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**Frank D'Andrea**  
Vice President, Reliability Standards & Chief Regulatory Officer

BY EMAIL AND RESS

October 30, 2020

Ms. Christine E. Long  
Board Secretary  
Ontario Energy Board  
Suite 2700, 2300 Yonge Street  
P.O. Box 2319  
Toronto, ON M4P 1E4

Dear Ms. Long:

**EB-2020-0040 – Niagara Peninsula Energy Inc. 2021 Rate Application – Hydro One Networks Inc. Interrogatories to Applicant**

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As directed in the Ontario Energy Board's ("OEB") Procedural Order No. 1 issued October 13, 2020, Hydro One Networks Inc. ("Hydro One") is filing the enclosed Interrogatories for Niagara Peninsula Energy Inc.

An electronic copy of the interrogatories has been submitted using the Board's Regulatory Electronic Submission System.

Sincerely,

A handwritten signature in cursive script that reads "Frank D'Andrea".

Frank D'Andrea

**Hydro One Networks Inc. Interrogatories**  
**Niagara Peninsula Energy Inc. (NPEI)**  
**2021 Electricity Distribution Rates Application**  
**October 30, 2020**

**HONI 1**

Reference:

1. Exhibit 7, Section 7.1.4
  2. Filing Requirements for Electricity Distribution Rate Applications - 2020 Edition for 2021 Rate Applications, Chapter 2, Section 2.7.1.1, *Embedded Distributor Class*
- a) Please confirm that Hydro One Distribution has four connection points, with the following service addresses, that are embedded within NPEI's service territory and currently classified as NPEI General Service 50kW to 4,999kW customers:
- 1) Victoria Avenue
  - 2) Rockway PME
  - 3) Port Davidson Road
  - 4) Canboro Road (Wellandport PME)
- b) If part a) is confirmed, please provide the following as per the Filing Requirements (Reference #2):
- "Evidence supporting the continued appropriateness of the rates for the general service class for recovering the costs of providing low voltage distribution services to the embedded distributor(s)."*

**HONI 2**

- a) Hydro One Distribution notes that an email from NPEI dated July 30, 2020 has confirmed that Hydro One Distribution owns and maintains the retail meter assets used to serve Victoria Avenue and Rockway PME service addresses. Please discuss why it is appropriate that these service addresses pay distribution charges that include the costs of owning and maintaining retail meters.
- b) Hydro One Distribution notes that an email from NPEI dated July 30, 2020 has confirmed that Hydro One Distribution owns and maintains all distribution and retail meter assets used to serve Port Davidson Road and Canboro Road (Wellandport PME) service addresses. Please explain why it is appropriate that these two service addresses are subject to the same distribution charges as the other general service 50kW to 4,999kW customers.

**HONI 3:**

NPEI applies the “Total Loss Factor for Secondary Metered Customer < 5,000 kW” to calculate the energy and regulatory charges at all four embedded Hydro One Distribution connection points.

- a) Please confirm that all four embedded Hydro One Distribution service points are connected at 8.32kV.
- b) Please confirm whether NPEI considers 8.32kV as Primary voltage for its General Service 50-4,999kW rate class.
- c) If parts a) and b) are confirmed, please explain why it is appropriate to use the “Total Loss Factor for Secondary metered customers” to calculate energy and regulatory charges at all four embedded Hydro One Distribution connection points.