Greater Sudbury Hydro Inc

Pre-ADR Clarification Questions

February 8, 2025

Vulnerable Energy Consumers Coalition

EB-2024-0026

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VECC-49 IRR Load Forecast

Question:

REFERENCE: **VECC 13**
IRR Load Forecast, CDM Tab

a) The annual savings (2014-2025) from CDM programs implemented in 2014 as set out in the IRR Load Forecast Model's CDM Tab don't match the annual savings for CDM programs implemented in 2014 as reported in GSHI_IRR_2011-2014_Persistence_Report_Greater_Sudbury_Hydro_Inc..xlsx, 2014 Tab. Please reconcile.

b) With respect to the savings (2017-2025) from CDM programs implemented in 2017, the values for 2017 and 2020 in the Load Forecast Model's CDM Tab reconcile with the reports provided in VECC 13. However, the values for the other years do not appear in any of the referenced reports. Please provide the source/basis for these years' values.

c) With respect to the savings (2018-2025) from CDM programs implemented in 2018, the 2018 and 2020 values reported in "GSHI_IRR_Participation_and_Cost_Report_April_2019.xlsx" don't match those in the IRR Load Forecast Model's CDM Tab and the values for the other years do not appear in any of the referenced reports. Please reconcile the values used for 2018 and 2020 and provide the source/basis for the values used for other years.

d) With respect to the savings from CDM programs implemented in 2019 and 2020 used in the Load Forecast Model's CDM Tab, they do not appear in any of the referenced reports. Please provide the source/basis for the CDM savings values used.

Response:

a) Please see "GSHi CDM Reconciliation VECC-49" for a reconciliation of all CDM data in the load forecast with IESO reports and GSHi's post-CFF savings. The updated load forecast provided with pre-settlement responses includes the revised CDM figures calculated in this attachment (updated CDM figures are highlighted in the load forecast). Total savings of programs implemented in 2014 in "GSHI_IRR_2011-2014_Persistence_Report_Greater_Sudbury_Hydro_Inc..xlsx", tab '2014' match 2014 total CDM in the CDM tab of the Load Forecast. Please note that the '2014' tab includes adjustments to programs implemented in 2012 (2,562 kWh) and programs implemented in 2013 (595,241 kWh).

a) Savings in years other than 2017 and 2020 include estimated unverified 2017 savings in those years. Savings in 2018 and 2019 are calculated to provide equal loss in persistence in each year from 2017 to 2020. Savings in 2021 and later are calculated based on the typical loss in persistence of those programs in previous years where annual persistence data was provided by the IESO. Additionally, there are two corrections to 2017 savings in "GSHi CDM Reconciliation VECC-49". Persistence of unverified Coupon and Heating & Cooling programs was not included after 2020. Total savings for 2020 to 2024 were inadvertently entered for 2021 to 2025 so savings were offset by one year and the loss per persistence was delayed by one year.

b) The share of savings attributable to the GS>50 kW class was based on demand savings while the share of savings attributable to the GS<50 kW class was based on energy savings. As a result, GS>50 kW savings in 2018 was overstated by 86,295 kWh (Retrofit was overstated by 76,429kWh and Business Refrigeration was overstated by 9,866 kWh).

With these corrections total savings in 2018 and 2020 match savings reported in the April 2019 Participation & Cost Report. Savings in years other than 2018 and 2020 include estimated unverified 2018 savings in those years. Savings in 2019 was calculated as the midpoint between 2018 and 2020 savings. Savings in 2021 and later are calculated based on the typical loss in persistence of those programs in previous years where annual persistence data was provided by the IESO.

c) Savings in 2019 is the sum of the amount in the 2019 Participaction & Cost Report and Post-CFF savings calculated in "GSHI_2022_IRM_Updated_List Post Termination Projects_LRAM_2020 claim_20211111_REDACTED", which was filed in GSHi's 2022 IRM application (EB-2021-0026) and used in GSHi's LRAMVA workform. A copy of this file is included as tab 'Post-CFF Savings' in "GSHi CDM Reconciliation VECC-49". Savings in 2020 are from the same source, however, the share of savings attributed to the GS>50 kW class was based on demand savings while the share of savings attributable to the GS<50 kW class was based on energy savings. As a result, GS>50 kW savings in 2020 was understated by 320,442 kWh.

VECC-50 IRR Load Forecast Model

Question:

REFERENCE: IRR Load Forecast Model, Normalized Annual Summary Tab
IRR Load Forecast Model, CDM Adjustment Tab

PREAMBLE: The CDM savings included in the Residential, G<50 and GS>50 customer class forecasts for 2025 from 2024 CDM programs consist of: i) the savings included in the Cumulative Persisting CDM per the Normalized Annual Summary Tab and ii) the savings determined for the CDM adjustment per the CDM Adjustment Tab.

a) The Cumulative Persisting CDM savings forecasted for 2025 include 50% of the annualized savings from 2024 programs. The CDM adjustment includes 58% of the annualized savings from 2024 programs. This results in an overstatement of the impact of 2024 programs for each of the three customer classes. Please reconcile.

Response:

a) The cumulative persistence of CDM programs from 2014 to 2024 persisting to 2025 has been revised in the 'CDM' tab of the updated load forecast provided with pre-settlement responses. The adjustment of 2024 savings has been revised from 50% to 58%.

VECC-51 IRR Application Load Forecast

Question:

REFERENCE: Application Load Forecast, Total Additional Loads Tab
IRR Load Forecast, Total Additional Loads Tab

a) The additional kWhs attributable to EVs is the same in both the Application and the IRR Load Forecasts, even though the IRR Load Forecast has been updated to include actual loads through to November 2024 (as opposed to December 2023). Please reconcile.

b) Please explain why the additional Residential Heating Load is higher in the IRR Load Forecast when IRR Load Forecast has been updated to include actual loads through to November 2024 (as opposed to December 2023).

Response:

a) An adjustment is made to the EV forecast in the updated load forecast provided with pre-settlement responses so incremental consumption in 2024 is limited to December 2024. This adjustment is made by multiplying incremental kWh in 'Total Additional Loads" by 1/12.

b) The Residential heating load increased as a result of higher 2024 customer counts than forecast, which increased the forecast in 2025 customers from 43,422 to 43,485. An adjustment to account for the addition of 2024 actual data has been made to the updated load forecast provided with pre-settlement responses by including only forecast 2024 December incremental heating load.

VECC-52 Pole Counts Ref: Staff 53 b) & VECC 39 a)

Question:

REFERENCE: **Staff 53 b)**
VECC 39 a)

a) The "Full Pole Counts" in VECC 39 a) do not match those in Staff 53 b). Please reconcile.

b) With respect to VECC 39 a), explain the difference between "Full" and "Service" Poles and why the later attracts a lower rate.

Response:

a) The response to VECC-39 was prepared using figures from GSHi's initial 2024 budget in error, whereas the response to Staff-53 was based on updated pole counts. To ensure consistency, the table requested in VECC-39 has been revised below to reflect the updated amounts. Additionally, the 2024 actuals in Appendix 2-H have been updated accordingly, resulting in an increase of $13,966.

Year	# of Full Poles	Rate	# of Service Poles	Rate	# of Hydro One Poles	Rate	Prior year adjustments	Total
2020	23,614	44.50	636	22.25	104	87.90	25,106	1,099,221
2021	22,972	44.50	822	22.25	104	89.25	8,032	1,057,858
2022	23,735	34.76	730	17.38	108	90.60	29,637	877,138
2023	23,611	36.05	825	18.02	107	90.60	4,192	879,929
2024	24,098	37.78	729	18.89	107	90.60	10,843	944,740
2025	24,098	39.14	729	19.57	107	90.60	2	967,158

b) A 'Full' pole is a "Joint Use Pole" that its Owner has granted a Licensee approval to affix its attachments.

A ‘Service’ pole, also known as a ‘Clearance’ pole, is a Joint Use Pole owned by the Owner and used by the Licensee solely to establish and maintain vertical clearance for its Service Drops.

Under the terms of the 'Agreement for Licensed Attachment' between GSHi and various telecommunications entities, the attachment fee for a 'Service' pole is half that for a 'Full' pole. Smaller attachments (Service Drops) are typically short-term, while 'Full' poles are designed to support larger equipment and serve longer-term needs. GSHi currently bills approximately $15,000 in service pole attachment fees (50% of the OEB’s rate for full poles).

VECC-53 Embedded Generation Ref: CCMBC 25

Question:

REFERENCE: CCMBC 25

a) CCMBC 25 explains that one customer has embedded generation. What customer class is this customer in and does this customer have more than one meter that is owned and/or read by GSHi?

b) Are there any other customers that have more than one meter that is owned/read by GSHi? If yes, please identify for each customer class the number of additional meters that are: i) owned by GSHi or ii) read by GSHi.

Response:

a) The customer referred to in CCMBC 25 is a customer who generates their own power for load displacement at peak under the Industrial Conservation Initiative program. This customer's consumption account is a GS>50 class account. This consumption account has one meter that is owned and read by GSHi. There are two meters associated with the generation at this site which are owned by a third party and are read by GSHi's MV90 system.

b) GSHi has 179 accounts with more than one meter that are owned by GSHi and read through GSHi's Advanced Metering Infrastructure (AMI). While multiple meters per account are no longer permitted, these accounts have been grandfathered as part of a late-1980s pilot project aimed at promoting electric heating. Currently, there are 167 Residential accounts, each with 2, 3, or 4 meters, and 12 GS<50 accounts, each with 2 or 3 meters.

VECC-54 IRR Cost Allocation Model Ref: Tab O2

Question:

REFERENCE: IRR Cost Allocation Model, Tab O2

a) Based on the updated USL class' Minimum System with PLCC Adjustment calculation in sheet O2 of the IRR Cost Allocation Model, please explain why the monthly charge for this class being set at the 2024 approved level.

Response:

a) The USL fixed charge should increase with the change to the Minimum System with PLCC Adjustment value. USL rates have been revised in the updated RRWF and bill impact models such that equal increases are applied to the fixed and variable charges. The fixed charge calculated with equal fixed and variable charge increases no longer exceeds the new Minimum System with PLCC Adjustment maximum fixed charge.