



**Savoie  
Laporte**

**Savoie Laporte LLP**  
Bay Adelaide Centre West  
333 Bay Street, suite 900  
Toronto, ON M5H 2R2  
Canada

Myriam Seers  
myriam.seers@savoielaporte.com  
+1 416 886 7154  
Sebastian Melo  
sebastian.melo@savoielaporte.com

Sent by Email

August 5, 2022

Ontario Energy Board  
2300 Yonge Street  
27th Floor  
Toronto, ON M4P 1E4  
Attention: Registrar

Dear Ms. Marconi:

**Re: EB-2022-0028 – EPCOR Electricity Distribution Ontario Inc. 2023  
Cost of Service Application**

In accordance with procedural order No. 1 for the above-noted proceeding, please find enclosed SBUA's interrogatories to the applicant, EPCOR Electricity Distribution Ontario Inc.

Yours truly,

Sebastian Melo

cc. All parties in EB-2022-0028

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the Ontario Energy Board Act, 1998, S.O. 1998, c. 15, Schedule B, as amended;

**AND IN THE MATTER OF** an application by EPCOR Electricity Distribution Ontario Inc. for an Order or Orders approving raising its electricity distribution rates effective January 1, 2023, as well as an Order or Orders approving new deferral and variance accounts.

**EB-2022-0028**

**INTERROGATORIES  
OF THE  
SMALL BUSINESS UTILITY ALLIANCE**

**SBUA 1. Exhibit 1, page 38, section 1.5. Customer Engagement.**

Preamble:

In section 1.5 of Exhibit 1, EEDO described the customer engagement efforts it has undertaken since acquiring the utility in 2018. Red Head's 2021 customer satisfaction survey found that 57% of the general service business < 50 kW customer class agreed that the cost of their electricity bill has a major impact on the bottom line of their organization (compared to 37% of residential customers).

Question:

Given the critical impact of electricity bills on this customer class, please describe in detail the customer engagement efforts undertaken targeted to small businesses beyond the Red Head customer satisfaction surveys with respect to marketing, education and outreach, and provide supporting documentation.

**SBUA 2. Exhibit 1, Tab 2, Appendix A, page 58. Customer Satisfaction Surveys.**

Preamble:

Red Head's 2021 customer satisfaction survey shows that 75% of customers in the General service < 50 kW class are net satisfied with the services provided by EPCOR, compared to 85% of the Residential class.

Question:

Please provide EECO's views as to how to improve customer satisfaction levels amongst this group.

**SBUA 3. Exhibit 1, Tab 1, Page 39. Distribution Plan Customer Engagement.**

Preamble:

EECO refers to a survey conducted by Stone Olafson in Q4 2021

Question:

- a. Please provide a copy of the Stone Olafson report;
- b. How many of the 818 customers surveyed were commercial customers in the < 50 kW customer class?
- c. Was Stone Olafson asked to break down its findings to identify those related to this customer class specifically? If not, why not?

**SBUA 4. Exhibit 7, Tab 1, Schedule 1, Page 1 and 2. Cost Allocation Weighting Factors**

Preamble:

In the Weighting Factor for Services, Residential customers are given a weighting factor of 1.0 and General Service < 50 kW a weighting factor of 1.5. The explanation provided is that "[t]he cost of General Service < 50 kW installations is somewhat higher than Residential is they may require after hours attendances to mitigate against interruptions during normal business hours. Additional time is also required to ensure the demand data is programmed and monitored appropriately."

Question:

- a. Please provide a further explanation and all supporting documents and data to establish that services costs are proportionately 1.5 times higher for the General Service < 50 kW class than they are for the Residential class.

- b. If requests for after-hours installation are driving up costs, why does EEDO consider it appropriate to have those costs borne by the entire rate class, rather than by the customers who request that service?
- c. Please provide a further explanation and supporting documents and data to support the statement that “[a]dditional time is also required to ensure the demand data is programmed and monitored appropriately.”

**SBUA 5. Exhibit 7, Tab 1, Schedule 1, Page 4, Section 7.14. New Customer Class**

Preamble:

EEDO states that it is not proposing to include a new customer class.

Question:

Has EEDO considered whether to include a small business customer class, which would apply to small business customers who share many of the characteristics of residential customers? If not, what is EEDO’s position with respect to such a customer class?