Ontario Energy Board | Commission de l'énergie de l'Ontario

BY EMAIL

September 12, 2024

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

Dear Ms. Marconi:

Re: EB-2022-0325 Generic Hearing on Uniform Transmission Rates – Phase 2

In accordance with Procedural Order No. 4, please find attached the Ontario Energy Board staff interrogatories in the above proceeding. The intervenors have been copied on this filing.

Any questions relating to these interrogatories should be directed to Thomas Eminowicz at Thomas.Eminowicz@oeb.ca or 437-880-4363 ext. 363. The OEB's toll-free number is 1-888-632-6273.

Thank you,

Thomas Eminowicz
Digitally signed by Thomas Eminowicz
Date: 2024.09.12 14:00:05 -04'00'

Thomas Eminowicz
Senior Advisor, Generation & Transmission

Encl.

cc: all parties

M1-Staff-1
Ref 1: Hydro One Response to Clarifying Question AMPCO-1
Ref 2: Hydro One Response to Clarifying Question AMPCO-3
Ref 3: Hydro One Response to Clarifying Question AMPCO-4
Ref 4: Hydro One Response to Clarifying Question LDC-TG-8

Preamble:
Several of Hydro One's responses to Clarifying Questions relate to LDCs. OEB staff would like the LDC Transmission Group's view on some of the responses.

Question(s):

a) Of the LDCs represented by Exhibit M1, how many have been impacted by double peak billing in each of years 2020 to 2023? Please list the affected LDCs.
b) Of the LDCs represented by Exhibit M1, how many have both transmission and distribution delivery points to supply their load? Please list the LDCs.
c) For each of the years 2020 to 2023, please provide an estimate of the cost impact to the LDCs represented by the LDC Transmission Group. Please explain how these costs are derived, with a representative calculation.
d) Please confirm the number of customer enquiries made by LDCs represented by the LDC Transmission Group to Hydro One regarding double peak billing in each of the years 2020 to 2023.

M1-Staff-2
Ref 1: Exhibit M1, pdf page 2 of 20
Ref 2: Hydro One Response to Clarifying Question LDC-TG-1

Preamble:
With reference 1, the LDC Transmission Group states that double peak billing results in incremental revenue to transmitters. At reference 2, Hydro One states that double peak billing events are inherently included in the historical dataset that sets the UTRs and that there is no incremental revenue due to these events.

Question(s):

a) Please explain the basis of the statement that transmitters see incremental revenue from double peak billing events. Please resolve the apparent discrepancy between references 1 and 2.
b) Please explain the process by which retail transmission rates are determined for the represented LDCs. More particularly, and without limitation, please explain any distinctions among the represented LDCs. Please explain how double peak billing events are considered when the represented LDCs apply to set retail transmission rates. Are double peak billing events part of this historical data that support setting retail transmission rates? If they are not considered, why not?

M1-Staff-3
Ref 1: Exhibit M1

Preamble:
Several examples provide estimated impacts from double peak billing in terms of $ per customer. The LDC Transmission Group has stated that LDCs are not financially affected as these additional costs are passed through to the final customers, presumably through a deferral account. OEB staff presumes that the impact of the resultant rate rider may be material to the LDC customers. OEB staff requests that the LDC Transmission Group provide additional information for the evidentiary record with respect to the impact to their customers.

Question(s):

a) Please provide a representative calculation for the $ per customer impact.
b) Please confirm whether all LDC customer classes bear the impacts of double peak billing or if only some customer classes bear the impacts. If only some, please generally explain the nature of the difference. Please explain whether the impact is the same for all those customer classes that are affected. If different, please explain.
c) Please complete the following table, for each of the years 2020 to 2023, including an explanation of any assumptions, calculations, or any other information the LDC Transmission Group deems relevant. Please confirm whether the dollar impact is per month, per year, or some other time frame. Please provide the % impact relative to the total bill for that time period:

Annual Impact of Double Peak Billing for a Typical Residential Customer

	NOTL		ENWIN		HHHI		Milton Hydro	
	$	%	$	%	$	%	$	%
2020								
2021								
2022								
2023								

	KHC		WNP		Hearst Power		RHI	
	$	%	$	%	$	%	$	%
2020								
2021								
2022								
2023								

d) Please complete the following table, for each of the years 2020 to 2023, including an explanation of any assumptions and calculations, or any other information the LDC Transmission Group deems relevant. Please confirm whether the dollar impact is per month, per year, or some other time frame. Please provide the % impact relative to the total bill for that time period.

Annual Impact of Double Peak Billing for a Typical General Service Customer

	NOTL		ENWIN		HHHI		Milton Hydro	
	$	%	$	%	$	%	$	%
2020								
2021								
2022								
2023								

	KHC		WNP		Hearst Power		RHI	
	$	%	$	%	$	%	$	%
2020								
2021								
2022								
2023								

M1-Staff-4
Ref 1: Exhibit M1

Preamble:
OEB staff would like additional clarification regarding the LDC Transmission Group's evidence on connection points and delivery points. OEB staff would also like additional information from the LDC Transmission Group on meters and meter data in the context of transmission service charges as they relate to LDCs.

Question(s):

a) For those represented by the LDC Transmission Group, please confirm who owns and maintains the meters used for billing transmission charges for load served by a Transmitter. Please confirm the same for charges for load served when the alternate source is another, separate LDC, such as Hydro One Distribution.
b) Please confirm that LDCs have access to all data from these meters. If not, please explain.
c) Please confirm, in general for an LDC, that a transformer station can have more than one connection point. If not, please explain.
d) Please explain whether and how a connection point can have multiple delivery points.
e) Please explain whether and how a delivery point can have multiple meters.
f) When an LDC is charged more than one transmission service charge, is the same data used for all the applicable charges or are there distinct datasets for each charge? For example, at a delivery point that attracts all three of Network, Transformation Connection, and Line Connection charges, would there be individual meters for each charge or would one meter be used for all three, assuming there is only one meter for that single delivery point?
g) Halton TS is cited in more than one example. Please confirm that, according to Exhibit M1, Halton TS serves multiple customers. Please explain whether any delivery points are shared between customers / LDCs. For example, is it possible for two customers to use the same delivery point? Similarly, please explain whether any meters are shared between customers / LDCs.
h) Is it possible for Halton Hills Hydro Inc. to be served by Halton TS while it is not possible for Milton Hydro to be served by Halton TS? Please briefly explain. Are there recent instances where a transmission outage caused one LDC to be served from Halton TS while the other was not? Please explain. Similarly, please explain if this is possible under scenarios unrelated to transmission outages.

i) Please complete the following table to identify which transmission charges apply to the given LDC with respect the examples provided in Exhibit M1.

Transmission Charges that Apply before the Transmission Outage Short-Term Load Transfer

	Network Service	Transformation Connection	Line Connection
NOTL			
ENWIN			
HHHI			
Milton Hydro			
KHC			
WNP			
Hearst Power			
RHI			

j) Please complete the following table to identify which transmission charges apply to the given LDC with respect the examples provided in Exhibit M1

Transmission Charges that Apply after the Transmission Outage Short-Term Load Transfer

	Network Service	Transformation Connection	Line Connection
NOTL			
ENWIN			
HHHI			
Milton Hydro			
KHC			
WNP			
Hearst Power			
RHI			

k) If there are any instances where the types of charges that are incurred changes as a result of the short-term load transfer, please explain why.
l) Please confirm that in the examples of Exhibit M1, the load supplied to the LDCs is supplied from a Transmitter both before and after the short-term load transfer. Please also confirm that the IESO is the entity that issues the bills to the LDCs both before and after the short-term load transfer. If not, please explain.

M1-Staff-5
Ref 1: Exhibit M1

Preamble:
OEB staff would like to better understand load transfers in the context of LDC operations.

Question(s):

a) Please provide the LDC Transmission Group's definition of a load transfer in relation to transmission service. How is this type of load transfer different from load transfers for other reasons?
b) Are there any situations, unrelated to transmission outages, where an LDC that is normally served by multiple delivery points could have no load served from one of those delivery points? Please explain the different situations and their general expected frequency if they exist.
c) Please explain the different situations to perform load transfers that could change transmission service charges relative to what an LDC would consider "normal" operating conditions.
d) Please complete the following table. For the purpose of this table, OEB staff would like to distinguish between a load transfer and switching operations. For example, in Renfrew Hydro's September 2020 event of RHI's supply being fed through Cobden TS, instead of the normal Stewartville supply, this event would be one load transfer.

Load Transfers (LTs) among the LDCs represented by the LDC Transmission Group

	Due to Transmission Outages				All Load Transfers			
	# of LTs	Duration			# of LTs	Duration		
		Max	Min	Average		Max	Min	Average
2020								
2021								
2022								
2023								

M1-Staff-6
Ref 1: Milton Hydro Example from Exhibit M1, pdf page 11 of 20

Preamble:
The Milton Hydro example states:

> "On October 27, 2023, Hydro One identified a deficient piece of equipment in the Halton TS, which required a 48-hour total outage for replacement. Halton TS is the largest load serving TS in Milton Hydro's territory. A 48-hour outage at Halton TS required that all nine (9) feeders from Halton TS out of a total of seventeen (17) feeders between all stations was required to be offloaded to Tremaine TS, Palermo TS and Glenorchy TS."

Question(s):

a) Please explain what is meant by "all stations" in the reference. Does the referenced excerpt mean that Milton Hydro is fed by 17 feeders between all the stations that supply Milton Hydro or that there are a total of 17 feeders at Halton TS? How many Milton Hydro feeders were offloaded from Halton TS to the other three Transformer Stations?
b) With respect to Halton TS and Milton Hydro, how many delivery points does Milton Hydro have at Halton TS? If this number differs from the number of feeders, please explain.
c) Please confirm how many connection points Milton Hydro has at Halton TS.

M3-Staff-7
Ref 1: Exhibit M3, paragraph 6

Preamble:
OEB staff would like to ensure a common understanding with GCC regarding nomenclature in the context of GCC's filed evidence.

Question(s):

a) Please confirm that it is correct to refer to Sudbury INO as a "facility" that is owned and operated at GCC. Paragraph 6 also identifies GCC's "Timmins facility." In total, how many facilities does GCC own and operate in Ontario that are subject to transmission service charges, whether through either uniform transmission rates or retail transmission service rates?
b) Please confirm that the term "transmission connection" as used in paragraph 6 has the same meaning as delivery point. If not, please explain.
c) Please confirm that, for the purpose of billing for transmission service from the IESO, GCC is one customer who is billed for transmission service for multiple facilities.

M3-Staff-8
Ref 1: Exhibit M3, paragraphs 5 to 7

Preamble:
OEB staff would like to better understand the meters and delivery points that relate to Sudbury INO and billing for transmission services to this facility under normal circumstances.

Question(s):

a) Please identify the number of delivery points that are used to serve Sudbury INO from Strathcona TS. Please identify the number of meters for each Strathcona TS delivery point. If there is more than one meter related to Sudbury INO's load from Strathcona TS, does any totalization occur? If yes, please describe.
b) For each of Network Service, Line Connection, and Transformation Connection charges, please confirm which apply when the Sudbury INO load is served from Strathcona TS.
c) Please identify the "customer" that is billed for Sudbury INO's load served from Strathcona TS.
d) Please confirm whether any billing other than for transmission service occurs to either GCC or the customer in part c) based on load or energy from Strathcona TS. If such billing occurs, are the same meters used as those in part c) or are there distinct meters used between billing for transmission service and for other charges? Please explain.
e) Please confirm that GCC owns or is otherwise responsible for the meters used to measure Sudbury INO's load from Strathcona TS. If not, please explain.
f) Please confirm that in the scenario presented in Exhibit M3, when Sudbury INO's load is served from Larchwood TS, the load from Strathcona TS is nil and that any meter associated with the delivery points identified in part a) would have a reading of zero, or null. If not, please explain.
g) Please provide any additional information that GCC thinks would be relevant to assist OEB staff in understanding the meters and their data associated with billing for UTRs in relation to GCC's Sudbury INO load served from Strathcona TS.

M3-Staff-9
Ref 1: Exhibit M3 paragraphs 6 and 7
Ref 2: Exhibit M3, paragraph 16, part (a)
Ref 3: Exhibit M3, Attachment B

Preamble:
OEB staff would like to better understand the meters and delivery points that relate to Sudbury INO and billing for transmission services to this facility in the presented scenario during a load transfer to Larchwood TS.

Question(s):

a) Please identify the number of delivery points that are used to serve Sudbury INO from Larchwood TS. Please identify the number of meters for each Larchwood TS delivery point. If there is more than one meter related to Sudbury INO's load from Larchwood TS, does any totalization occur? If yes, please describe.
b) With respect to reference 2, please explain how the incremental charges that Hydro One Distribution passed through to GCC are derived and, if applicable, verified by GCC. For example, which meters or data are used?
c) With respect to reference 3, please describe the meters and data that are used for the non-transmission related charges. For example, are the same meters and the same data use for all charges? Or do separate meters provide the data for individual charges?
d) Please confirm that GCC owns or is otherwise responsible for the meters used to measure Sudbury INO's load from Larchwood TS. If not, please explain.
e) Please confirm that in the scenario presented in Exhibit M3, when Sudbury INO's load is served from Strathcona TS, the load from Larchwood TS to Sudbury INO is nil and that any meter associated with the answer to part a) would have a reading of zero, or null. If not, please explain.
f) Please provide any additional information that GCC thinks would be relevant to assist OEB staff in understanding the meters and their data associated with billing for retail transmission charges in relation to GCC's Sudbury INO load served from Larchwood TS.

M3-Staff-10
Ref 1: Exhibit M3 paragraphs 6 and 7
Ref 2: Hydro One response to Clarifying Question LDC-TG-08

Preamble:
OEB staff would like to better understand load transfers in the context of both GCC's and Sudbury INO's operations.

Question(s):

a) Please confirm whether the scenario described in Exhibit M3 illustrates the only reason to transfer Sudbury INO's load from Strathcona TS to Larchwood TS. If there are other reasons for such load transfers, please provide a general overview of the types, circumstances, and duration. Are there any other load transfers related to Sudbury INO that are not limited to Strathcona TS and Larchwood TS?
b) Do load transfers as described in Exhibit M3 also occur during unplanned transmission outages that affect the supply from Strathcona TS?
c) What is the typical number of load transfers in a year for Sudbury INO? If there is more than one reason for a load transfer identified in part a), please provide a reflective breakdown.
d) What is the typical duration of a load transfer at Sudbury INO, and what is the typical range in time for such load transfers? Similar to part c), please provide a breakdown if there are different types of load transfers.
e) Please confirm the number of customer enquiries GCC has made with Hydro One regarding double peak billing in the last five years.
f) Please confirm whether load transfers occur at GCC's other facility or facilities in Ontario. If yes, please confirm that generally, the information regarding Sudbury INO load transfers in Exhibit M3 and these interrogatories is representative of that or those facilities. If not, please provide additional information to understand the nature of load transfers for all other GCC facilities in Ontario.
g) Please provide an estimate of the additional cost to GCC, specifically for transmission related charges, due to transmission outage related load transfers from 2020 to 2023. Please explain the calculation of the estimate.

M3-Staff-11
Ref 1: Exhibit M3 – Appendix B

Preamble:
Appendix B provides an invoice from Hydro One Networks Inc. to GCC associated with a short-term load transfer to supply Sudbury INO from Larchwood TS. OEB staff would like to better understand the impact of the transmission outage as well as any potential impacts of alternative scenarios.

Question(s):

a) Please confirm that GCC agrees Appendix B shows the cost billed by Hydro One Networks Inc. for transmission service is approximately $72 thousand. If not, please correct OEB staff's understanding and provide calculations for the transmission-related charges associated with the supply from Larchwood TS.
b) Please confirm the actual duration of the short-term load transfer in this example.
c) Please confirm whether this scenario represents a load transfer that fully or only partially supplied Sudbury INO. If the supply was only partial, please explain.
d) Please explain the nature of planning for the load transfer. For example, was it a 2-day scheduled outage at inception or was there negotiation or coordination between Hydro One and GCC regarding the duration or timing or any other element of the outage?
e) Please estimate or characterize the lost revenue and impact to Sudbury INO had the supply from Larchwood TS been unavailable. How often does it occur that Larchwood TS is unable to fully supply Sudbury INO and Sudbury INO experiences a complete or partial loss of supply?

M3-Staff-12
Ref 1: Hydro One response to Clarifying Question SEC-02

Preamble:
Hydro One states that only Sub-Transmission LDC customers are served by more than one connection that would allow load to be transferred between connections.

Question(s):

a) Is GCC / Sudbury INO a Hydro One Distribution Sub-Transmission customer in the context of Exhibit M3 and Appendix B? If not, to which customer class does the Sudbury INO facility fall when its load is served by Larchwood TS?