

July 11, 2022

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

Dear Ms Marconi:

EB-2022-0013 – Alectra Utilities Corporation – 2023 and 2024 Incremental Capital Module

Please find, attached, interrogatories for Alectra Utilities Corporation from the Consumers Council of Canada 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 FROM THE CONSUMERS COUNCIL OF CANADA

FOR ALECTRA UTILITIES CORPORATION

RE: 2023 AND 2024 INCREMENTAL CAPITAL MODULE

EB-2022-0013

CCC-1

Ex. 1/T1/S4/p. 3 and Ex. 3/T1/S1/p. 3

The evidence indicates that the OEB did not approve incremental capital funding in the 2020 rate application and that Alectra reduced its planned capital expenditures over the 2020-2024 period following the OEB's Decision:

- 1) Please set out the funding sought in the 2020 rate application and the revised 2020-2024 budget for cable renewal/refurbishment following the reductions;
- 2) Please describe, in detail, the process Alectra used to reduce its planned capital for the period 2020-2024;
- 3) What was Alectra's approved and actual ROE in 2020 and 2021?

CCC-2

Ex. 1/T1/S4/p. 5

Please set out the cable replacement and cable injection budgets for 2023 and 2024 as set out in the original DSP. Please set out the current budgeted amounts for cable replacement and cable injection investment in 2023 and 2024.

CCC-3

Ex. 1/T4/S4/p. 6

The evidence states that, "The average customer hours of interruption due to direct-buried cable and cable accessories increased by 10% over the 2019 to 2021 period, compared to the 2016 to 2018 period." Do these interruptions affect all customers or are some rate classes affected more? Please explain. Which customers are most affected by these outages?

CCC-4

Ex. 2/T1/S1/pp. 5-7 and pp. 13-15

Please explain why Alectra calculates the materiality threshold by Rate Zone and not for Alectra as a whole. Please explain why Alectra determines project-specific materiality by looking at the overall capital budget for Alectra in 2023 and 2024. If an electricity distributor does not have separate Rate Zones how is the ICM materiality threshold calculated?

CCC-5**Ex. 2/T1/S1/p. 9**

The evidence states, “Based on the engineering assessment, Alectra Utilities identified 20 high priority projects in the Enersource RZ and 32 high priority projects in the PowerStream RZ on the verge of cascading failures with an urgent need for renewal. Of these 52 projects, base funding was sufficient to address 24 cable renewal projects. Alectra Utilities is requesting CM funding for the next 28 high priority cable renewal projects in need of urgent cable renewal in these two RZs (17 projects in the PowerStream RZ and 11 projects in the Enersource RZ).”

- 1) Please explain how Alectra determines which projects are paid for through “base funding” and which projects are funded through ICM funding;
- 2) Please provide a complete list of all 28 projects and the budget for each project;
- 3) Please explain how Alectra defines a project that is eligible for ICM funding;
- 4) Alectra has identified 28 high priority cable renewal projects. Please explain the extent which Alectra has deferred other projects in light of the need to proceed with the 28 urgent projects.
- 5) Please indicate whether Alectra undertakes its capital planning process as a utility as a whole or whether capital planning is done for each rate zone.

CCC-6**Ex. 4/T1/S1/Attachment 12**

Please provide the Terms of Reference for the Guidehouse Assurance Review. Was this work subject to an RFP process? If not, why not?