

October 27, 2021

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

Dear Ms Long:

**EB-2021-0015 – Elexicon Energy Inc. – 2022 Rates – Incremental Capital Module – CCC Interrogatories**

Please find attached, Interrogatories for Elexicon Energy Inc. from the Consumers Council of Canada regarding its request for 2022 Incremental Capital Module funding. Please feel free to contact me if you have any questions.

Yours truly,

**Julie E. Girvan**

Julie E. Girvan

CC: All Parties

**INTERROGATORIES FOR ELEXICON ENERGY INC.**

**FROM THE CONSUMERS COUNCIL OF CANADA**

**RE: 2022 RATES – INCREMENTAL CAPITAL MODULE**

**EB-2021-0015**

**CCC-1**

When did Elexicon make the Decision to file its ICM Application for the two projects? Please file all materials presented to the Board of Directors related to this Application and specifically with respect to the ICM projects.

**CCC-2**

Please provide the Board approved and actual ROE for the years 2014-2018 for the Whitby and Veridian rate zones. Please provide the Board approved and actual ROE for the years 2019 and 2020 for the merged entity.

**CCC-3**

**Re: Ex. Appendix B - ICM**

With respect to the two projects please provide the following:

- a. The current expected in-service date;
- b. The proposed annual expenditures per year as per the DSP; and
- c. The actual expenditures incurred to date.

**CCC-4**

**Re: Ex. Appendix B/p. 1**

Of all of its proposed capital projects please explain why Elexicon is seeking CM treatment for the Bus Rapid Transit Project (BRT).

**CCC-5**

**Re: Ex. B-2 – Business Case/p. 9**

Please provide a complete list of all of the risks that could delay the in-service date of the Seaton TS Project. Please explain how Elexicon intends to mitigate those risks.

**CCC-6**

**Re: Ex. DSP – p. 184-187 – Table 5.4-12**

In the DSP Elexicon has set out a Variance Analysis Summary for System Access Expenditures. Please recast this Table to include Board Approved Amounts. Elexicon and its predecessor utilities have had a longstanding issue with significant underspending System Access Projects relative to planned spending. The contributing factors are largely delays and scope changes, often drive by external circumstances. Given this pattern, how can the OEB be assured that the BRT Project will be completed on time and on budget?

**CCC- 7**

**Re: Ex. DSP – p. 183 Table 5.4-11**

Elexicon is significantly ramping up its capital spending in 2022 relative to historical periods. Please explain the why Elexicon has not be able to better pace its investments as required by the RRFE. To what extent has Elexicon made efforts to reduce the capital spending in other areas in light of the need for the Seaton TS.