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BLG
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Our File # 339583-000207

By electronic filing

June 17, 2015

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th floor
Toronto, ON M4P 1E4

Dear Ms. Walli

**Re: B2M Limited Partnership ("B2M LP")
Cost of Service Application**
Board File #: EB-2015-0026

Please find attached Interrogatories submitted on behalf of Canadian Manufacturers & Exporters ("CME") for B2M LP.

We have attempted to refrain from duplicating Interrogatories posed by Board Staff.

Yours very truly

Borden Ladner Gervais LLP



Peter C.P. Thompson, Q.C.

enclosure

c. Mike Penstone (B2M)
Erin Henderson (Hydro One)
D.H. Rogers and Anita Varjadic (Rogers Partners LLP)
Intervenors EB-2015-0026
Paul Clipsham and Ian Shaw

OTT01: 7058198: v1

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ONTARIO ENERGY BOARD

EB 2015-0026

OEB BOARD SECRETARY	
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Panel	EE
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IN THE MATTER OF the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15, Schedule B;

AND IN THE MATTER OF an Application by B2M Limited Partnership by its general partner, B2M GP Inc. for an order or orders approving rates for the transmission of electricity.

**INTERROGATORIES OF
CANADIAN MANUFACTURERS & EXPORTERS ("CME")
TO B2M LIMITED PARTNERSHIP ("B2M LP")**

1. Please confirm that all of the Bruce to Milton assets transferred to B2M LP and their owning and operating costs, including depreciation, return and taxes, were included within the ambit of the application made by Hydro One Transmission ("Tx") in EB-2014-0140 for its 2015 and 2016 Tx Rates Revenue Requirements and the Settlement Agreement therein dated September 16, 2014.
2. In section II of the materials filed by Hydro One Tx in EB-2014-0140 at page 6, there is a table showing the "Revenue Requirement" and "Rates Revenue Requirement" for Hydro One Tx for 2014, 2015 and 2016. Please revise that table to separate or allocate the amounts in each column and each line item between the Bruce to Milton assets transferred to B2M LP and the remaining assets held by Hydro One Tx.
3. Please provide schedules which will show how Hydro One Tx and B2M LP derived each of the components of the \$40,550,724 Interim 2015 Revenue Requirement for the Bruce to Milton assets to be transferred to the B2M LP shown on page 3 of the Board's December 11, 2014 Decision and Interim Order in EB-2014-0330.
4. Is the Interim 2015 Rates Revenue Requirement of \$40,550,724 a reallocation to the B2M LP of the Rate Revenue Requirement responsibility of the Bruce to Milton assets contained in the total Rates Revenue Requirement responsibility for 2015 of \$1,527.4M shown in the table at page 6 of section II of the evidence filed in EB-2014-0140? If not, then is the \$40,550,724 amount a reallocation to B2M LP of the portion of the 2014 Rates Revenue Requirement of \$1,446.4M shown in that table for which the Bruce to Milton assets are responsible?
5. B2M LP, in which Hydro One Tx has a 66% partnership interest, seeks approval for a 2015 Revenue Requirement of \$43.4M which is about \$2.8M or some 6.9% more than the \$40.6M for the Bruce to Milton assets currently being recovered in 2015 rates by Hydro One Tx. Please confirm that this request for relief is not compatible with the Board approved settlement in EB-2014-0140 covering the Bruce to Milton and other Hydro One Tx assets which limits 2015 Rates Revenue Requirement increases over 2014 Rates Revenue Requirement to 1.1%.
6. B2M LP seeks approval for a 2016 Rates Revenue Requirement of \$45M which is about \$4.4M or 10.8% more than the \$40.6M being recovered by Hydro One Tx in its Board approved 2015 rates. Please confirm that this request for relief is not compatible with the Board approved settlement in EB-2014-0140 covering the Bruce to Milton and other assets owned by Hydro One Tx in that the 2016 Rates Revenue Requirement is to be 1.7% over the 2015 Rates Revenue Requirement.
7. If the \$40.6M is currently being recovered under the auspices of the Board approved 2015 Interim Rate Revenue Requirement for B2M LP, then please confirm that, to adhere to the Board approved settlement in EB-2014-0410 covering the Bruce to Milton

- assets, the Rates Revenue Requirement for 2015 should be \$40.6M and, for 2016, a 1.7% increase to \$41.3M.
8. If the \$40.6M Board approved 2015 Interim Rate Revenue Requirement for B2M LP is the portion of the 2014 Rates Revenue Requirement related to Bruce to Milton assets, then please confirm that to adhere to the settlement, the 2015 Rates Revenue Requirement should be \$41.5M, being a 1.1% increase and, for 2016, should be \$43.9M, being a 1.7% increase over the 2015 Rates Revenue Requirement.
 9. Please confirm that the Board approved EB-2014-0140 Settlement Agreement covering the Bruce to Milton assets does not provide for an Unplanned Capital Spending Deferral Account ("UCSDA") and that the request for this new deferral account at Exhibit F1, Tab 1, Schedule 1, page 1 for 2015 and 2016 is incompatible with that settlement.
 10. Is the Tax Rate Change Account being proposed at Exhibit F1, Tab 1, Schedule 1, pages 2 and 3 identical to the Tax Rate Change Account in the Board approved EB-2014-0140 Settlement Agreement?
 11. Please confirm that the proposed 2015 Revenue Requirement Reconciliation Account, with an estimated debit balance of \$2.8M as described at Exhibit F1, Tab 1, Schedule 1, page 3, is incompatible with the Board approved EB-2014-0140 Settlement Agreement.
 12. Do each of the Annual Adjustment Mechanisms, being proposed at Exhibit A, Tab 4, Schedule 1, pages 2 and 3, operate under the auspices of the Board approved EB-2014-0140 Settlement Agreement for 2015 and 2016? If not, then please identify those which do not parallel the Annual Adjustment Mechanisms in that agreement.
 13. Please provide complete details of the \$4.3M of legal costs for SON and the \$1.8M of legal costs for Hydro One shown in Table 1 in Exhibit E1, Tab 1, Schedule 2, at page 2, including the nature of the services rendered, the time over which the services were provided and all invoices and supporting dockets.
 14. Please provide complete details of the Inergi LP Setup Costs of \$0.6M and Hydro One Initial Costs of \$1.0M shown in Table 1 of Exhibit E1, Tab 1, Schedule 2, at page 2.
 15. Please provide a detailed calculation of the Net Present Value of the customer benefit over the long-term referenced on page 4 of the Board's Decision and Order dated November 28, 2013, in EB-2013-0078, EB-2013-0079 and EB-2013-0080.
 16. The evidence at Exhibit G1, Tab 1, Schedule 1 states that all of the Revenue Requirement related to the Bruce to Milton assets and has been allocated to the Network pool. Please provide the following further information:
 - (a) Did the generators located at Bruce make any capital contributions to these assets? If so, in what amounts?
 - (b) Under the "beneficiary pays" principle, which the Board is reviewing in Phase 2 of the EB-2013-0421 proceeding, do the generators located at Bruce not have some cost responsibility for these assets which provide material benefits to their operations?