

EB-2024-0026
Greater Sudbury Hydro Inc. (GSHI)
Application for electricity distribution rates
Beginning May 1, 2025

AMPCO Interrogatories January 10, 2024

1-AMPCO-1

Ref: 1-2-3 p.2

For the test year, GSHI is requesting a rate base that reflects the investments needed to maintain and improve system reliability while accommodating customer growth and modernizing the grid.

- a) Please confirm if the overall focus and goal of GSHI's 2025-2029 investment plan is to maintain or improve reliability.
- b) Which investments will improve system reliability?
- c) Please provide the investment goal over the 2020-2024 period with respect to reliability.

1-AMPCO-2

Ref: 1-2-3 p.5

GSHI indicates it has identified opportunities for cost savings: bundling projects; proactive asset management; voltage conversion.

- a) Has GSHI quantified the cost savings? If yes, please provide.
- b) Have the cost savings been reflected in the application?

1-AMPCO-3

Ref: 1-2-6 p.3

GSHI is proposing to determine fixed charges on a 30-day basis, rather than a monthly basis, to align with its billing system.

- a) Is GSHI aware of other LDC's who have implemented this proposal? If yes, please discuss.
- b) Why now?

1-AMPCO-4

Ref: 1-2-9 Attachment #1 p.32

Progressing through the next 5 years, GSHI forecasts efficiencies that, by 2028, will move us into Cohort II where the stretch factor would be 0.15% of the OEB inflation rate.

Please discuss and quantify the efficiencies that will move GSHI to Cohort II by 2028.

1-AMPCO-5

Ref: 1-2-9 Attachment #1 Appendix 1 p.6

The 2023 Customer Satisfaction Survey (2023 Report) with respect to Residential customers provides the customer satisfaction results with respect to effectively communicating with customers about planned electricity interruptions, and shows that for the period 2013 to 2023 the highest result is 68% in 2015 and the lowest result is 55% in 2020.

Please explain GSHI's plans over the 2025-2029 period to improve this result.

1-AMPCO-6

Ref: 1-2-9 Attachment #1 Appendix 1 p.21

The 2023 Customer Satisfaction Survey (2023 Report) with respect to Business customers provides the customer satisfaction results with respect to effectively communicating with customers about planned electricity interruptions, and shows that for the period 2013 to 2023 the highest result is 54% in 2023 and the lowest result is 40% in 2016.

Please explain GSHI's plans over the 2025-2029 period to improve this result.

1-AMPCO-7

Ref: 1-2-9 Attachment #1 Appendix 2

Please provide the Scorecard results for 2024.

2-AMPCO-8

Ref: Appendix 2-AA

Please provide Appendix 2-AA on the basis of in-service additions, add a column for 2024 actuals and provide an excel copy.

2-AMPCO-9

Ref: 2-9-1 p.2

GSHI indicates the DSP was authored by GSHI staff and reviewed by JULA PLT Consulting Inc.

a) Please provide the conclusions and recommendations provided by JULA PLT Consulting Inc. Please provide a copy of any final report prepared by JULA PLT.

b) Please explain how these recommendations were incorporated or not into the final DSP.

2-AMPCO-10

Ref: 2-9 Attachment #1 DSP p.14

The evidence states “Within the last several planning cycles, GSHI has taken a ‘business as usual’ approach to load and generation growth. In recent year, however, inquiries to our municipality from large power consumers have increased significantly.”

Please explain/provide further details on the nature of these inquiries.

2-AMPCO-11

Ref: 2-9 Attachment #1 DSP p.38

The level of investment in the next five years was decreased from the first proposal of \$65M to \$60M.

Please provide a breakdown of the projects/costs not included.

2-AMPCO-12

Ref: 2-9 Attachment #1 DSP p.52

Please add 2024 results to Table 9 System Reliability Metrics.

2-AMPCO-13

Ref: 2-9 Attachment #1 DSP p.58

Please explain why GSHI did not meet its target in 2021 related to O.Reg 22/04 Total Audit Findings.

2-AMPCO-14

Ref: 2-9 Attachment #1 DSP p.65-69

Please provide 2024 Historical SAIFI and SAIDI Data.

2-AMPCO-15

Ref: 2-9 Attachment #1 DSP p.71

Please provide a breakdown of SAIDI and SAIFI Equipment Failure by Equipment Type and include 2024 data.

2-AMPCO-16

Ref: 2-9 Attachment #1 DSP p.78

Please add 2024 actuals to Tables 19 and 20.

2-AMPCO-17

Ref: 2-9 Attachment #1 DSP p.126

Please provide the projects and expenditures in the 2025-2029 plan resulting from the Worst Performing Feeder Analysis.

2-AMPCO-18

Ref: 2-9 Attachment #1 DSP p.135

The 2022 Roof Asset Management Program was completed by independent consultant Garland Canada Inc.

Please provide the projects and expenditures in the investment plan resulting from this report.

2-AMPCO-19

Ref: 2-9 Attachment #1 DSP

Please provide the forecast costs savings over the 2025-2029 from the prospective capital investments.

2-AMPCO-20

Ref: 2-9 Attachment #1 DSP p.166

Please provide the last three columns of Table 49 to reflect the quantity of assets replaced over the 5-year period 2020-2024.

2-AMPCO-21

Ref: 2-9 Attachment #1 DSP p.191

Please add 2024 data to Table 55.

2-AMPCO-22

Ref: 2-9 Attachment #1 DSP p.223-229

With respect to the Lines budget, the forecast spend in 2025 is \$2,539,064.

- a) Please provide the System Renewal Lines spending for the years 2020 to 2024.
- b) With respect to the proposed rebuilds in 2025 on page 224, please confirm all projects are included in Appendix 2-AA for 2025.

2-AMPCO-23

Ref: 2-9 Attachment #1 DSP p.229-234

- a) Please provide the System Renewal Underground spending for the years 2020 to 2024.
- b) With respect to the proposed rebuilds in 2025 on page 230, please confirm all projects are included in Appendix 2-AA.
- c) Please provide the underground km to be replaced in 2025.
- d) Please provide the underground km to be replaced over the period 2026-2029.
- e) Please provide the underground km replaced over the period 2020-2024.

2-AMPCO-24

Ref: 2-9 Attachment #1 DSP p.240

With respect to the Utility Network Migration/GIS Modernization (General Plant) investment of \$500,000 in 2025 and \$380,000 in 2026, please explain why this work could not be paced over the 2025-2029 period.

2-AMPCO-25

Ref: 2-9 Attachment #1 DSP p.349

Please provide the project in Appendix 2-AA that includes this work (System Renewal – Major Repairs to Substations).

2-AMPCO-26

Ref: 2-9 Attachment #1 DSP p.362

- a) Please confirm the vehicle types replaced in 2024 and the corresponding cost.
- b) Please confirm the vehicles to be replaced in 2025.

2-AMPCO-27

Ref: 2-9 Attachment #1 DSP p.365

- a) Please detail the work undertaken in 2024 with respect to General Plant Building Costs.
- b) Please provide 2024 actuals.

2-AMPCO-28

Ref 1: 2-9 Attachment #1 DSP

In 2011, GSHI selected and engaged Kinectrics Inc. (Kinectrics) to perform the first ACA on GSHI's key distribution assets. Two more assessments, which covered the GSHI asset population to the end of 2015 and 2019 respectively, were conducted.

Ref 2: Appendix A p. 19

Please provide Table 3-1 Health Index Summary on the basis of quantity of assets in very poor, poor, fair, good and very good condition.

- a) Please provide the same table in Reference #2 with data from the 2019 ACA.
- b) Please provide a copy of the 2019 ACA.
- c) Please explain how GSHI has responded to the recommendations in the 2019 ACA.

2-AMPCO-29

Ref 1: 2-9 Attachment #1 DSP Appendix A p.29

With respect to Kinectrics' Conclusions and Recommendations, Kinectrics states "The data used in this assessment was from different locations within GSHI (e.g. numerous spreadsheets or PDF files). For more efficient record keeping and ease of future assessments, GSHI may wish to consider implementing Asset Performance Management (APM) platform that consolidates asset information and condition data (e.g. nameplate information, test results, operational information, inspection records, etc.) and that can perform required asset analytics, such as HI calculations and developing FFA plans.

Please provide GSHI's response to this recommendation.

2-AMPCO-30

Ref 1: 2-9 Attachment #1 DSP Appendix C

Please provide the vehicles replaced in each of the years 2020 to 2023.

4-AMPCO-31

Ref: 4-1-1 p.3

Table 3 provides the OMA Cost Drivers.

- a) Please provide a breakdown of all Contract Labour activities and costs in 2020 compared to 2025.
- b) Please provide a breakdown of all Vegetation Management Contract Labour activities and costs in 2020 compared to 2025.
- c) Please explain the increase in IT costs allocated from Affiliate in 2025.
- d) Please explain the increase in Insurance costs in 2025.

4-AMPCO-32

Ref: Ex. 4

- a) Please provide a schedule that sets out the vacancies by position by year for each of the years 2020-2024 and provide the associated vacancy dollars by year.
- b) Please provide the vacancy assumption for 2025.

4-AMPCO-33

4-2-1 p.6

Table 5 provides the overtime costs in OM&A.

Please provide Table 5 on the basis of total overtime costs.

4-AMPCO-34

Ref: 4-2-1 p.10 & Appendix 2-JC

- a) Please provide a breakdown of the 2025 Vegetation Management budget by activity.
- b) Please describe GHSI's 2025 Vegetation Management Strategy and cycle compared to 2020 and explain any changes.
- c) Please provide the vegetation management unit accomplishments for each of the years 2020 to 2024.
- d) Please provide the forecast vegetation management unit accomplishments for each of the years 2025 to 2029.

4-AMPCO-35

Ref: Appendix 2-K

Please provide the number of FTE's on the basis of Executive, Management, Union and Non-Union for each of the years 2020 to 2025.

4-AMPCO-36

Ref: 4-2-2 Appendix 2 p.5

Please provide the calculation for the Administrative Cost Ratio for GSHI.

4-AMPCO-37

Ref: 4-4-5 Attachment #1

With respect to Appendix 2-M, please provide a breakdown of 2020 actual Consultant costs compared to the consultant costs for the current application.