July 5, 2021

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

Dear Ms. Long,

RE: EB-2021-0039 Lakefront Utilities Inc. 2022 Cost of Service Application
Energy Probe Interrogatories

Attached are the interrogatories of Energy Probe Research Foundation (Energy Probe) in the EB-2021-0039 proceeding, the application by Lakefront Utilities Inc. to the Ontario Energy Board for the approval of its 2022 Cost of Service. As stated in Energy Probe's letter of intervention, Energy Probe's interrogatories are limited to Issue 3.4.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
Digitally signed by Tom Ladanyi
Date: 2021.07.05 15:33:27 -04'00'

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Margaret DeFazio (OEB Staff)
Dereck C. Paul (Lakefront Utilities Inc.)
Intervenors of Record

Lakefront Utilities 2022 Cost of Service Application

Energy Probe Interrogatories

July 5, 2021

3.4-EP-1
Reference: Exhibit 1, Appendix H, page 13 of 18, Q13

How many customers in the GS 50 to 2999 kW and GS 3000 to 4999 kW customer classes participated in the survey?

3.4-EP-2
Reference: Exhibit 1, Appendix I, Customer Engagement Workbook – Standby Charge, page 3
Preamble: "Furthermore, the proposed standby rate holds LUI's distribution revenue neutral from any future load displacement projects that would reduce the load assumed in LUI's load forecast."

a) Does the LUI 2022 load forecast include load displacement?

b) If the answer to (a) is no, please explain why not. If the answer to (a) is yes, please provide the forecast and the assumptions used to derive it.

3.4-EP-3
References: Exhibit 1, Appendix I, Customer Engagement Workbook – Standby Charge, page 3

Preamble: "If Lakefront Utilities Inc. were not able to be kept whole through the standby rate, other rate classes of customers would eventually experience rate increases to make up the difference, effectively subsidizing those customers with CHP/LDG projects."

When would customers in other rate classes experience rate increases if LUI were not able to be kept whole through the standby rate?

3.4-EP-4
References: Exhibit 1, Appendix I, Customer Engagement Workbook – Standby Charge, pages 5 and 6.

a) Are the financials on pages 5 and 6 two distinct examples or one example? Please explain.

b) In the table on page 6, the amount for "Standby Electricity" is shown as 250. What are the units for 250? Please explain how that amount was derived?

3.4-EP-5
Reference: Exhibit 1, Appendix I, Customer Engagement Workbook – Standby Charge, page 7

Preamble: "As noted, without a standby rate, the customer would realize annual savings of $279,688. If the customer were subject to a standby rate, the annual savings would be $269,324, a difference of $10,365 annually."

a) Would the customer in the example only be charged the Standby Charge when the customer is generating power for the customer's own use?

b) Is the $10,365 annual amount the amount that LUI would have to charge other ratepayers if the Standby Charge is not approved? Please explain your answer.

c) Please explain the mechanism and the timing of any charges to ratepayers related to the $10,365 annual amount.

3.4-EP-6
References: Exhibit 1, Appendix J, Standby Charge Letter to Customers, and Exhibit 7, page 18

a) Was the letter sent to all customers in the GS 50 to 2999 kW and GS 3000 to 4999 kW customer classes or only "affected" customers as stated in Exhibit 7, page 18?

b) How many LUI customers in the GS 50 to 2999 kW and GS 3000 to 4999 kW customer classes currently have Load Displacement Generation (LDG) or Load Displacement Storage (LDS)?

c) To the best of LUI knowledge, how many LUI customers in the GS 50 to 2999 kW and GS 3000 to 4999 kW customer classes are planning to instal LDG or LDS?

d) Apart from sending out the letter did LUI staff or representatives meet with the customers identified in the answers to (b) and (c) above to discuss the proposed standby charge? If the answer is no, please explain why not. If the answer is yes, please file a list of the customers that LUI staff met with.

e) Please file any written documents received by LUI from customers in the GS 50 to 2999 kW and GS 3000 to 4999 kW customer classes in response to the standby charge consultation and provide a summary of any verbal feedback.

3.4-EP-7
Reference: Exhibit 7, page 18

Preamble: "In the case where utility grade metering is not installed on the generators, distribution charges on the generator host facility's load account will be determined by multiplying the peak hourly delivered load as measured by the load account meter in kW by applicable variable charges for the rate class."

a) Please provide a definition of "utility grade metering"

b) Does LUI require that certain customers have utility grade metering?

c) Is utility grade meter owned by the customer or by LUI?

d) Considering that a customer may have reduced load for reasons other than LDG or LDS use, such as plant maintenance, how will LUI be able to identify the load for the determination of the Standby Charge?

3.4-EP-8
Reference: Exhibit 8, Rate Design, Standby Power Service Classification, pdf page 50 of 76.

Preamble: "Distribution Charges on the generator host facility's load account will be determined by multiplying the peak hourly delivered load as measured by the load account meter in kW by applicable variable charges for the rate class. Standby Charges will be determined by multiplying the peak coincident combined kW delivered by both the distribution system and the generator, less the peak hourly delivered load in kW of the host customer facility as measured by the generator host load account meter."

Please file a numerical example of the determination of a Standby Charge showing all calculations, units, and assumptions.