REQUESTOR NAME:	**VULNERABLE ENERGY CONSUMERS COALITION (VECC)**
INFORMATION REQUEST ROUND NO:	**#1**
TO:	**LDC TRANSMISSION GROUP**
DATE:	**SEPTEMBER 12, 2024**
PROJECT NO:	**EB-2022-0325**
APPLICATION NAME:	**GENERIC HEARING ON UTRs – PHASE 2**

1.0 Reference: Exhibit M1, pdf page 2

Preamble: The Evidence states:
"Not every LDC has issues with double peak billing, some have delivery point configurations that preclude the potential for double peak billing"

1.1 What types of delivery point configurations preclude the potential for double peak billing?

1.2 Do these types of delivery point configurations (i.e., ones that preclude double peak billing) provide the same level of service reliability as those that do include the potential for double billing?

2.0 Reference: Exhibit M1, pdf pages 2-3

Preamble: The Evidence states:
"The LDC Transmission Group recognizes that the OEB limited this hearing to transmission-connected customers but believes this solution is easily implemented for both situations and encourages the OEB to consider implementing it for distribution-connected customers with a single transmitter as well as part of the hearings findings." (emphasis added)

2.1 In the last sentence of the referenced quote should the sentence read "with a single distributor" as opposed to "with a single transmitter"?

3.0 Reference: Exhibit M1, pdf pages 2 and 4

Preamble: The Evidence states:
"The LDC Transmission Group is providing two solutions to this issue. The first is to allow the totalizing of delivery points. .....This would allow the OEB staff, Hydro One or other intervenors to raise objections if they did not believe totalizing would be appropriate for the particular situation." (pdf page 2)
And
"Double peak billing also occurs naturally with multiple delivery points as the peak at each delivery point will not be coincidental due to natural variations in demand across customers. Generally, the incremental cost from this variation is not significant though it is real." (pdf page 4)

3.1 If the OEB were to adopt the first solution would the degree to which the monthly peaks at the two (or more) delivery points are coincident be a relevant consideration in determining whether totalization was appropriate for a particular situation?

4.0 Reference: Exhibit M1, pdf page 6

Preamble: The Evidence states:
"In other situations, this cost minimizing action is not possible such as if there is not the capacity for the load (to) be carried by the alternative delivery points for the full month."

4.1 For electricity distribution utilities where this situation exists, does this mean that a single unplanned forced transmission outage occurring at certain times of the month/year could result in some/all of the distributors' customers being without power?

4.1.1 If yes, please indicate whether such a result is consistent with current system planning reliability criteria.

5.0 Reference: Exhibit M1, pdf page 7

Preamble: The Evidence states:
"NOTL Hydro is supplied by the Hydro One 115 kV Q11S and Q12S transmission lines through two transformer stations. York Station (NOTL MTS 1) is connected to Q12S and NOTL Station (NOTL MTS 2) is connected to Q11S.
Each station has the capacity to serve the entire NOTL Hydro load and each is 100% owned by NOTL Hydro. York Station has one 83 MVA transformer while NOTL Station has one 50 MVA transformer and one 41.7 MVA transformer. Each transformer is separately metered. For the purposes of transmission billing the two meters at NOTL Station are totalized."

5.1 Based on the most recent 12 months, what is NOTL Hydro's: i) current maximum system peak demand, ii) average monthly peak demand at each of its two transformer stations (excluding any hours were double billing is considered to have occurred) and iii) average monthly peak demand (assuming the loads at the two transformer stations were totalized)?

5.2 What is the capacity of each of Hydro One's 115 kV transmission lines (i.e., Q11S and Q12S) and was each purposely sized at the time they were constructed such they could serve the entire NOTL Hydro load?

5.3 Has NOTL Hydro requested and does Hydro One maintain sufficient available capacity on each of the Q11S and Q12S transmission lines such that the line is able to serve the entire NOTL Hydro load in the event of an unplanned forced outage of one of NOTL's transformers?

5.4 Please confirm that if all three transformers were located at the same site (i.e., the same transformer station), then the monthly meter readings at all three transformers would be totalized for purposes of transmission billing and there would be no double billing issue.

5.4.1 If not confirmed, please explain why.

5.4.2 If yes, why weren't NOTL three transformers all installed on the same site?

6.0 Reference: Exhibit M1, pdf page 8

Preamble: The Evidence states:
"ENWIN is currently supplied by Hydro One Networks Inc. ("Hydro One") transmission lines through nine (9) delivery points or transformer stations. ENWIN's service territory also has three (3) additional transformer stations which are dedicated for use by wholesale market participants. Of these transformer stations, six (6) are owned by Hydro One, five (5) are owned by ENWIN, and one (1) is owned by a customer.
ENWIN is the registered transmission customer at each of these delivery points and thus attracts monthly transmission charges billed by the Independent Electricity System Operator ("IESO"). The billing method for line and transformation connection transmission charges ("transformation charges") is based on a "per delivery point basis" and is defined as the non-coincident peak demand in any hour of the month at that delivery point."

6.1 Please confirm (or otherwise explain) that ENWIN incurs: i) Line Connection transmission charges for all nine delivery points and ii) Transformation Connection transmission charges for the 6 delivery points where the transformer stations are owned by Hydro One.

6.2 What is the transformation capability (i.e. number of transformers and size of each) at each of the nine transformer stations? (Note: For purposes of the response, if considered confidential, there is no need to disclose which station is customer-owned, i.e. they can simply be numbered 1 through 9)

6.3 Based on the most recent 12 months, what is ENWIN's: i) current maximum system peak demand, ii) average monthly peak demand at each of the nine transformer stations (excluding any hours were double billing is considered to have occurred) and iii) average monthly peak demand (assuming the loads at all nine transformer stations were totalized)? (Note: For purposes of the response, if considered confidential, there is no need to disclose which station is customer-owned, i.e. they can simply be numbered 1 through 9)

7.0 Reference: Exhibit M1, pdf page 9

Preamble: The Evidence states:
"Being cognizant of the available capacity of the delivery points serving its territory, ENWIN may also transfer load between delivery points to facilitate its own work, or to ensure continued service during an unplanned outage (e.g. loss of supply, weather event, etc.), where other delivery points have available capacity."

7.1 Please confirm (or otherwise explain) that ENWIN's ability to transfer load between delivery points to facilitate its own work, or to ensure continued

service during an unplanned outage (e.g. loss of supply, weather event, etc.) exists because: i) the capacity of the Hydro One's Line Connection facilities allows such load to be transferred between delivery points (i.e., overall capacity of all the Line Connection facilities significantly exceeds ENWIN's current/forecast system peak load) and ii) the capacity of the Hydro One-owned, ENWIN-owned and customer-owned transformer stations allows such load to be transferred between delivery points (i.e., the overall capacity of all these transformer stations significantly exceeds ENWIN's current/forecast system peak load).

7.2 At the time of their construction were the Hydro One-owned and ENWIN-owned transformer stations (and their associated Hydro One-owned line connections) purposefully sized so as to enable load to transferred between delivery points when necessary in order to facilitate Hydro One/ENWIN work on owned facilities and to ensure continued service during an unplanned outage (e.g. loss of supply, weather event, etc.)?

8.0 Reference: Exhibit M1, pdf page 10

Preamble: The Evidence states:
"HHHI is supplied by Hydro One at 230 kV T38B/T39B, H29/H30, and D6V/D7V transmission lines through four transformer stations. Fergus Station is connected D6V/D7V and supplies HHHI via a metering point on the M4 feeder (44 kV) shared with Hydro One, Alectra and Milton Hydro Distribution Inc. Halton TS is connected to the T38B and T39B and supplies HHHI via the M21, M29, and M30 feeders (27.6kV). The M21 Feeder is shared with Hydro One Dx, while the M29 and M30 feeders are dedicated to HHHI via a Tx agreement. Pleasant TS is connected H29/H30 and supplies HHHI via three dedicated express feeders, the M23, M25, and M28 (44 kV). Additionally, the HHHI owned Halton Hills MTS is connected to the T38B and T39B via the Halton Hills Generating Station Facility (HHGS CGS). The HH MTS facility is metered on each transformer at the 230 kV level.
Each feeder/transformer is separately metered. For the purposes of HONI transmission billing, the three meters/ feeders at the Pleasant Station are totalized."

8.1 Please confirm (or otherwise explain) that HHHI incurs: i) Line Connection transmission charges for all four delivery points and ii) Transformation Connection transmission charges for the 3 delivery points where the transformer stations are owned by Hydro One.

8.2 What is the transformation capability (i.e. number of transformers and size of each) at each of the four transformer stations?

8.3 Based on the most recent 12 months, what is HHHI's: i) current maximum system peak demand, ii) average monthly peak demand at each of the four transformer stations (excluding any hours were double billing is considered to have occurred) and iii) average monthly peak demand (assuming the loads at all four transformer stations were totalized)?

9.0 Reference: Exhibit M1, pdf pages 10-11

9.1 Has HHHI ever incurred double-billing charges due to the need to transfer load between transformer stations as a result of: i) an unplanned forced outage at one of the four transformer stations or ii) due to planned or unplanned outages on the HHHI feeders supplied by the transformer stations?

9.2 Please confirm (or otherwise explain) that HHHI's ability to transfer load between delivery points to facilitate Hydro One work, its own work, or to ensure continued service during an unplanned outage (e.g. loss of supply, weather event, etc.) exists because: i) the capacity of the Hydro One's Line Connection facilities allows such load to be transferred between delivery points (i.e., overall capacity of all the Line Connection facilities significantly exceeds HHHI's current/forecast system peak load) and ii) the capacity of the Hydro One-owned and HHHI-owned transformer stations allows such load to be transferred between delivery points (i.e., the overall capacity of all these transformer stations significantly exceeds HHHI's current/forecast system peak load).

9.3 At the time of their construction were the Hydro One-owned and HHHI-owned transformer stations (and their associated Hydro One-owned line connections) purposefully sized so as to enable load to transferred between delivery points when necessary in order to facilitate Hydro One/EHHHI work on owned facilities and to ensure continued service during an unplanned outage (e.g. loss of supply, weather event, etc.)?

10.0 Reference: Exhibit M-1, pdf page 11

Preamble: The Evidence states:
"Milton Hydro serves approximately 44,000 customers in the Town of Milton, Ontario. The Milton Hydro distribution system is supplied by a mix of direct connections to the IESO/Hydro One Networks Inc. (HONI) transmission system, and embedded connections to HONI and Oakville Hydro Electricity Distribution Inc. distribution systems.
Milton Hydro's 27.6kV distribution system is supplied from four Hydro One owned Transformer Stations (TS), (Halton TS, Tremaine TS, Palermo TS & Fergus TS) and one owned by Oakville Hydro (Glenorchy MTS). Transferring load between TSs causes double peak billing."

10.1 How is Milton Hydro currently charged for the use of the Glenorchy MTS owned by Oakville Hydro (i.e. what is the rate charged, how is it determined, is it part of the UTRs or part of Oakville Hydro's approved distribution rates and does Milton Hydro pay Oakville Hydro directly, as opposed to paying the IESO)?

10.1.1 Can this lead to double peak billing?

10.2 Please confirm (or otherwise explain) that Milton Hydro incurs both: i) Line Connection transmission and ii) Transformation Connection transmission charges for each of the 3 delivery points where the transformer stations are owned by Hydro One.

10.3 What is the transformation capability (i.e. number of transformers and size of each) at each of the four transformer stations?

10.4 Based on the most recent 12 months, with respect to deliveries to Milton Hydro from the four transformer stations, what was: i) the maximum coincident peak demand, ii) the average monthly peak demand at each of the four transformer stations (excluding any hours were double billing is considered to have occurred) and iii) average monthly peak demand (assuming the loads at all four transformer stations were totalized)?

11.0 Reference: Exhibit M1, pdf pages 11-13

Preamble: On the referenced pages the Evidence outlines a situation where the need for Hydro One to perform work on its equipment led to double peak billing.

11.1 Has Milton Hydro ever incurred double-billing charges due to the need to transfer load between transformer stations as a result of: i) an unplanned forced outage at one of the four transformer stations or ii) due to planned or unplanned outages on the HHHI feeders supplied by the transformer stations?

11.2 Please confirm (or otherwise explain) that Milton Hydro's ability to transfer load between delivery points to facilitate Hydro One work, its own work, or to ensure continued service during an unplanned outage (e.g. loss of supply, weather event, etc.) exists because: i) the capacity of the Hydro One's Line Connection facilities allows such load to be transferred between delivery points (i.e., overall capacity of all the Line Connection facilities significantly exceeds Milton Hydro's current/forecast coincident peak load on these facilities) and ii) the capacity of the Hydro One-owned and Oakville-owned transformer stations allows such load to be transferred between delivery points (i.e., the overall capacity of all these transformer stations significantly exceeds Milton Hydro's current/forecast coincident peak load for these facilities).

11.3 At the time of their construction were the Hydro One-owned and Oakville Hydro-owned transformer stations (and their associated Hydro One-owned line connections) purposefully sized so as to enable load to transferred between delivery points when necessary in order to facilitate Hydro One/Milton work on owned facilities and to ensure continued service during an unplanned outage (e.g. loss of supply, weather event, etc.)?

12.0 Reference: Exhibit M1, pdf page 14
EB-2022-0044, Exhibit 2, page 111 of 505

Preamble: The Evidence states:
"KHC has a contiguous distribution area that is supplied from Hydro One Frontenac station (115kV) and Hydro One Gardiner DESN1 station (230kV) via seven 44kV sub-transmission feeders. Each 44kV sub-transmission feeder is metered separately and used for the following settlements:

• Frontenac M2, M4, M5 Dedicated Feeders - the three feeder meters are totalized and monthly demand charges are billed at the applicable HONI Transmission rates.
• Gardiner DESN1 M7, M9, M12 Dedicated Feeders – the three feeder meters are totalized and monthly demand charges are billed at the applicable HONI Transmission and HONI Distribution rates
• Frontenac M3 Shared Feeder – monthly demand charges from this feeder meter are billed at the applicable HONI Transmission and HONI Distribution rates
• The seven meters above are totalized for IESO monthly wholesale energy purchase settlements."

12.1 What is the transformation capability (i.e. number of transformers and size of each) at each of the Hydro One Frontenac station (115kV) and Hydro One Gardiner DESN1 station (230kV)?

12.2 Please confirm (or explain otherwise) that KHC owns the M2, M4 and M5 Dedicated 44kV feeders and is billed is billed the UTRs for deliveries from Hydro One's Frontenac Station.

12.3 Please confirm (or explain otherwise) that Frontenac Feeder M3 and the Gardiner DESN1 M7, M9, M12 Dedicated Feeders are owned by Hydro One and KHC is billed using Hydro One's ST rates (including RTSRs) for the use of these facilities.

12.4 Based on the most recent 12 months, with respect to deliveries to KHC from these two stations, what was: i) the maximum coincident peak demand, ii) the average monthly peak demand for each of the three billing points (i.e., the totalized loads for a) Frontenac M2, M4, M5 Dedicated Feeders, b) Gardiner DESN1 M7, M9, M12 Dedicated Feeders and c) Frontenac M3 Shared Feeder - excluding any hours were double billing is considered to have occurred) and iii) average monthly peak demand (assuming the loads at all delivery points were totalized)?

12.5 At the time of their construction were the Hydro One-owned Frontenac station (115kV) and Gardiner DESN1 station purposefully sized so as to enable load to transferred between delivery points when necessary in order to facilitate Hydro One/KHC work on owned facilities and to ensure continued service during an unplanned outage (e.g. loss of supply, weather event, etc.)?

13.0 Reference: Exhibit M1, pdf page 15

Preamble: The Evidence states:
"Consequently, since December 2106, the Town of Mount Forest is fed by two HONI 44 kV lines – one from HONI's Hanover Transmission Station and the second from HONI's Palmerston Station.
The Town of Mount Forest's monthly peak demand is typically between 9,000 kW to 11,000 kW. With two 44 kV lines supplying Mount Forest, the combined kW demand of both lines therefore should be between 9,000 kW and 11,000 kW per month. Since the energization of a second 44 kV line, there have been 17 instances

where HONI has invoiced WNP a “double-peak demand charge”, that is the aggregated peak demand of the two PME metered supply points.”

13.1 What is the supply capability of each of the HONI 44 kV lines serving the Town of Mount Forest?

13.2 Out of the 17 instances, how many were due to: i) unplanned outages on Hydro One-owned facilities, ii) unplanned outages on WNP owned facilities, iii) planned outages for work on Hydro One-owned facilities and iv) planned outages for work on WNP facilities?

13.3 What was the rationale for construction of the second 44 kV line to supply the Town of Mount Forest (one of WNP’s service territories) and was the line purposefully sized so that it would be capable of supply the Town’s entire load?

14.0 Reference: Exhibit M1, pdf page 16

Preamble: The Evidence states:
“In April 2021, Hydro One made repairs at the Hearst TS and transferred the load from the M3 feeder onto the M2 feeder for a few days, temporarily increasing the demand on the M2 feeder to 10.65 MW, while bringing the demand on the M3 feeder to 0 kW during this time. Since the M2 feeder had a higher demand during the repairs, it was billed for 10.65 MW (approximately $50,000 more than usual) but the demand charges for the M1 and M3 feeders remained the same as usual at 8.4 MW, resulting in a total demand charged of 19 MW for April, instead of 13.5 MW which was the combined max demand at any point in time during that month.”

14.1 Please confirm (or explain otherwise) that for the month of April 2021 Hearst Power paid: i) the IESO Network, Transformation Connection and Line Connection UTRs based on 10.65 MW and ii) HONI RTSRS (for Network and Connection) based on 8.4 MWs.

14.2 At the time of their construction were the M1, M2 and M3 feeders purposefully sized so as to enable load to transferred between feeders when necessary in order to facilitate Hydro One/Hearst Power work on owned feeders and to ensure continued service during an unplanned outage (e.g. loss of supply, weather event, etc.)?

15.0 Reference: Exhibit M1, pdf page 17

Preamble: The Evidence states:
“RHI is fully embedded in Hydro One territory. RHI is fed normally through Stewartville but can also be fed from Cobden TS. Two recent examples are provided due to Hydro One outages at Stewartville in which they switched the RHI feed to Cobden TS.”

15.1 Does Hydro One purposefully ensure that sufficient (spare) capacity is always available at the Cobden TS in order to service RHI if there is an outage at Stewartville?