resilient LLP

January 14, 2021

VIA RESS

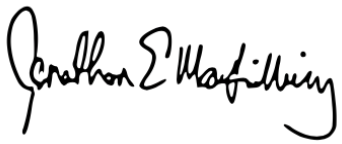
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4
Attention: Registrar

Dear Ms. Long:

Re: Burlington Hydro Inc. (BHI)
2021 Cost of Service Rates Application
Board File No.: EB-2020-0007

We are counsel to Distributed Resource Coalition (**DRC**). In accordance with Procedural Order No. 1, please find attached DRC's interrogatories to BHI in the above-noted proceeding.

Sincerely,



Jonathan McGillivray

c. Charles Keizer, Counsel, Torys LLP
Sally Blackwell, VP, Regulatory Compliance & Asset Management, BHI
Wilf Steimle, Electric Vehicle Society
Cara Clairman, Plug'n Drive

Encl.

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ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sched. B, as amended (the **Act**);

AND IN THE MATTER OF an Application by Burlington Hydro Inc. 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 May 1, 2021.

EB-2020-0007

INTERROGATORIES

OF

DISTRIBUTED RESOURCE COALITION (DRC)

January 14, 2021

Question: 1–DRC–1

Reference:
- Exhibit 1, Appendix B – BHI 2021 Business Plan

Preamble: Burlington Hydro Inc. (**BHI**) notes in its 2021 Business Plan that "Customers are showing a growing interest in distributed energy, and want more choice to self-generate renewable power" (p. 31).

a) Please explain the intended meaning, in BHI's view, of (i) distributed energy and (ii) self-generation of renewable power in the context of the above statement.

b) Please describe all steps BHI is taking in order to prepare for customers' growing interest and desire for more choice, as outlined in the above statement.

c) Please provide any and all analysis, reports, studies, presentations, data or other documentation with respect to past and forecast (2021-2025) distributed energy resource (**DER**) uptake in BHI's service territory.

d) Please provide BHI's assessment of the specific impacts of the growing customer interest in DERs and the associated increase in DER penetration in BHI's service territory on: (i) BHI's distribution system planning; (ii) load forecast; (iii) productivity; and (iv) OM&A costs.

e) Please provide any and all reports, studies, presentations, data or other documentation with respect to past and forecast (2021 to 2025) electric vehicle (**EV**) uptake in BHI's service territory.

f) Please provide BHI's assessment of the specific impacts of the growing customer interest in EVs and the associated increase in EV penetration in BHI's service territory on: (i) BHI's distribution system planning; (ii) load forecast; (iii) productivity; and (iv) OM&A costs.

Question: 1–DRC–2

Reference:
- Exhibit 1, Appendix H – BHI Community Report
- DSP, Appendix 1: 2021 Test Year Material Investment Summary Documents

Preamble: BHI notes that Burlington Electricity Services Inc. (**BESI**) "has offered managed [EV] charging solutions to both single detached homeowners and multi-unit residential condominium owners. In 2019, BESI's primary focus was to grow its program with the installation of Level 2 charging stations in condominium parking garages." BHI further notes that through this program, "discussions with condo developers have resulted in an approach that meets the needs of prospective suite owners who plan to own EVs" and that the "system manages energy flows that respond to the needs of the unit owners and the capacity limits of the building's electrical service" (Exhibit 1, Appendix H, p. 282).

Further, BHI indicates that it uses "200A cable as the minimum size for all residential service to accommodate future EV charging" (DSP, Appendix 1, p. 185).

a) Please indicate how many (and where applicable the number of MW) of each of the following types of customer connections BHI facilitated in its service territory over the 2016 to 2020 period:

(i) single residential unit EV charger connections;

(ii) commercial facility EV charger connections;

(iii) condo EV charger connections; and

(iv) renewable energy and back up generation, including the type of facility (solar roof top, solar thermal, wind, energy storage) and the customer breakdown for such facilities (residential, general service, commercial/industrial, and/or large industrial).

b) Please indicate how many of each of the following types of customer connections BHI anticipates in its service territory over the 2021 to 2025 period:

(i) single residential unit EV charger connections;

(ii) commercial facility EV charger connections; and

(iii) condo EV charger connections; and

(iv) renewable energy and back up generation, including the type of facility (solar roof top, solar thermal, wind, energy storage) and the customer breakdown for such facilities (residential, general service, commercial/industrial, and/or large industrial)

c) What effects, if any, does BHI anticipate that the growth of EV chargers that are anticipated to be installed in the BHI service territory during the 2021 to 2025 rate period will have on the BHI distribution system? How is BHI preparing for its forecast of EV charger installation in its service territory?

d) Have any BHI customers been prevented from or delayed in installing EV charges as a result of capacity constrains in BHI's distribution system? If so, how many customers have been prevented or delayed and for how long?

e) Has BHI considered offering special rates (including, for example, a special low overnight rate) to customers who are EV drivers? If so, please file any and all related analysis, reports, studies, presentations, data or other documentation.

Question: DSP–DRC–3

Reference:
- DSP, pp. 77 and 102

Preamble: BHI indicates that there "is a high potential for the development of renewable generation in BHI's service area" (DSP, p. 77). BHI also notes the varying suitability for the installation of DERs such as rooftop and ground mounted solar units in its service area.

BHI notes that it "provides information on the capability of a its distribution system to accommodate Renewable Energy Generation (**REG**), including a summary of its load and REG connection forecast by feeder/MS; and information identifying specific network locations where constraints are expected to emerge due to forecast changes in load and/or connected renewable generation capacity" (p. 102).

a) Please discuss BHI's expected or predicted renewable generation and DER uptake trends.

b) Please indicate whether BHI considers EVs to be DERs and discuss the related implications for BHI's distribution system and system capacity.

c) Please outline and provide examples of BHI's operational objectives relating to DER integration and what BHI expects will be required to accommodate EVs and DERs over the 2021-2025 period.

d) Please indicate the anticipated future customer electricity service requirements during the 2021-2025 rate period (with breakdown by customer type) and please provide any related analysis, reports, studies, presentations, data or other documentation with respect to behind-the-meter DER adoption in the BHI service area.

Question: DSP–DRC–4

Reference:
- DSP, Appendix 12: Customer Engagement Overview

Preamble: BHI engaged INNOVATIVE Research Group Inc. (**Innovative**) to undertake engagement activities with customers. Several emerging issues were identified including "responding to climate change, increased adoption of electric vehicles, and adapting to changing technology" (Appendix 1.0). Customers discussed "the changing demand for electricity that would come from an increase in electric vehicle adoption" (Appendix 1.0) and expressed concerned with respect to the additional demand for power on the grid and how this would affect their power consumption.

a) Please provide a copy of all written instructions provided by BHI to Innovative in relation to BHI's customer engagement for the DSP and the reports provided in Appendix 12.

b) Please describe any and all feedback related to EVs and DERs.

c) Please provide any and all notes from the customer engagement relating to EVs/DERs that are supplementary to the reports provided in BHI's DSP.

Question: 1–DRC–5

Reference:
- Exhibit 1, p. 27
- Exhibit 1, Appendix B – BHI 2021 Business Plan, p. 159

Preamble: BHI notes that it has helped the City of Burlington to implement the city's "Climate Action Plan" (p. 27) and the development of the city's "Climate Change Adaption Plan" (p. 159).

a) Please file copies of the City's "Climate Action Plan" and "Climate Change Adaptation Plan".

b) Please describe and provide examples of BHI's role in supporting the plans mentioned in (a).

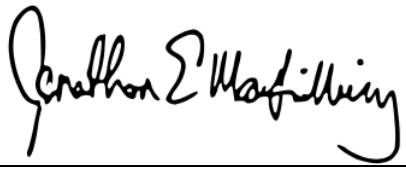
c) Please confirm whether or not BHI proposes to include BHI investments or expenditures in relation to the Plans in its capital plan or OM&A expenditures for the 2021 test year. If so, please provide all related evidentiary references.

d) Please outline BHI's emissions reduction targets for the 2021-2025 period, if any.

ALL OF WHICH IS RESPECTFULLY SUBMITTED THIS

14th day of January, 2021

Lisa (Elisabeth) DeMarco
Resilient LLP
Counsel for DRC



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