



VIA RESS AND COURIER

December 10, 2008

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

Dear Ms. Walli:

**Re: AMPCO Interrogatories
2009 Electricity Distribution Rates: ENWIN Utilities Ltd.
Board File No. EB-2008-0227**

In accordance with Procedural Order No. 2 dated November 28, 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", written over the "Sincerely yours," text.

Adam White

Copies to: Mr. Andrew J. Sasso, ENWIN Utilities Ltd.
Intervenors

Association of Major Power Consumers in Ontario
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**AMPCO Interrogatories
 2009 Electricity Distribution Rates
 ENWIN Utilities Ltd.
 EB-2008-0227**

Cost Allocation and Rate Design (Exhibit 8)

Interrogatory #1

Issue 7.1 Is ENWIN's cost allocation appropriate?
Ref: Exhibit 8, Tab 1, Schedule 2, Page 1, Table 8-1-2 A

Preamble: For purposes of determining cost allocation and revenue to cost ratios, costs and revenues associated with non-utility operations and with non-recurring regulatory accounts that track deferrals and variances are to be excluded (RP-2005-0317).

- a) Please confirm that ENWIN's calculations of revenue to cost (R/C) ratios do not include costs and revenues associated with non-utility operations and with non-recurring regulatory accounts that track deferrals and variances.
- b) If ENWIN's R/C calculations do not follow the directions of RP-2005-0317, please provide a recalculation of Table 8-1-2 A with the subject costs and revenues excluded.
- c) Please complete the following table and provide the proposed revenue requirement by customer class for the R/C ratios ENWIN proposes, as well as for R/C=1.0 for all customer classes.

Proposed Revenue-to-Cost Ratio by Customer Class

Customer Class	Revenue Requirement	Proposed Revenue to Cost Ratio	Revenue Req. R/C = 1
Residential			
GS<50 kW			
GS>=50kW			
Intermediate			
Large Use - Regular			
Large Use – 3TS			
Large Use - FA			
Streetlight			
Sentinel Light			
USL			
TOTAL			

Interrogatory #2

Issue 7.2 Are the proposed revenue to cost ratios appropriate?
Ref: Exhibit 8, Tab 1, Schedule 2

Preamble: ENWIN is proposing to adjust its R/C ratios slowly, over a period of years. However, this application is for 2009 revenue and rates only.

Normally, cost allocation is not a contestable issue when an application is made to adjust rates under an incentive regulation mechanism (IRM).

- a) Is ENWIN proposing that it will return for a COS hearing for 2010 and 2011 rates in order to adjust its R/C ratios for these years?
- b) In the alternate, is ENWIN seeking the prior approval of the Board to open a subsequent IRM application for 2010 and/or 2011 to consideration of rate adjustments that would accommodate its proposed R/C ratios for these years?

Interrogatory #3

Issue 7.2 Are the proposed revenue to cost ratios appropriate?
Ref: Exhibit 8, Tab 1, Schedule 2, Page 1, Table 8-1-2 A Revenue to Cost Ratios

The evidence states that by 2011 the revenue-to-cost ratio for the Intermediate class will be at 80% and the Large use-regular and large-use 3TS classes will be at 115%. Please explain why ENWIN is proposing that some rate classes be at the low end of the range and some be at the high end.

Other Issues

Interrogatory #4

Please provide the data for the following table:

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

Ref: Exhibit 3, Tab 2, Schedule 1, Page 7

In the Comparison of Ontario Electricity Distributors Costs (EB-2006-0268), the 2007 data (June 24, 2008) found on the OEB website shows the number of customers in 2007 as follows:

Residential	76496
General service < 50 kW	7057
General service >= 50 kW	1194
Large use	<u>10</u>
Sub-Total	84757
Street Lighting	23354
Sentinel Lighting	799

This data differs from the data shown in Exhibit 3, Tab 2, Schedule 1, Page 7. Please indicate the correct data for 2007 to 2009.