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BY EMAIL AND RESS

September 12, 2024

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

Dear Ms. Marconi,

EB-2022-0325 – Hydro One Networks Inc. – Phase 2 of the Generic Hearing on Uniform Transmission Rates – Interrogatory Questions

In accordance with Procedural Order No. 4 dated July 29, 2024, Hydro One Networks Inc. is submitting the following interrogatory questions to the LDC Transmission Group. All intervenors have been copied on this filing.

An electronic copy of these interrogatory questions has been filed using the Board's Regulatory Electronic Submission System.

Sincerely,

A handwritten signature in black ink that reads "Uri Akselrud".

Uri Akselrud

HONI IRS ON LDC TRANSMISSION GROUP EVIDENCE

HONI-1:

Reference:

LDC Transmission Group Evidence, Page 2 (Executive Summary)

Preamble:

The evidence refers to the fact that “there are a number of other LDCs who have double peak billing issues but who are not party of this evidence”.

Interrogatory:

- a) Can the LDC Transmission Group provide an estimate of how many other LDCs have experienced double peak billing issues?
- b) Can the LDC Transmission Group provide a sense of how many of these other LDCs are (i) transmission connected only, (ii) transmission and distribution connected, or (iii) distribution connected only?

HONI-2:

Reference:

LDC Transmission Group Evidence, Page 2 (Executive Summary)

Preamble:

The first solution proposed by the LDC Transmission Group is to allow totalizing of delivery points.

Interrogatory:

- a) Has the LDC Transmission Group had any discussion with IESO regarding the effort and costs associated with updating their billing and settlement systems to adopt this solution?

HONI-3:

Reference:

LDC Transmission Group Evidence, Pages 7-17

Preamble:

The evidence provides the experiences of the LDC Transmission Group members related to Issue #4.

1 **Interrogatory:**

- 2 a) To assist the OEB in better understanding the scope of the issue, can the LDC
3 Transmission Group please indicate how many of the double peak billing examples
4 provided by the LDC Transmission Group members on pages 7 to 17 relate to each of
5 the following situations:
6 i. Between only transmission connected delivery point
7 ii. Between transmission and distribution connected delivery points
8 iii. Between only distribution connected delivery points
9

10 **HONI-4:**

11
12 **Reference:**

13 LDC Transmission Group Evidence, Page 19
14

15 **Preamble:**

16 The LDC Transmission Group suggests that LDCs be allowed to apply to the OEB for
17 totalizing select delivery points as a solution to the double peak billing issue. They list a
18 number of parameters that could be used to determine whether totalizing of delivery points
19 should apply.
20

21 **Interrogatory:**

- 22 a) Is this a complete list of the parameters the LDC Transmission Group thinks could
23 apply?
24
25 b) If these parameters are not developed in advance of any applications to the OEB for
26 totalizing select delivery points, what does the LDC Transmission Group expect the
27 OEB to use in making consistent decisions across applications?
28
29 c) Does the LDC Transmission Group believe that this solution could also be applied to
30 other transmission-connected customers, not only LDCs?
31
32 d) Please list the disadvantages of the proposed solution of totalizing of select delivery
33 points.

1 **HONI-5:**

2
3 **Reference:**

4 LDC Transmission Group Evidence, Pages 18-20

5
6 **Preamble:**

7 The evidence provides recommended solutions to address double peak billing concerns
8 including totalizing of delivery.

9
10 **Interrogatory:**

- 11 a) What is the LDC Transmission Group's view on the timing for implementing an OEB
12 decision on any applications to totalize delivery points given that load forecast/charge
13 determinants for transmitters are approved at the time of their respective cost of
14 service applications for the duration of the application period (typically five years)? As
15 a result, any changes to the billing approach during the cost of service application
16 period (once load forecast/charge determinants are approved) would not align with
17 how the load forecast/charge determinants were approved and would result in an
18 inconsistency between how UTRs are set and how customers are charged, leading to
19 an under-recovery of the transmitter's approved revenue requirement.

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