort Erie, please contact the Operations Manager, Fire Chief and CAO at the onset of any outages. Refer to Emergency Contact List (Tab 1) for updated contact information.

   c. In Port Colborne, please contact the CAO at the onset of any outages. Refer to Emergency Contact List (Tab 1) for updated contact information.

4.0 Minor Outage (after business hours, with no System Control Operator on duty) – typically handled by a single crew

4. The after-hours call centre will take the customer call and contact the lineperson on call in accordance with the schedule provided.

5. The lineperson will liaise with the afterhours call centre regarding the status of the outage. If the outage is manageable by one crew and will be less than two hours the after hours call centre will handle the customer communications. If the outage is more widespread and assistance is required to handle customer communications, the Customer Service Supervisor/Manager will be called to request staff report to the Fort Erie Service Centre if the After Hours Call Centre is unable to handle the call volumes

6. If the outage affects Douglas Memorial Hospital (the call centre staff will inquire to this) or affects a large area in Fort Erie/Port Colborne the following protocol will be followed:

    a. Fort Erie's Douglas Memorial Hospital (Feeder 1263 & 1264) has requested that they are called if the outage is expected to last for longer than one hour. Refer to Emergency Contact List (Tab 1) for updated contact information.

    b. In Fort Erie, please contact the Operations Manager, Fire Chief and CAO at the onset of any outages. Refer to Emergency Contact List (Tab 1) for updated contact information.

    c. In Port Colborne, please contact the CAO at the onset of any outages. Refer to Emergency Contact List (Tab 1) for updated contact information.

5.0 Major Outage (after business hours, with System Control Operator on duty) – Feeder Outage (additional crews required)

1. The after-hours call centre will take the customer call or the System Control Operator will notice on SCADA that a feeder has locked out, and contact the on-call lineperson in accordance with the schedule provided.

2. The Control Room will notify the On-call Operations Supervisor of the outage.

3. The On-call Operations Supervisor will liaise with the Control Room regarding the status of the outage. If the outage is more widespread and assistance is required to handle customer communications, the Customer Service Supervisor/Manager will be called to request staff report to the Fort Erie Service Centre if the After Hours Call Centre is unable to handle the call volumes.

6.0 Major Outage (after business hours, with no System Control Operator on duty) – Feeder Outage (additional crews required)

1. The after-hours call centre will take the customer call and contact the on-call lineperson in accordance with the schedule provided.

2. The on-call lineperson will notify the On-call Operations Supervisor of the outage. If the outage is more widespread and assistance is required to handle customer communications, the Customer Service Supervisor/Manager will be called to request staff report to the Fort Erie Service Centre if the After Hours Call Centre is unable to handle the call volumes.

Answering Service Protocol		
	Document No.:	BCP-03B-NR
	Page:	1 of 15
	Region:	All Regions
	Issued:	2019-09-01
	Issue No.:	2.0

Table of Contents

1.0 During working hours Message

Customers will hear this on CNP's line during normal working hours.

Thank you for calling Canadian Niagara Power. If you are calling about an outage or trouble call, please hang up and dial 1-844-501-9473...that's 1-844-901-WIRE. If you know the extension number of the person you are calling, please enter it at any time. This call may be recorded for regulatory and quality assurance purposes.

Please listen carefully to our list of options, so that your call can be correctly directed to the appropriate party.

To speak with a Customer Service representative, please press "1".

For Ontario-One-Call, to request an underground cable locate, please press "6".

For Energy Conservation Program Information, please press "7".

To access our company directory, to dial by name, please press "9".

To hear these options again, please press the "pound (#)" key.

Otherwise, please remain on the line to speak with a representative.

2.0 After Hours Message

Customers will hear this on CNP's line prior to being switched over to the Call Centre during after-hours.

> *Thank you for calling Canadian Niagara Power. Our regular office hours are 8:00am to 4:30pm, Monday through Friday. If you know the extension number of the person you are calling, please enter it now to leave a voicemail. To access our company directory, to dial by name, please press "9". If this is an emergency, please remain on the line to speak to a representative. Thank you.*

3.0 On-Call Lineman

See on-call schedule

4.0 Service Area for Canadian Niagara Power

All of Greater Fort Erie (including Stevensville, Ridgeway and Crystal Beach).
All of City of Port Colborne (including Sherkston).

5.0 Answering Service

The Answering Service CSRs will receive calls from Fortis ON LDC customers at all hours of the day, including statutory holidays.

Receive Call

A call comes through the IVR to PowerAssist agents.
Fortis ON's IVR will redirect the customer to the appropriate department. Customers calling to report a power outage will be redirected to a 1-800 number. All calls to the 1-800 number will come to Util-Assist's phone system infrastructure, and will be handled by PowerAssist.

Vanity Numbers Assigned to Fortis:
1-844-501-9473 (Fort Erie and Port Colborne)
1-844-601-9473 (EOP)
1-844-701-9473 (Cornwall)
1-844-901-9473 (Algoma)
Inventory 1: 1-844-403-9473 (TBD)
Inventory 2: 1-844-404-9473 (TBD)

All power related calls to the 1-800 number will come to Util-Assist. PowerAssist agents will recognize that Fortis ON customers are calling, and are to answer the phone appropriately. Answer the phone by saying: "PowerAssist, this is (insert name here) speaking." PowerAssist will then begin gathering information from the customer, and handle the call as per the utility specific requirements.

Police, Fire, or Ambulance

Please note when you receive a Police, Fire or Ambulance call for Fortis ON, you MUST take down the badge and occurrence number. These numbers should be recorded on any ticket created in the OMS / CIS for follow up.

Power Problem

Upon receiving a call regarding a power problem, PowerAssist agents will begin troubleshooting to determine the nature of the power problem.

The possible call types are:

- Power problem which can include problems associated with a customer's premise, or problems not associated with a customer's premise (i.e., location calls).
- Disconnect/Reconnect
- Customer Service

Location Call

Power related calls are logged into the OMS. For the purpose of call logging, there are effectively two types of calls. Power related calls specific to a premise are logged in the OMS with a premise reference (i.e., address). Calls that are not specific to a premise do not include reference to the premise and are referred to as location calls.

Troubleshoot

Investigate the issue of the customer's power problem.
Potential power related issues include: no power, partial power, flickering lights, lines down, tree on or near line, leaking transformer, shifted transformer, street lights, etc.
For Lines down, tree on lines, cable dig in, leaking transformer, shifted transformer & graffiti, a location call is created in OMS as the issue is not specific to an address.

No Power:

Gather the customer's address, phone number, and a brief description of the power issue. If there is no specific address for the electrical issue, it is considered a location call. You must gather the nearest intersection, or significant buildings nearby to locate the specific issue.

Example, "on Kennedy and Second Street across from the Tim Horton's there is a line down. A ticket is logged in OMS and a call is placed to control (during business hours). The issue is reported to control, and customer information and a description of the issue is relayed. After hours a call is logged in OMS and a crew is dispatched by PA CSRs.

Once the customer has indicated they have no power ask them the following questions;

1. Do your neighbors have power? (this will indicate if the outage is isolated to the customer's house or throughout the neighborhood)
2. Have you contacted an electrician?
3. Is the whole house out or just part?
4. Any loud bangs? Any accidents to report?
5. Did you check your fuses or breakers?
6. Did you try resetting your main breaker?

Partial Power:

Gather the customer's address, phone number, and a brief description of the power issue. If there is no specific address for the electrical issue, it is considered a location call. You must gather the nearest intersection, or significant buildings nearby to locate the specific issue. Example, "on Kennedy and Second Street across from the Tim Horton's there is a line down. A ticket is logged in OMS and a call is placed to control (during business hours). The issue is reported to control, and customer information and a description of the issue is relayed. After hours a call is logged in OMS and a crew is dispatched by PA CSRs.

Ask the customer the following questions;

1. Do your neighbors have power? (this will indicate if the outage is isolated to the customer's house or throughout the neighborhood)
2. Have you contacted an electrician?
3. Did you check your fuses or breakers?

Flickering Lights:

Gather the customer's address, phone number, and a brief description of the power issue. If there is no specific address for the electrical issue, it is considered a location call. You must gather the nearest intersection, or significant buildings nearby to locate the specific issue.

Example, "on Kennedy and Second Street across from the Tim Horton's there is a line down. A ticket is logged in OMS and a call is placed to control (during business hours). The issue is reported to control, and customer information and a description of the issue is relayed. After hours a call is logged in OMS and a crew is dispatched by PA CSRs.

Ask the customer the following questions;

1. Is the whole house flickering or part of the house?
2. Is your service line running through trees?
3. Do you notice this more on windy days or is it all the time?
4. How long has this been happening?

Lines Down:

Gather the customer's address, phone number, and a brief description of the power issue. If there is no specific address for the electrical issue, it is considered a location call. You must gather the nearest intersection, or significant buildings nearby to locate the specific issue. Example, "on Kennedy and Second Street across from the Tim Horton's there is a line down." A ticket is logged in OMS and a call is placed to control (during business hours). The issue is reported to control, and customer information and a description of the issue is relayed. After hours a call is logged in OMS and on call lineman is dispatched by PA CSRs.

Ask the customer the following questions;

1. Do the lines cross over the road?
2. Do you have power? Neighbors ? Are the street lights on?
3. Can you determine if the line is hydro or Bell or Cable?
4. Are the lines sparking?

Tree on/or near Lines:

Gather the customer's address, phone number, and a brief description of the power issue. If there is no specific address for the electrical issue, it is considered a location call. You must gather the nearest intersection, or significant buildings nearby to locate the specific issue. Example, "on Kennedy and Second Street across from the Tim Horton's there is a line down." The call is then logged under the closest possible address to the problem in order to provide accurate outage areas. Call control (during business hours) and report the issue and provide them with the customer's information and a description. After hours a call is logged in OMS and a crew is dispatched by PA CSRs. **NOTE:** This process is used even if the tree is on customer property or the tree is owned by the customer.

Ask the customer the following questions;

1. Is this tree on City/Town or customer's property?
2. Is the tree located near lines from pole to pole or pole to house?

Cable Dig-In (Locates):

For after hours locates please follow the refence points below:

If there is an emergency disconnect call after hours from Ontario One Call, please contact On-Call Supervisor and log call into OMS.

Leaking Transformer:

Gather the service address, phone number, and a brief description of the power issue. If there is no specific address for the electrical issue, it is considered a location call. You must gather the nearest intersection, or significant buildings nearby to locate the specific issue. Example, "on Kennedy and Second Street across from the Tim Horton's there is a line down." Log call in OMS then call control (during business hours) and report the issue and provide them with the customer's information and a description. After hours a call is logged in OMS and on-call staff is contacted to respond.

Shifted Transformer:

Gather the service address, phone number, and a brief description of the power issue. If there is no specific address for the electrical issue, it is considered a location call. You must gather the nearest intersection, or significant buildings nearby to locate the specific issue. Example, "on Kennedy and Second Street across from the Tim Horton's there is a line down." Record if the customer calling to report this issue is the one who damaged the transformer or if the customer knows who hit or damaged the transformer. This information can be used to recoup damages for repairing / replacing the shifted transformer. A ticket is logged in OMS and a call is placed to control (during business hours). The issue is reported to control, and customer information and a description of the issue is relayed. After hours a call is logged in OMS and a crew is dispatched by PA CSRs.

Streetlights:

Streetlight maintenance and repair is handled differently by the different LDCs.

CNP - All streetlight maintenance and repairs, PA CSRs will provide the customer with the phone number for the corresponding Municipality

Graffiti:

For calls from customers reporting graffiti on LDC property (e.g., transformer boxes, poles, etc.) a ticket is created and logged in OMS. A ticket is logged in OMS (during business hours) and a call is placed to control room if required. Customer information and a description of the issue is relayed. After hours a graffiti call should be managed by the On Call Supervisor

Log Call without Premise Reference

Log location calls in the OMS. (An example of a location call would be "at Main Street and Second Avenue there is a power line down in front of the bus terminal.").

There is no specific address to log, so you have to get the customer to explain precisely where it is. This ensures that utility crews will be able to find the power line and resolve the issue as efficiently as possible.

- Always get the customer's name and phone number in case control wants more information, or if the crews cannot find the issue.
- Call the control room to inform them about the power related issue at the location. (Example "Line is down at Main Street and Second Avenue, and appears to be live. Just north of the Swiss Chalet. Reported by Terry, his number is (705)-750-7505") Current process for location calls (by LDC):
- CNP - Location calls are logged as a work order in SAP and submitted to control. Control logs information in a trouble call in OMS

After-Hours Reconnects

If the nature of the call is not power related, it might be a disconnect/reconnect call or a customer service call.

There are not typically after-hours reconnects completed at FortisOntario LDCs.

If a call is received from a customer who has just moved into a home that has been disconnected, advise the customer to call back the next business day to make payment and schedule a reconnect. If customer becomes aggravated / call requires escalation the call can be transferred to on-call customer service supervisor and reference the applicable FortisOntario contact listing. Normally occurs next business day.

NOTE: PA CSRs will receive a list of disconnected customers via SFTP pick up daily @ 4:45 p.m. During business hours reconnects are arranged through customer service. After hours no reconnects are performed. Any urgent CNPI customer service calls or updates can be emailed to outage@cnpower.com or a phone call to the on-call customer service supervisor only if urgent.

Safety Line

Check-In Time Expired:

SafetyLine monitors the worker’s status to ensure that they check in before the expiration of the acknowledged time frame. If this occurs, then nothing further is done.

However, if a worker misses their check-in time, a SafetyLine representative will make an attempt to contact the worker to determine if everything is OK. If they reach the worker and all is well, the clock resets and the process continue with no further intervention.

If the worker cannot be contacted during the first attempt, the SafetyLine representative will wait 5 minutes, and make a second contact attempt. If that contact is successful, the process resumes again without further required action.

If there is still no contact with the worker, the SafetyLine representative will contact the after-hours call center and alert them of the status. The after-hours call center representative will contact the applicable On-Call Supervisor and advise them that a lone worker has not checked in. The On-Call Supervisor will follow company protocol from that point (trying to reach the worker and then calling 911 if necessary).

Reporting Emergency:

When a SafetyLine representative receives an emergency alert from a lone worker, they will make an attempt to confirm the emergency (if there is no further detail or contact with the alerting lone worker).

Whether or not the emergency is confirmed, the SafetyLine representative will contact 911 to report the emergency, and then call the after-hours call center and pass along the emergency alert.

The after-hours call center representative will contact the applicable CNP On-Call Supervisor and advise them that a lone worker has reported an emergency. The On-Call Supervisor will follow company protocol from that point.

Contact On-Call Supervisor

PA CSRs will receive a call from SafetyLine if a lone worker misses the agreed upon check-in time or if a lone worker reports an emergency. Once the PA CSR has been notified of either of these scenarios the PA CSR is to call the applicable On-Call Supervisor and advise them that a lone worker has not checked in or has reported an emergency.

Customer Service

Customer service related issues include things like billing, account information, setting up accounts, etc.

For the FortisOntario LDCs, these issues should be redirected to the Customer Service department, during business hours. If the call takes place during non-business hours, inform the customer to call back during business hours. Any urgent CNPI customer service calls or updates can be emailed to outage@cnpower.com or a phone call to the on-call customer service supervisor only if urgent.

6.0 Log Calls into the OMS

Call to Control Room Required

In some cases the PowerAssist agent may be required to contact the control room directly.

Log Calls into the OMS

OMS is capable of logging tickets via IVR initiated calls.
For Fortis ON LDCs, PowerAssist agents will manually log calls into the OMS. The IVR is not integrated with the OMS. PowerAssist agents will ensure to include the customer's name, address, best phone number, and a brief description of the issue in the ticket.

Dispatch Crew

The control room uses information from calls entered by PowerAssist agents to assist in their outage management process.

Contact Control Room

When you can ensure that there is an unknown power issue, call the control room. You do not have to call the control room for a known outage. If you receive additional information about an outage that may benefit the control room in resolving the issue, give them a call.

7.0 Twitter

PowerAssist Manages Twitter

PowerAssist manages outage related Tweets for Fortis ON utility customers. Outage related tweets will be managed by PA CSRs 24/7 after service starts.

Twitter Process

The standard Twitter process is as follows:

- Receive an outage email indicating how many people are affected by the outage.
- Confirm that outage meets threshold (100 customers or more must be part of an outage before a tweet is sent)
- Determine what ward the outage is in and the bounds of the outage.
- Using the Twitter templates, acknowledge the outage on twitter. Be cognizant of the emails you are receiving as they may obtain additional information that has to be added to update the outage on Twitter.
- If an update email is received any new information (i.e. reduced number of affected customers, new estimated time of restoration, etc.) should be tweeted out.
- Once the power outage is resolved, tweet a final update. For example "Power in the Royal Salisbury Way area has now been restored. Thanks for your patience!"

8.0 Key Account

Outage Includes Key Account

PowerAssist offers enhanced service to a subset of the utility's customers; the key accounts.

Key accounts may have a special phone number which brings them to the front of the queue in the Util-Assist phone system.

PowerAssist will conduct call backs for key accounts to update them as the status of the outage changes including a callback to inform them when an ETR is established, callbacks whenever the ETR changes, a callback when the outage is restored.
For the Fortis ON LDCs, this will be a phase 2 process.

9.0 Outage Management

Update as Required

As the management of outage progresses, updated information will become available and should be integrated into the process as appropriate (i.e., logged in OMS, passed to key accounts, tweeted, outage map updated, etc.).

Communicate Status Changes

It is assumed and expected that Control Room operators will update PowerAssist agents so that the information delivered by PowerAssist agents is as up-to-date and accurate as possible. For example, if the status of an outage changes, that information is valuable to PowerAssist agents.

PowerAssist agents can receive updates either via calls from the Control Room (through the "Backdoor" line that skips the queue (289-340-0632)) or via email at powerassist@util-assist.com (this email will be received by all PowerAssist agents regardless of which agents are on shift).

Outage affecting the whole city /town

If an outage is affecting the whole community the On-call Lineman will contact the after-hours service (PA) to have the Supervisor, Customer Service called in. If no answer, call in the Manager, Human Resources, Customer Service & Corporate Communications.

In no response, call again in 10 minutes. If no response after this, contact the on-call Operations Supervisor.

Once Customer Service staff is in place at the office, they will contact the after-hours service (PA) and begin taking the calls. The Customer Service staff will contact the after-hours service when power is restored and the calls will be passed back to the after-hours service.
Once you have spoken with the On-call Lineman about one call, any subsequent messages during the same time period can be logged in OMS without confirmation. If there is another

area experiencing a power outage or if you have important information to pass along, call directly

Alarms and Emergency's

In the event of alarms or emergencies at either the Fort Erie or Port Colborne buildings – call the Supervisor, Facilities Maintenance. If unavailable contact the On-Call Lineman.

If unable to reach the On-Call Lineman, contact the on-call Operations Supervisor.

Additional external contact numbers are listed under Emergency Contact list (Tab 1).

Feeder List and Maps Review		
	Document No.:	BCP-04A-NR
	Page:	1 of 1
	Region:	Niagara
	Issued:	2019-09-01
	Issue No.:	2.0

Refer to the ***Feeder Listing and Maps*** binders in the Supervisor, Customer Service office and with the Operations Supervisor.

At any given time, feeder information should be considered as an approximation, all numbers that have been provided are done so at current system configuration. A more accurate feeder count will be available with the introduction of the GIS system at all FortisOntario locations.

APPENDIX SEC-4

ROE Summary

Instructions

A distributor shall report, in the form and manner determined by the OEB, the Regulated Return on Equity (ROE) earned in the reporting year.

The reported ROE is to be calculated on the same basis as was used in the distributor's last Cost of Service (CoS).

The sign of the input cells are to be aligned with the sign of the accounts reported in RRR 2.1.7. Generally, revenue/gain items are to be entered as negative numbers and expense/loss items are to be entered as positive numbers.
Please read the RRR Filing Guide for the detailed guidance on the inputs of the form and appendices.

Click here for tips and examples (from RRR Filing Guide)

Information from the distributor's last CoS Decision and Order and the successfully submitted RRR 2.1.7 trial balance have been pre-populated in this form.
Please review each input for accuracy and contact Industry Relations Enquiry if you have any questions

CoS Decision and Order Info			**Data Source**
The CoS Decision and Order EB number for the ROE	- xx	EB-2016-0061	CoS Decision and Order (last CoS establishing the current reporting year's base rates)
Accounting standard used in CoS Decision and Order	- yy	MIFRS	CoS Decision and Order

Regulated Net Income			**Data Source**
Regulated net income (loss), as per RRR 2.1.7	- a	2,816,622.14	RRR 2.1.7 - USoA 3046 * (-1)
Adjustment items:			
Non-rate regulated items and other adjustments (Appendix 1)	- b	0.00	Appendix 1 cell (aq)
Unrealized (gains)/losses on interest rate swaps (Not applicable if recorded in Other Comprehensive Income)	- c		Please provide USoAs
Actuarial (gains)/losses on OPEB and/or Pensions not approved by the OEB	- d		
Non-recoverable donations (Appendix 2)	- e	-115.00	Appendix 2 cell (be)
Net interest/carrying charges from DVAs (Appendix 3)	- f	18,364.23	Appendix 3 cell (cc)
Interest adjustment for deemed debt (Appendix 4)	- g	-648,059.49	Appendix 4 cell (dg)
Adjusted regulated net income before tax adjustments	- h=a+b+c+d+e+f+g	2,186,811.88	
Add back:			
Future/deferred taxes expense	- i	56,663.00	RRR 2.1.7 - USoA 6115
Current income tax expense (Does not include future income tax)	- j	21,677.00	RRR 2.1.7 - USoA 6110
Deduct:			
Current income tax expense for regulated ROE purposes (Appendix 6)	- k	-96,010.84	Appendix 6 cell (fq)
Adjusted regulated net income	- l=h+i+j-k	2,361,162.72	

Deemed Equity			**Data Source**
Rate base:	- m	56,306,690.06	RRR 2.1.7 - Sum of USoA 4705-4751 inclusive
Cost of power	- n1	10,243,084.10	RRR 2.1.7 - Sum of USoA 4505-4640, 4805-5695, 6105, 6205, 6210, and 6225, then subtract ROE Summary cell (d) and subtract ROE Summary cell (e)
Operating expenses before any applicable adjustments			Please provide USoAs
Other Adjustments:	- n2		
Adjusted operating expenses	- n=n1-n2	10,243,084.10	
Total Cost of Power and Operating Expenses	- o=m+n	66,549,774.16	
Working capital allowance % as approved in the last CoS Decision and Order	- % p	7.50	CoS Decision and Order
Total working capital allowance ($)	- q=o*p	4,991,233.06	
PP&E			
Opening balance - regulated PP&E (NBV) (Appendix 5)	- r	92,096,128.94	Appendix 5 cell (ec)
Adjusted closing balance - regulated PP&E (NBV) (Appendix 5)	- s	100,087,423.07	Appendix 5 cell (el)
Average regulated PP&E	- t=(r+s)/2	96,091,776.00	
Total rate base	- u=q+t	101,083,009.06	
Regulated deemed short-term debt % and $	- % v 4.00	- v1=v*u 4,043,320.36	Cell (v) from CoS Decision and Order
Regulated deemed long-term debt % and $	- % w 56.00	- w1=w*u 56,606,485.07	Cell (w) from CoS Decision and Order
Regulated deemed equity % and $	- % x 40.00	- x1=x*u 40,433,203.62	Cell (x) from CoS Decision and order

Regulated Rate of Return on Deemed Equity (ROE)			**Data Source**
Achieved ROE %	- % y=l/x1	5.84	
Deemed ROE % from the distributor's last CoS Decision and Order	- % z	8.78	CoS Decision and Order
Difference - maximum deadband 3%	- % z1=y-z	-2.94	
ROE status for the year (Over-earning/Under-earning/Within 300 basis points deadband)	- z2 Within		If the distributor is in an over-earning position as indicated in cell (z2), please complete Appendices 7 & 8. If the distributor is in an under-earning position as indicated in cell (z2), please complete Appendices 9 & 10.