



September 13, 2023

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

Re: Alectra Utilities Corporation – 2024 ICM Application  
AMPCO Interrogatories  
Board File No. EB-2023-0004

Dear Ms. Marconi:

Attached please find AMPCO's interrogatories in the above proceeding.

Please do not hesitate to contact me if you have any questions or require further information.

Best Regards,

A handwritten signature in blue ink, appearing to read 'Colin Anderson'.

Colin Anderson  
President

Copy to: Alectra Utilities Corporation

**EB-2023-0004**

**Alectra Utilities Corporation  
Application for changes to electricity distribution rates  
in the PowerStream and Enersource Rate Zones  
effective January 1, 2024**

**AMPCO Interrogatories September 13, 2023**

AMPCO-1

Ref: Exhibit 2 Tab 1 Schedule 1 p.10 Table 4

Please provide the Threshold Capital Expenditure Calculation for the PowerStream RZ using the the OEB-approved 2024 inflation factor.

AMPCO-2

Ref: Exhibit 2 Tab 1 Schedule 1 p. 19 Table 11

Please provide the Threshold Capital Expenditure Calculation for the Enersource RZ using the OEB-approved 2024 inflation factor.

AMPCO-3

Ref: EB-2022-0013 Decision and Oeder November 17, 2022 p. 9

At page 11, the Decision states:

“The OEB applied the 3.7% inflation factor to calculate the 2023 ICM materiality thresholds. The OEB will not change the inflationary input to the ICM calculations as outlined by OEB staff. OEB staff’s suggestion could be considered as part of a review of the OEB’s ICM policy but should not be considered in this proceeding given that it was only raised by OEB staff in its submission and calculations were not provided to the other parties to allow for a thorough consideration of this issue.”

In the absence of a review of the OEB’s ICM policy, please explain why Alectra believes it is appropriate to change the inflation calculation as an input to its 2024 ICM calculations.

AMPCO-4

Ref: EB-2022-0013 Decision and Order November 17, 2022 p. 14 Table 4

**Table 4: Enersource RZ Capital Expenditure Funding 2017 to 2023**

Annual Cable Renewal Spending (\$ millions)	Cable Renewal Funding Supported Through Distribution Rates								ICM Request
	Actual 2017	Actual 2018 <sup>31</sup>	Actual 2019	Actual 2020	Actual 2021	Actual & Budgeted 2022	Average 2017-2022	Budget 2023	Budget 2023
Cable Replacement	\$18.7	\$16.1	\$13.8	\$15.2	\$9.7	\$7.6	\$13.5	\$5.1	\$5.8
Cable Injection	N/A	N/A	\$0.0	\$0.0	\$0.0	\$1.7	\$0.4	\$1.6	\$2.9
Emerging Underground Projects	N/A	N/A	\$0.7	\$1.0	\$2.8	\$0.0	\$1.5	\$1.1	N/A
<b>Total</b>	\$18.7	\$16.1	\$14.5	\$16.2	\$12.6	\$9.3	\$14.6	\$7.8	\$8.7
<b>Total 2023 Cable Renewal Budget</b>								<b>\$16.5</b>	

Please update Table 4 to include: 2022 actuals, update the 2023 and 2024 budget for cable renewal funded through distribution rates, update the 2023 ICM Budget and add the ICM budget request for 2024.

AMPCO-5

Ref: EB-2022-0013 Decision and Order November 17, 2022 p. 14 Table 5

**Table 5: PowerStream RZ Capital Expenditure Funding 2017 to 2023**

Annual Cable Renewal Spending (\$ millions)	Cable Renewal Funding Supported Through Distribution Rates								ICM Request
	Actual 2017	Actual 2018	Actual 2019	Actual 2020	Actual 2021	Actual & Budgeted 2022	Average 2017-2022	Budget 2023	Budget 2023
Cable Replacement	\$8.3	\$9.9	\$6.7	\$11.9	\$6.3	\$9.5	\$8.8	\$7.4	\$10.7
Cable Injection	\$3.7	\$3.6	\$3.8	\$7.9	\$7.4	\$9.7	\$6.0	\$8.8	\$5.9
Emerging Underground Projects	\$0.0	\$0.0	\$1.9	\$1.9	\$3.0	\$2.3	\$2.3	\$1.4	N/A
<b>Total</b>	\$12.0	\$13.5	\$12.4	\$21.7	\$16.7	\$21.5	\$16.3	\$17.6	\$16.6
<b>Total 2023 Cable Renewal Budget</b>								<b>\$34.2</b>	

Please update Table 5 to include: 2022 actuals, update the 2023 and 2024 budget for cable renewal funded through distribution rates, update the 2023 ICM Budget and add the ICM budget request for 2024.

AMPCO-6

Ref: Exhibit 3 Tab 1 Schedule 2 p. 3 Figure 4

Please provide the number of Customer Hours of Interruption and number of Customer Interruptions for Cable XLPE and Accessories by rate zone for 2022.

#### AMPCO-7

Ref: Exhibit 3 Tab 1 Schedule 2 p. 5

From 2018 to 2022, the backlog of deteriorated underground cable has increased from 3,173 km (14% of the population) to 4,766 km (21% of the population).

- a) Please explain in detail how Alectra determined that an additional 1,593 km of underground cable is deteriorating and failing.
- b) Please provide a breakdown of the incremental 1,593 km of underground cable by rate zone.

#### AMPCO-8

Ref: Exhibit 3 Tab 1 Schedule 2 p.11 Table 21

- a) Please add the 2024 forecast to Table 21.
- b) Please provide the Table in part (a) on the basis of ICM funded cable renewal investments.

#### AMPCO-9

Ref: EB-2013-0002 AMPCO-13 (a)

- a) Please update Table 1 in part (a) to include 2022 actuals and the forecast for 2023 and 2024.
- b) Please provide Table 1 in part (a) on the basis of ICM funded cable renewal investments.

#### AMPCO-10

Exhibit 3 Tab 1 Schedule 2 p. 14

Alectra Utilities combined reliability statistics by grid against the 2020 ACA as part of an enhanced overlay methodology. Reliability heat maps illustrate the most recent (2016–2021) outages due to cable failures, including the location of recently (2016-2021) completed projects, planned projects in base rates and the proposed incremental cable renewal projects.

- a) Please provide copies of any ACAs completed beyond 2020.
- b) Please explain if Alectra combined reliability statistics by grid against the most recent ACA. If not, why not?
- c) Please discuss how the results of the overlay methodology impact the 2024 project priorities if the latest ACA and 2022 cable failures are used in the analysis.

AMPCO-11

Ref 2: Exhibit 3, Tab 1, Schedule 4 p. 2

Alectra indicates it responds to and remediates an average of 449 cable failures events each year.

- a) Please provide the calculation.
- b) Please provide the Cable & Accessories XLPE Outages in 2021 and 2022.

AMPCO-12

Ref: EB-2022-0013 AMPCO-1(a)

Alectra indicates the Health Index formula of XLPE cable segments has three inputs:

- a. XLPE type (tree retardant versus non-tree retardant)
  - b. Construction type (direct buried versus in-duct)
  - c. Age
- a) Please confirm it is primarily age, not asset condition or cable failure rates, is determining the km of XLPE cable that is in poor and very poor condition.
  - b) Please provide the weighing in the Health Index formula for age.
  - c) Please discuss Alectra's ability to include more data in the Health Index formula for XLPE cable.

AMPCO-13

Ref: EB-2022-0013 Decision and Order November 17, 2022 p. 19 Table 6

**Table 6: Material Changes from DSP 2020 to 2024**

<b>Summary of Material Changes \$ millions</b>	<b>2020 Actual</b>	<b>2021 Actual</b>	<b>2022 Budget</b>	<b>2023 Forecast</b>	<b>2024 Forecast</b>	<b>Total</b>
Underground Asset Renewal	\$0.4	(\$18.9)	(\$26.9)	(\$38.0)	(\$41.8)	(\$125.2)
Lines Capacity	(\$9.9)	(\$17.0)	(\$12.7)	(\$14.2)	(\$3.2)	(\$56.9)
Information Technology Systems	(\$1.3)	(\$4.4)	\$9.5	\$17.1	\$13.4	\$34.3
Other	(\$16.1)	\$22.1	\$1.1	\$1.6	(\$11.1)	(\$2.4)
Total Reduction before Proposed ICM	(\$26.9)	(\$18.2)	(\$29.0)	(\$33.5)	(\$42.7)	(\$150.2)
Proposed ICM Investments	\$0	\$0	\$0	\$25.4	\$26.9	\$52.3
<b>Total Net Reduction</b>	<b>(\$26.9)</b>	<b>(\$18.2)</b>	<b>(\$29.0)</b>	<b>(\$8.1)</b>	<b>(\$15.8)</b>	<b>(\$97.9)</b>

Please update Table 6 to include: 2022 actuals, 2023 and 2024 forecast.

AMPCO-14

Exhibit 3 Tab 1 Schedule 4 p. 8 Table 22

Please provide the ICM Project List separately for the PowerStream and Enersource Rate Zones.