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April 1, 2021

VIA E-MAIL

Christine E. Long  
Registrar  
Ontario Energy Board  
Toronto, ON

Dear Ms. Long:

**Re: EB-2021-0074 – Kitchener-Wilmot Hydro Inc. (KWHI) 2021 RTSR Application  
Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)**

Please find attached the interrogatories of VECC in the above-noted proceeding.  
We have also directed a copy of the same to the Applicant.

Yours truly,

William Harper  
Consultant for VECC/PIAC

Email copy:  
Ms. Margaret Nanninga  
[mnanninga@kwhydro.ca](mailto:mnanninga@kwhydro.ca)

REQUESTOR NAME	VECC
INFORMATION REQUEST ROUND:	# 1
TO:	Kitchener-Wilmot Hydro Inc.
DATE:	April 1, 2021
CASE NO:	EB-2021-0074
APPLICATION NAME	2021 RTSR Application

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**1.0 Reference: Application, page 5, lines 5-6**

- a) Please provide a continuity schedule for Account 1854 starting with the opening balance for 2018 and ending with the closing balance for 2020 (exclusive of any amount required to settle under billings for the period June 8, 2015 to November 30, 2020).
- b) Please indicate how the forecast closing 2021 Account 1584 balance of \$3.6 M was determined.

**2.0 Reference: Application, page 7, lines 3-4**

**Preamble:** The Application states: “Finally, using current consumer volumes and revised current wholesale amounts, a new RTSR network rate is determined”.

- a) Please confirm that the “current consumer volumes” used were 2019 volumes (i.e., the same year as was used for the IESO network billing units).

**3.0 Reference: Application, page 4**

**Preamble:** The Application states:  
“KWHI has used the 2021 IRM Rate Generator (version 1.0), attached as a live excel file, to determine a revised RTSR Network Service Rate for this application.”  
However, the revised 2021 IRM Generator Model is not posted on the Board’s web-site.

- a) Please provide a revised version of the 2021 IRM Rate Generator model that incorporates the corrected data.

**4.0 Reference: Application, page 5**

- a) Does Kitchener-Wilmot pay Line Connection charges to the IESO?

- b) If yes, please explain why the “error” does not impact the Kitchener-Wilmot’s Retail Transmission Rate – Line and Transformation Connection Service Rate.

**5.0 Reference: Application, pages 7-8**

- a) Are the quoted bill impacts inclusive of the 2021 IRM rate adjustment (per EB-2020-0035) and the proposed 2021 RTSRs?

**6.0 Reference: Application, page 5**

**Preamble:** The application indicates that Kitchener-Wilmot Hydro will apply for a true up of historical years missed (2015 through 2020) and 2021 current charges during its 2022 IRM application.

- a) Do the IESO’s market rules place any limits on how far “back” market participants can be held responsible for under billing by the IESO?
- b) Based on Kitchener-Wilmot Hydro’s understanding, has the fact it’s been under billed for Network Charges over the 2015-2020 period led to:
  - i. An overall under collection by the IESO of the network revenues to be remitted to transmission owners – which would be the case if the UTRs for the period were based on load forecasts that had included the loads from the missing delivery point, or
  - ii. An appropriate collection by the IESO of network revenues for remittance to transmission owners but with a resulting underpayment by Kitchener-Wilmot and an overpayment by the balance of the transmission users during the period – which would be the case if the UTRs for the period were based on load forecasts that did not include the loads from the missing delivery point.

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