



**VIA RESS AND COURIER**

October 31, 2008

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: AMPCO Interrogatories  
2009 Electricity Distribution Rates: Canadian Niagara Power Inc. -Eastern  
Ontario, Fort Erie and Port Colborne  
Board File Nos. EB-2008-0222, EB-2008-0223 & EB-2008-0224**

In accordance with Procedural Order No. 1 dated October 10, 2008, attached please find AMPCO's interrogatories on the above application.

Please contact Shelley Grice at 647-880-9942 if you have any questions or require any further information.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Adam White".

Adam White  
President

Copies to: Mr. Douglas Bradbury, Canadian Niagara Power Inc.  
Intervenors

**Association of Major Power Consumers in Ontario**  
[www.ampco.org](http://www.ampco.org)

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**AMPCO Interrogatories  
2009 Electricity Distribution Rates**

**Canadian Niagara Power Inc.  
EB-2008-0222, EB-2008-0223 & EB-2008-0224**

**Interrogatory #1**

**Ref: Eastern Ontario** - Exhibit 8, Tab 1, Schedule 2, Page 2

The table titled Customer Class Revenue-to-Cost Ratios shows the proposed level of overcontribution from the GS< 50 kW (127.99%) and GS 50 to 4,999 kW (145.03%) customer classes both in revenue-to-cost ratios and real dollars. The other four classes are undercontributing with two out of the four classes below the ranges established by the Board.

The overcontribution by the GS 50 to 4,999 kW customer class is approximately \$6,155 annually. Over what period of time is CNPI planning to move its cost allocation ratios to 100% for all customer classes?

**Interrogatory #2**

**Ref: Fort Erie** - Exhibit 8, Tab 1, Schedule 2, Page 2

The table titled Customer Class Revenue-to-Cost Ratios shows the proposed level of overcontribution from the GS< 50 kW (129.81%) and GS>50 to 4,999 kW (151.44%) customer classes both in revenue-to-cost ratios and real dollars. The other four classes are undercontributing with three out of the four classes below the ranges established by the Board.

The overcontribution by the GS 50 to 4,999 kW customer class is approximately \$6,125 annually. Over what period of time is CNPI planning to move its cost allocation ratios to 100% for all customer classes?

**Interrogatory #3**

**Ref: Port Colborne** - Exhibit 8, Tab 1, Schedule 2, Page 3

The table titled Customer Class Revenue-to-Cost Ratios shows the proposed level of overcontribution (135.58%) from the GS>50 to 4,999 kW customer class both in revenue-to-cost ratios and real dollars. The other five classes are undercontributing with three out of the five classes below the ranges established by the Board.

The overcontribution by the GS 50 to 4,999 kW customer class is approximately \$5,457 annually. How and over what period of time is CNPI planning to move its cost allocation ratios to 100% for all customer classes?

#### Interrogatory #4

Please provide the data for the following tables:

##### CNPI - Eastern Ontario

Customer Size	# of Customers	Total Annual kWhs	Average Monthly Usage	Average Peak kW –monthly
50 kW – 250 kW				
251 kW– 500 kW				
501 kW – 1000 kW				
1001kW – 3000 kW				
3001 kW- 5000 kW				

##### CNPI – Fort Erie

Customer Size	# of Customers	Total Annual kWhs	Average Monthly Usage	Average Peak kW –monthly
50 kW – 250 kW				
251 kW– 500 kW				
501 kW – 1000 kW				
1001kW – 3000 kW				
3001 kW- 5000 kW				

##### CNPI – Port Colborne

Customer Size	# of Customers	Total Annual kWhs	Average Monthly Usage	Average Peak kW –monthly
50 kW – 250 kW				
251 kW– 500 kW				
501 kW – 1000 kW				
1001kW – 3000 kW				
3001 kW- 5000 kW				

#### Interrogatory #5

Please provide a copy of the 2006 cost allocation study submitted to the OEB or the URL link.