

**INTERROGATORIES FOR ENWIN UTILITIES LTD.**  
**FROM THE CONSUMERS COUNCIL OF CANADA**

**EB-2008-0227**

**ADMINISTRATION:**

1. Please indicate specifically when EWU intends to apply for its next rate adjustment. Why is EWU intending to apply for a cost of service adjustment rather than an adjustment under the Board's 3GIRM? On what basis will EWU's rates be set for 2010?

**RATE BASE:**

2. Ex. 2/T1/S1/p. 8

Table 2-1-1 B sets out a Rate Base Additions Summary. Please confirm that these amounts are capital budget amounts and not rate base additions. If not, provide a schedule which sets out EWU's capital expenditures forecast for 2006-2009. Please include 2006 Board approved levels.

3. Ex. 2/T1/S1/p. 11

With respect to new services the 2008 and 2009 budgets are \$2.43 million and \$2.42 million. Please provide a detailed list of all projects included in the 2009 budget. Please provide a detailed justification for those projects.

4. Ex. 2/T1/S1/p. 31

EWU's 2008 forecast expenditures for Replacement of End of Life Equipment on Customer Property are \$651,944. The budget for 2009 is 0. What would be the implications of spreading these expenditures over three years? How much of the 2008 budget has been spent?

5. Ex. 2/T1/S1/p. 36

In 2007 EWU spent \$372,067 on its Pole Top Recloser Program. One of the rationales for proceeding was to reduce outage costs by \$1.1 million. Please identify where in the evidence the \$1.1 million reduction is set out.

6. Ex. 2/T1/S1/p. 40

Please provide a detailed budget for the complete multi-year GIS program. Please provide a business case for the program.

7. Ex. 2/T1/S1/p. 42

EWU is spending \$1.08 million in 2008 and \$106 million on Administrative Sustainability. The projects include information technology, site services and fleet support. Please provide a detailed budget for each of these components of the Administrative Sustainability.

8. Ex. 2/T1/S1/p. 49

Over the three year period EWU is spending almost \$300,000 in “Other Administration” capital. Please provide a detailed account of these expenditures and a rationale for the individual elements of three-year budget.

9. Ex. 2/T1/S1/p. 51

In 2008 and 2009 EWU is proposing to spend almost \$1.4 million in Customer Service capital. Please provide a business case for these expenditures.

10. Ex. 2/T1/S1/p. 60

Please provide a schedule setting out the costs of the SJH Consulting Report and indicate how those costs are to be recovered. Was the contract subject to an RFP process? If not, why not? Please provide the cv of Sarah Horsley which appears to be missing from Appendix A.

11. Ex. 2/T1/S1/p. 62

Please indicate what elements of the Comprehensive ERP will be in-service in 2009, the expected costs to be incurred when the projected in-service dates.

## **REVENUE REQUIREMENT**

12. Ex 1/T2/S2/p. 1

Please provide a schedule in the same format as that set out at Schedule 2 for each year 2006-2008.

## **COST OF SERVICE**

13. Ex. 3/T2/S1

Please provide the total costs of the ERA distribution revenue forecast and weather normalization report. Please explain how those costs are recovered.

14. Ex. 4/T2/S1/p. 1

EWU is proposing an increase in OM&A costs of 8.85% for 2008 and 9.3% for 2009. If EWU was required to reduce its OM&A costs from 2008 to 2009 to 5% what elements of the budget would EWU reduce? Please provide a detailed explanation.

15. Ex. 4/T2/S1/p. 14

The evidence states that the consolidated OM&A budget is presented to the EWU Board of Directors and is formally approved. Please provide the 2009 budget presented to the Board and all materials provided in support of 2009 budget.

16. Ex. 4/T2/S1/p. 6

The evidence states that Regulatory Expenses are increasing by \$392, 835 over 2008 levels and that this represents 50% of the total costs. Please provide the following:

1. Total forecast regulatory expenses related to this cost of service filing. Please include a detailed breakdown of all costs including external legal and consulting costs;
2. Total costs incurred to date and a detailed breakdown of those costs including legal and consulting costs;
3. A detailed breakdown of regulatory costs incurred with respect to the 2006 EDR rate application.

17. Ex. 4/T2/S2/p. 4

Please explain the significant increase in average executive compensation from 2007 to 2009.

18. Ex. 4/T2/S2/p. 5

Please provide the 2006 forecast and actual amounts for overtime. Please provide a detailed description of EWU's overtime policy.

## **REGULATORY ASSETS**

19. Ex. 5/T1/S1/p. 5

Please indicate whether there are balances in account 1565 and 1566. If there are amounts recorded in those accounts please describe the nature of those entries and provide an explanation as to why clearance is not being sought in this proceeding.

20. Ex. 5/T1/S2

Please provide a detailed schedule setting out all smart meter expenditures made to date and the forecast of expenditures going forward. Please indicate the nature of all of the

costs and identify whether they are related to “minimum functionality.” To the extent EWU is undertaking expenditures that relate to activities beyond minimum functionality please describe all such activities and expenditures.

21. Ex. 9/T1/S1/p. 1

The evidence indicates that in calculating the LRAM, where possible, load impacts were calculated based on approved savings per measure as set out in the TRC Guide. Please identify all circumstances where values that are not prescribed by the Guide were used and indicate the basis for the values selected.

22. Ex. 9/T1/S1/Attachment A

Please provide a complete program description of the following 2 CDM programs: “CFL Event” and “Keep Cool/Torchiere Exchange and Porchlight”. Please provide all program costs and a breakdown of how the TRC benefits were calculated.