



**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

November 28, 2022

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

Dear Ms. Marconi:

**Re: EB-2022-0018 – Application for raising its electricity distribution rates effective May 1, 2023, by Burlington Hydro Inc. – SBUA Interrogatories to Applicant**

We are counsel to the Small Business Utility Alliance (SBUA). Please find enclosed SBUA's interrogatories to the applicant in the above-noted proceeding.

Yours truly,

**Sebastian Melo**  
Savoie Laporte

cc. All parties in EB-2022-0018

**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 Burlington Hydro Inc. for an order approving the raise of its electricity rates effective May 1, 2023.

**EB-2022-0018**

**INTERROGATORIES  
OF THE  
SMALL BUSINESS UTILITY ALLIANCE**

SBUA 1. Exhibit 1, Page 33. Reference: Z-Factor Claim

According to the Report of the Board on 3rd Generation Incentive Regulation for Ontario's Electricity Distributors (July 15, 2008), the "Distributors are expected to report events to the Board promptly".

- a. Before September 2022, did Burlington Hydro Inc. report to the board the event occurred on May 21, 2022? If not, why?

SBUA 2. Exhibit 1, Page 33. Reference: Z-Factor Claim

- a. Which actions were taken by Burlington Hydro Inc. immediately after Environment Canada issued the warning on May 21, 2022? If any.
- b. Please provide a copy of the warning issued by Environment Canada on May 21, 2022, and any other received for Burlington Hydro Inc. in the previous days.

Please provide the documents and information on which the company bases its response.

SBUA 3. Exhibit 1, Page 34. Reference: Z-Factor Claim

According to your application, the service was restored to 90% of the affected customers by 9:43 pm the same day of the windstorm.

- a. When was restored the service to 10% of the remaining affected customers after the windstorm on May 21, 2022?
- b. Why the service to 10% of the remaining affected customers could not be restored at the same time as the other ones?
- c. What activities were necessary to perform to restore the service to 10% of the remaining affected customers?

Please provide the documents and information on which the company bases its response.

SBUA 4. Exhibit 1, Page 35. Reference: Z-Factor Claim

According to the Filing Requirements For Electricity Distribution Rate Applications (May 24, 2022), section 3.2.8.1., *“A distributor must submit evidence that the cost incurred meet the three eligibility criteria of causation, materiality, and prudence”*.

- a. Regarding the materiality and causation, please provide a clear explanation of the activities carried out on May 21, 2022, and the days after in order to restore and mitigate the damages caused by the powerful wind and thunderstorm. Please specify the activity and the amount.
- b. Regarding prudence, please provide a clear and detailed explanation of why Burlington Hydro Inc. considers the cost incurred were the *“most cost-effective option for rate payers”*.
- c. In relation to prudence, what alliances and mutual aid agreements to restore were used?

Please provide the documents and information on which the company bases its response.

SBUA 5. Exhibit 1, Page 36. Reference: Z-Factor Claim

According to the Filing Requirements For Electricity Distribution Rate Applications (May 24, 2022), section 3.2.8., *“Cost are to be recorded in Account 1572, Extraordinary Events Costs”*.

- a. Please confirm the costs associated with the May 21, 2022 event were recorded in Account 1572.

Please provide the documents and information on which the company bases its response.

SBUA 6. Exhibit 1, Page 33. Reference: Z-Factor Claim

According to the Filing Requirements For Electricity Distribution Rate Applications (May 24, 2022), section 3.2.8.2., *“As part of its claim, a distributor must outline how it intends to allocate the incremental revenue requirement to the various customer rate classes, the rationale for the selected approach and a discussion of the merits of alternative allocation methods”*.

- a. Did Burlington Hydro Inc. carry out a discussion of the merits of alternative allocation methods?
- b. If so, where the intervenors can find it?
- c. If not, could the company provide a discussion of the alternative allocation methods?

Please provide the documents and information on which the company bases its response.

SBUA 7. Exhibit 1, Page 33. Reference: Z-Factor Claim

- a. What preventive measures has Burlington Hydro Inc. adopted to act diligently and promptly in the event of this type of occurrence?
- b. Has Burlington Hydro Inc. identified what potential damages generally occurred in the event of this type of occurrence?

- c. What preventive measures has Burlington Hydro Inc. adopted to mitigate the potential damages that generally occurred in the event of this type of occurrence?

Please provide the documents and information on which the company bases its responses.

Submitted on behalf of the Small Business Utility Alliance this November 28, 2022.