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| REQUESTOR NAME: | VULNERABLE ENERGY CONSUMERS COALITION (VECC) |
| INFORMATION REQUEST ROUND NO: | #1 |
| TO: | GLENCORE CANADA CORPORATION (GCC) |
| DATE: | SEPTEMBER 12, 2024 |
| PROJECT NO: | EB-2022-0325 |
| APPLICATION NAME: | GENERIC HEARING ON UTRs – PHASE 2 |

1.0 Reference: Exhibit M3, page 2

Preamble: The Evidence states:
“When work is required on Hydro One’s transmission system in the area or GCC’s Strathcona CTS, GCC’s Sudbury INO electricity load is transferred on a short-term basis to the Larchwood TS. Under this short term load transfer (STLT) arrangement, the supply to GCC which is normally received at GCC’s Strathcona CTS at 115 kv and then stepped down to a lower voltage for use by Sudbury INO, is instead re-routed through Hydro One’s Larchwood TS where it is stepped down to 44 kv, and then received at GCC’s Strathcona CTS at 44 kv where it is further stepped down to a lower voltage for use by Sudbury INO. As a result of such STLTs GCC is billed as a Hydro One Distribution customer for the period during which GCC takes its electricity supply through the Larchwood TS. It should be noted that the local distribution system was not built to accommodate the GCC load transfer. Rather that load transfer is made available to GCC due to, and only to the extent of, excess local distribution capacity at the time of the transfer.”

- 1.1 Please confirm (or explain otherwise) that Hydro One and GCC seek to co-ordinate any planned work that would impact the ability of GCC’s Strathcona CTS to supply the Sudbury INO facilities such that it occurs when sufficient excess capacity is available through Hydro One’s distribution system.
- 1.2 Have there been instances where an unplanned outage on either Hydro One’s transmission system in the area or GCC’s Strathcona CTS have impacted the ability of GCC’s Strathcona CTS to supply the Sudbury INO facilities?
 - 1.2.1 If yes, in such instances has there always been sufficient excess capacity is available through Hydro One’s distribution system to serve Sudbury INO or have there been occasions where outages have occurred?

2.0 Reference: Exhibit M3, page 5

Preamble: The Evidence states:
“These duplicative charges have, in the past, added in the range of \$100,000 per STLT occurrence on average annually to GCC’s electricity bills, and multiples of that in years with multiple STLTs, as is anticipated by GCC in 2024 and 2025.”

2.1 Typically how many STLT occurrences have occurred annually (e.g., in the last five years)?

2.2 Does GCC expect the number of such occurrences to increase in 2024 and 2025 and, if so, why?

3.0 Reference: Exhibit M3, page 2

Preamble: The Evidence states:
“As a transmission connected customer, GCC is invoiced by, and settles directly with, the IESO. When these STLTs occur, GCC is, in addition, billed by Hydro One for STLT driven distribution costs. The result of these STLTs has been a duplication of transmission and Global Adjustment (GA) charges to GCC in the months in which the STLTs occur. GCC is charged these monthly demand-based charges once through its regular transmission account billed by the IESO, and a second time through Hydro One distribution charges for service during the STLT.

3.1 Is GCC aware of any other transmission-connected industrial customers in Ontario whose facilities are also connected to distribution system such instances of double-peak billing can and have occurred?

4.0 Reference: Exhibit M1, pdf page 20

Preamble: The Evidence submitted by the LDC Transmission Group proposes that the OEB address the issue of double-peak billing where a customer has both transmission connected and distribution connected delivery points as follows:
“The LDC Transmission Group also support this option (i.e., use of deferral account) though only for situations where the totalizing of meters will not work. Those LDCs that are not able to utilize the option of totalizing their meters can use this option. An example where this solution could be implemented would include where a customer has both transmission connected and distribution connected delivery points with switching between these points. Another example would be if a customer has distribution connected delivery points with more than one supplier such as Hydro One for one delivery point and another LDC for the other. As Hydro One has indicated, for this solution processes will need to be established and a methodology for calculating the double peak billing impact will need to be determined.
The LDC Transmission Group recognizes the challenges with implementing this solution as described by Hydro One in their background report. It also recognizes that this is outside the scope of this proceeding as defined by the OEB in Procedural Order #3

as will always involve distribution-connected customers. Due to this, the LDC Transmission Group recommends that a working group be established comprised of Hydro One, some interested LDCs (including some members of the LDC Transmission Group), OEB staff and any other participants the OEB consider to be appropriate. The working group would be tasked to seeing if they can develop a working approach for the deferral account.”

4.1 Does GCC support/agree with the approach proposed by the LDC Transmission Group?

4.1.1 If not, does GCC have an alternative approach it would propose for addressing the issue of double-peak billing where a customer has both transmission connected and distribution connected delivery points?