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BY EMAIL AND RESS

July 18, 2023

Ms. Nancy Marconi
Registrar
Ontario Energy Board
Suite 2700, 2300 Yonge Street
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Ms. Marconi,

EB-2023-0033 – InnPower Corporation – Application for electricity distribution rates and charges – Hydro One Networks Inc.'s Interrogatory Questions

As directed in the Ontario Energy Board's ("OEB") Procedural Order No. 1 issued June 23, 2023, Hydro One Networks Inc. ("Hydro One") is filing the enclosed Interrogatories for InnPower Corporation.

An electronic copy of this letter has been submitted using the Board's Regulatory Electronic Submission System.

Sincerely,

Frank D'Andrea

**InnPower Corporation – COS Application
Application for electricity distribution rates and other charges**

**Hydro One Networks Inc. Interrogatories
July 18, 2023**

1 **HONI-1:**

2
3 **Reference:**

- 4 1. Appendix 8-2-1 (A) 2024 OEB RTSR Workform (“RTSR Workform”)
5 2. Exhibit 8, Tab 2, Schedule 1, Retail Transmission Service Rates, Table 8-8: Proposed
6 RTSR Rates – Network and Connection
7 3. Exhibit 8, Tab 6, Schedule 1, Low Voltage Service Charges, Table 8-13: Allocation of
8 LV Charges based on Transmission Connection Revenues
9 4. Exhibit 1, Tab 1, Schedule 9, Host vs. Embedded Distributor, Table 1-29: Total Bill
10 Impacts
11

12 **Preamble:**

13 Tab 3 of the RTSR Workform is populated based on actual historical data from InnPower’s
14 most recent RRR. A specific Embedded Distributor class RTSR is not calculated for this
15 newly proposed rate class because of lack of historical data.
16

17 The proposed RTSRs for the General Service 50 to 4,999 kW class are applied to the
18 Embedded Distributor class throughout the application, specifically in the exhibits listed as
19 Reference 3 & 4, respectively.
20

21 **Interrogatory:**

- 22 a) Please confirm that the second occurrence labelled as “General Service 50 to 4,999
23 kW Service Classification”, in the RTSR Workform Tab 9 LV Rates row 42, represents
24 the LV rates calculation for the proposed Embedded Distributor class. If not, please
25 explain which LV rates calculated in Tab 9 will apply to the proposed Embedded
26 Distributor class.
27
28 b) Please confirm whether the consumption and demand for the proposed Embedded
29 Distributor class are included with the General Service 50 to 4,999 kW class in Tab 3
30 of the RTSR Workform. If not, please explain where consumption and demand for the
31 proposed Embedded Distributor class are included in Tab 3 of the RTSR Workform.
32
33 c) Tab 3 of the RTSR Workform separates the General Service 50 to 4,999 kW class
34 between its non-interval and interval customers.
35 i. Please confirm whether the consumption and demand values shown are
36 adjusted for non-interval/interval customers, as required.
37 ii. If yes, please confirm that the total Non-loss Adjusted Metered kW in Tab 3
38 RRR Data for the General Service 50 to 4,999 kW class is 314,755 kW

- 1 iii. If not, please adjust the consumption and demand values provided in Tab 3 of
2 the RTSR Workform, to account for non-interval/interval customers in the
3 General Service 50 to 4,999 kW class and provide an updated RTSR Workform
4 that includes the resulting updated proposed RTSRs and LV rates for all rate
5 classes.
6
- 7 d) The RTSR Workform and Table 8-8 do not separate the RTSR calculation for the
8 General Service 50 to 4,999 kW class and the proposed Embedded Distributor class.
9 It is expected that the resulting RTSRs will continue to be equal for the General Service
10 50 to 4,999 kW class and the proposed Embedded Distributor class.
11 i. Please explain why it is appropriate for the same RTSRs to be applied to the
12 General Service 50 to 4,999 kW class and the proposed Embedded Distributor
13 class.

14
15 **HONI-2:**

16
17 **Reference:**

- 18 1. Exhibit 8, Tab 8, Schedule 1, Loss Adjustment Factor
19 2. Appendix 8-8-1 (A) Chapter 2 Appendices 2-R Loss Factor

20
21 **Preamble:**

22 InnPower is proposing to update the total loss factor pertaining to secondary-metered
23 customers with demand less than 5,000 kW from 1.0604 to 1.0821.

24
25 **Interrogatory:**

- 26 a) Please confirm if InnPower is also requesting an update to the approved total loss
27 factor pertaining to primary-metered customers, which is currently 1.0498? If so,
28 please provide the proposed total loss factor pertaining to primary-metered customers
29 and the supporting calculations.

30
31 **HONI-3:**

32
33 **Reference:**

- 34 1. Exhibit 1, Tab 1, Schedule 9, Host vs. Embedded Distributor, Table 1-29: Total Bill
35 Impacts
36 2. Exhibit 8, Tab 11, Schedule 1, Bill Impact Information, Table 8-20: Rate Classes,
37 Pricing and Consumption / Demand
38 3. Exhibit 8, Tab 11, Schedule 1, Bill Impact Information, Table 8-29: Embedded
39 Distributor Non-RPP at 196 kW

1 **Preamble:**

2 Table 1-29 provides a detailed bill calculation and bill impacts for the proposed Embedded
3 Distributor class, and Table 8-20 presents the bill parameters for a typical customer in
4 each rate class including the proposed Embedded Distributor class. In both tables, the
5 total loss factor that pertains to secondary-metered customers is applied to the proposed
6 Embedded Distributor class, where Hydro One is the only customer.

7
8 **Interrogatory:**

9 Hydro One is a primary-metered customer, and currently billed accordingly. Please
10 confirm that InnPower will continue to apply the approved total loss factor that pertains to
11 primary-metered customers to bill Hydro One's embedded delivery point.

- 12 i. If not confirmed, please provide the total loss factor that will apply to Hydro
13 One's charges and explain why InnPower will not continue to apply the
14 approved total loss factor that pertains to primary-metered customers to Hydro
15 One.

16
17 **HONI-4:**

18
19 **Reference:**

20 4. Appendix 8-9-1 (A) 2024 Proposed Tariff of Rates and Charges

21
22 **Preamble:**

23 Appendix 8-9-1 (A) does not include the proposed tariff of rates and charges for the
24 proposed Embedded Distributor Class. The current total loss factors are also maintained,
25 and not updated to the proposed total loss factors.

26
27 **Interrogatory:**

28 Please update Appendix 8-9-1 (A) 2024 Proposed Tariff of Rates and Charges to include
29 the proposed tariff of rates and charges for the proposed Embedded Distributor Class,
30 and the proposed total loss factors.

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