



PUBLIC INTEREST ADVOCACY CENTRE
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October 14, 2021

VIA E-MAIL

Ms. Christine Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th floor
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: EB-2021-0018 Energy+ Inc. 2022 ACM Southworks Facility
Interrogatories of Vulnerable Energy Consumers Coalition (VECC)**

Attached please find the interrogatories of VECC in the above proceeding.

Yours truly,

John Lawford

Counsel for VECC

Copy to: Dan Molon, Energy+ Inc.

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EB-2021-0018

**Energy+ Inc.
Application for electricity distribution rates
effective January 1, 2022**

VECC Interrogatories October 14, 2021

VECC-1

Ref: Manager's Summary Page 20

Upon the OEB's Decision and Order, Energy+ immediately took measures to reduce the costs of the project through design changes and tendering strategies. Despite Management's best efforts, the \$6,500,000 target was not achieved due to unforeseen costs and the impact of the COVID-19 pandemic.

- a) Please provide a breakdown of the unforeseen costs.
- b) Please confirm the cost impact of the COVID-19 pandemic.
- c) Please provide the total cost impact of the unforeseen costs and COVID-19.

VECC-2

Ref: Manager's Summary Page 20 Table 9

The Maximum Eligible Incremental Capital is \$12,575,556.

Please provide the derivation of the \$12,575,556.

VECC-3

Ref: Manager's Summary Page 22

In 2020, Energy+ achieved a regulated rate of return of 7.89%, which does not exceed 300 basis points of its deemed return of 8.98% embedded in rates.

Please provide the estimated rate of return for 2021.

VECC-4

Ref 1: Manager's Summary Page 23 Table 12 – Summary of Southworks Cost Forecast

Ref 2: Manager's Summary Page 24 Table 13 – Project Cost Reductions

- a) Please map the project cost reduction items in Table 13 to the cost forecast items in Table 12.
- b) Please explain the cost items included in soft costs.

VECC-5

Ref 1: Manager's Summary Page 24 Table 14

Table 14 provides the Tender Cost Ranges.

Table 14 – Tender Cost Ranges

	Amount
Minimum	\$ 4,608,532
Average	\$ 5,809,294
Maximum	\$ 8,251,362

- a) Please provide the total number of bids and value of each bid.
- b) Please specify the costs in Table 12 and Table 16 included in the above tender.

VECC-6

Ref 2: Manager's Summary Page 25 Table 15

- a) Please identify the remaining costs to be tendered.
- b) Please provide Tendered costs, Construction Management & Consultant Fees, General Allowances and Single Source Provider costs from the estimates provided at the time of the last cost of service application.

VECC-7

Ref: Manager's Summary Page 27 Table 17

- a) Please update Table 17 for 2020 actuals and 2021 and 2022 forecasts.
- b) Please provide a detailed breakdown of the capital budget for 2022 (as per Appendix 2-AA).
- c) Please discuss whether and how re-prioritizing of capital projects in 2021 and 2022 has been considered.