



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

December 2, 2022

VIA E-MAIL

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

Dear Ms. Marconi:

**Re: EB-2022-0018 Burlington Hydro Inc. 2023 Z-factor
Interrogatories of VECC**

Please find enclosed the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

John Lawford

Counsel for VECC

Copy to: Adam Pappas, Director, Regulatory Affairs, Supply Chain & Capital Planning

EB-2022-0018

Burlington Hydro Inc. (BHI)

Application for electricity distribution rates and other charges effective May 1, 2023

VECC Interrogatories December 2, 2022

VECC-1

Ref: Manager's Summary, Page 37 Table 22

BHI's Z-Factor Event Costs are as follows:

Category	Operating \$	Capital \$	Total \$
Incremental Labour/Material/Vehicle Costs	\$47,568	\$128,373	\$175,941
3rd Party Contractors	\$109,135	\$127,402	\$236,537
Grid Smart City Partners	\$20,991	\$59,199	\$80,191
Total	\$177,695	\$314,975	\$492,669

- a) Please confirm overhead burdens in operating expenses are not included in the Z-factor claim.
- b) Please confirm regular labour is not included in the Z-factor claim.
- c) Please provide a breakdown of incremental labour costs in the same format as Staff IR-15 part (a) in EB-2018-0021.
 - a) Please provide a breakdown of material capital costs. Please provide a list of major asset quantities replaced due to the storm.
 - d) Please identify any relevant changes to BHI's 2018 Overtime Policy filed as Appendix C to OEB Staff Interrogatory Responses in EB-2018-0021.
 - e) Please provide a breakdown of 3rd party contractor operating and capital costs under the following categories: labour, materials, vehicles, accommodations and any other categories BHI deems relevant.
 - f) Please provide details of any premium amounts BHI paid to its 3rd party contractors.

- g) Please confirm when BHI's Z-factor costs will be audited.
- h) Please provide a summary of BHI's previous Z-factor storm claims and the amounts approved.

VECC-2

Ref: Manager's Summary, Page 37

The evidence states "BHI has several strategies for mitigating the impact of extreme weather events, however it could not have foreseen, planned or budgeted for the storm experienced on May 21. Therefore, the costs associated with this extreme weather event were not included in the rates approved in BHI's 2021 Cost of Service.

- a) Please summarize BHI's strategies to mitigate the impact of extreme weather events.
- b) Please provide BHI's s annual Emergency Maintenance amounts budgeted and included in rates, compared to actual expenditures for the years 2018 to 2021 and 2022 year-to-date.
- c) Please provide BHI's annual capital demand response/storm amounts budgeted and included in rates, compared to actual expenditures for the years 2018 to 2022 year-to-date.

VECC-3

A distributor is expected to supply the details of management's plans for addressing these events in support of the distributor's request for special cost recovery.

- a) Please provide the latest version of BHI's Emergency Operations Plan.
- b) Please confirm there were no deviations from BHI's Emergency Operations Plan.

VECC-4

With respect to BHI's vegetation management:

- a) Please provide BHI's vegetation management cycle.
- b) Please list the vegetation management areas and zones impacted by the storm.
- c) Please provide BHI's Vegetation Management Accomplishments (Planned compared to Actuals) in the same format as Table 9 in VECC-IR-14 part (c) for the years 2019 to 2022.
- d) Please provide BHI's annual vegetation management budget vs. actuals for each of the years 2018 to 2022.

e) Please provide the vegetation management amount approved in 2021 base rates.