

September 7, 2021

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

Dear Ms Long:

EB-2021-0011– Canadian Niagara Power Inc. – 2022 Distribution Rates

Please find, attached, interrogatories on behalf of the Consumers Council of Canada for Canadian Niagara Power Inc. pursuant to the above-referenced proceeding.

Please feel free to contact me if you have questions.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC: All parties

INTERROGATORIES FOR CANADIAN NIAGARA POWER INC.

FROM THE CONSUMERS COUNCIL OF CANADA

2022 DISTRIBUTION RATES

RE: EB-2021-0011

EXHIBIT 1: ADMINISTRATIVE DOCUMENTS

CCC-1

Ex. 1

Please provide all materials presented to CNPI's Board of Directors related to this Application

CCC-2

Ex. 1/p. 13

For the residential class, please provide the total distribution increase net of any deferral and variance account recoveries.

CCC-3

Ex. 1/p. 16

CNPI's Conditions of Service were last updated in 2016. CNPI expects to publish a revised Conditions of Service before the end of 2021. Please provide a list of what is expected to change in the new Conditions of Service.

CCC-4

Ex. 1/p. 28

Please provide the Board approved and actual ROE for each year 2017-2020.

CCC-5

Ex. 1/p. 28

The evidence states that CNPI has been able to manage the impacts of the COVID-19 pandemic without material cost impacts and without seeking deferral account recovery for COVID-related costs. What were the COVID-19 impacts in 2020 and 2021?

CCC-6

Ex. 1/p. 29

Is CNPI using the same load forecast it used for its 2017 rates? If not, please explain the differences.

CCC-7

Ex. 1/p. 29

The evidence states that in preparing its cost forecasts for the Application CNPI has assumed an inflation rate of 2%. Please provide all documents provided to CNPI employees regarding the preparation of the budgets included in the Application.

CCC-8

Ex. 1/p. 44

What was the total cost of the UtilityPULSE work and how is that cost to be recovered? Please describe CNPI's role in the development of the UtilityPULSE work.

EXHIBIT 2: RATE BASE

CCC-9

Ex. 2/DSP p. 18

The evidence states that CNPI has begun exploring changes to design criteria and standards, with a focus on considering storm-hardened designs and/or additional redundancy in its capital investment planning. Storm-hardened designs include increasing the use of underground cable where practical, and adjusting the relative mechanical strength properties between wood poles and overhead conductors to reduce the extent of damage from falling trees. Has CNPI included these types of investments in its proposed capital budgets? If so, please identify where those investments are. If not why not? Does CNPI generally include storm hardening in its budgets?

CCC-10

Ex. 2/DSP/p. 19

Please specifically identify how CNPI adjusted its DSP following its customer engagement activities. What was the timing of the preparation of the DSP and the timing of CNPI's customer engagement.

EXHIBIT 4: OPERATING, MAINTENANCE AND ADMINISTRATION

CCC-11

Ex. 4/p. 17-18

Please explain the significant reduction in 2017 actual OM&A as compared to the 2017 Board-approved level.

CCC-12

Ex. 4/p. 38 and Appendix 4-C

CNPI has provided a Services Agreement dated September 15, 2020. How often is this document updated? If a more current version is available, please provide that version. How are the fees determined?

CCC-13

Ex. 4/pp. 29-31

Please provide a copy of the short-term incentive plan. For 2022 what are the budget assumptions for the STI plan? What were the STI plan payments in 2017-2020?

CCC-14

Ex. 4/p. 40

What is the annual rent paid to FortisOntario by CNPI for the Fort Erie service centre? When was the independent appraisal undertaken? Please provide evidence to demonstrate the rent continues to be reflective of market value.

EXHIBIT 9: DEFERRAL AND VARIANCE ACCOUNTS

CCC-15

Ex. 9/p. 13

What is CNPI's proposal regarding the CCA Changes Sub-Account?