



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

December 13, 2016

VIA E-MAIL

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

Dear Ms. Walli:

**Re: EB-2016-0091 London Hydro 2017 Rates
Interrogatories of Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed the interrogatories of VECC in the above-noted proceeding.

Yours truly,

A handwritten signature in black ink, appearing to be 'Michael Janigan', written in a cursive style.

Michael Janigan
Counsel for VECC

Martin Benum, Director of Regulatory Affairs
Email: benumm@londonhydro.com

REQUESTOR NAME	VECC
TO:	London Hydro Inc. (LHI)
DATE:	December 13, 2016
CASE NO:	EB-2016-0091
APPLICATION NAME	2017 COS Application

1.0 ADMINISTRATION (EXHIBIT 1)

1.0-VECC-1

Reference: Amended Evidence/E1/T1/S3 & E4/T1/S5

- a) Please provide all correspondence between the City of London and LHI with respect to adjustments to the current service contract for shared billing and the impact of sections 2.6.6 of the Distribution System Code.
- b) Please explain how the \$425,000 in anticipated additional costs of the City of London was calculated.
- c) Please provide the derivation of the \$300,000 adjustment amount.
- d) Please provide the provision in the SLA or contract finalized on March 3, 2016 which contemplates this type of cost adjustments.
- e) Please explain how the late payment revenues of \$529,000 (pg.430) related to water payment are impacted by this change.

1.0-VECC-2

Reference E1/T2/S1/pg.66

- a) Please provide a breakdown of the number of service calls, and service emails by type (water, electricity, other) in each year 2013 through 2016.

1.0-VECC-3

Reference: E1/T2/S1 & E2/T3/S1 Appendix 2-6

- a) Please show the percentage of residential customers on paperless billing in each year 2013 through 2016?
- b) Please show the monthly billing cost per customer in 2012 through 2016. Please explain your calculation.
- c) Please show the derivation of the \$0.83 savings for a customer on paperless billing as compared to paper billing.
- d) Please explain how the savings in paperless billing are shared as part of the water billing service to the City of London.

1.0-VECC-4

Reference: E1/T2/S1

- a) What is the annual cost of the Green Button initiative?
- b) What was the cost to London Hydro of securing water and natural gas data as part of its Green Button initiative?
- c) What value does this initiative provide residential customers? Specifically provide the number of residential customer accounts using the service on a monthly or more basis.
- d) LHI has advertised this product extensively. Has the Utility surveyed customers to find (a) their knowledge of its availability; (b) their views as to its value?

1.0-VECC-5

Reference: E1/T7/S1/pgs. 9-7

- a) Are there any compensation consequence to management at London Hydro it fails to meet any of the metrics outlined at the above reference?

1.0-VECC-6

Reference: E1/T8/S1 2015 Audited Financial Statement

- a) How is the popularity of the MyLondonHydro site measured? Please provide the results of those measurements for the 2013 to 2016 period.
- b) Please provide the equivalent measurement of use for the "Download my Data" and "Connect My Data."
- c) London Hydro has and proposes to continue to spend significant amounts of OM&A and capital on these IT customer outreach projects. Please explain what steps are being taken to measure their value to London Hydro customers.

1.0-VECC-7

Reference: E1/T7/S1

- a) Please explain the income tax receivable of \$416,000 in 2015.

2.0 RATE BASE (EXHIBIT 2)

2.0 -VECC - 8

Reference: E1/T2/S1

- a) Please quantify the reliability improvements over the rate period as a result of implementing the Outage Management System. Specifically, please provide the SAIDI targets that are being set in anticipation of better outage management.

2.0-VECC-9

Reference: E2/T1/S2/pg.20

- a) Please update Table 2-9 for 2016 year-end actuals.

2.0-VECC-10

Reference: E2/S3/pg.42-43

- a) Please explain what “transformer returns” are and how the \$200,000 (credit) for each year 2016 and 2017 was estimated.
- b) What is the actual 2016 credit?
- c) Please provide the capital contributions (actual and forecast) associated with the City of London Road Authority relocations.
- d) Please explain how the Miscellaneous Operating Equipment forecast of \$280,000 for each of 2016 and 2017 was derived. What is the actual 2016 spending to date in this category?
- e) Each year since 2012 LHI has invested capital under the category of “Paving.” In 2016 and 2017 this amount is forecast to be approximately 345k. Please explain the need for annual paving budgets and how the 2016 and 2017 forecasts were derived.

2.0-VECC-11

Reference: E2/T2/S3

- a) Please explain how the capital contributions for 2016 and 2017 shown in Table 2-27 were forecast.
- b) Please provide the actual contributions for 2016.

2.0-VECC-12

Reference: E2/T2/S3

- a) Please provide the capital cost of the original AMI Communications system and the year in which it went into service.
- b) The AMI renewal investments are shown at \$625k in 2016 and \$649k in 2017. Are these the entire capital costs of the AMI renewal program? If not please provide the 2017-2021 program costs.
- c) What are the incremental OM&A costs associated with AMI renewal?

2.0-VECC-13

Reference: E2/T2/S3/ MIST Meter Replacement

- a) London Hydro notes that the DSC requirement for installation of MIST meters within 6 years would be more costly than change out coordinated with Measurement Canada seal life. Has London Hydro estimated the cost for the OEB's accelerated replacement? If yes, please provide that estimate.

2.0-VECC-14

Reference: E2/T2/S3

- a) What is the current and project budget cost of the London Hydro Wireless Networks project for the year 2017-2021, including the acquisition and annual fees for radio spectrum?

2.0-VECC-15

Reference: E2/T2/S3

- a) Please provide an inventory of vehicles by category of vehicle (Pickup/SUV/ Van/Bus/Truck /Car/) for 2012 and 2103 showing the average age of vehicles in each category.
- b) Does London Hydro provide executive vehicles? If yes please provide the number and cost.

2.0-VECC-16

Reference: E2/T2/S3 & E4/T1/S5

- a) Please provide the lease agreement with the City of London for the property at 111 Horton Street.
- b) When this lease was last negotiated?

- c) How are the cost of leasehold improvements shared with the landlord?
- d) Please explain why the lease costs have increased by over 100% (\$100k to \$219k since 2013).

2.0-VECC-17

Reference: E2/T2/S3/Table 2-39

- a) Please explain the capital costs for Customer Engagement – Residential for each year 2014 through 2017. Please show the 2018-2021 forecasts for these categories.
- b) Please explain the capital costs for Customer Engagement – Commercial & Industrial for 2015 through 2017. Please show the 2018-2021 forecasts for these categories.
- c) What are the projected capital costs for these categories for 2018 through 2020?
- d) Please provide the annual OM&A costs related to these capital investments in each year 2014 through 2021 (forecast).

2.0-VECC – 18

Reference: E2/T2/S3/pg. 142

- a) Please provide the IT capital budget for 2016 and 2017 for Regulatory Changes.
- b) Please confirm that no specific projects have been identified for this “container”.
- c) If this cannot be confirmed please identify the specific IT regulatory projects.

2.0-VECC-19

Reference: E2/T2/S3

- a) When was LHI’s current Oracle bill print system put in service?
- b) What was the capital cost of the legacy system?
- c) Please provide the 2017 through 2020 capital and (separately) OM&A costs for this system’s replacement.

2.0-VECC-20

Reference: E2/T3/S1/ Appendix 2-6 Distribution System Plan

- a) Please provide the SAIDI and SAIFI breakdown by cause code for each of 2012 through 2016.

2.0-VECC-21

Reference: E2/T3/S1/ Appendix 2-6 Distribution System Plan Section 3.1.2

- a) Do the forecast capital annual expenditures shown at section 3.1.2 include the Nelson TS Capital Contributions, JD Edwards Project or the HONI CCRA Ture-Up for Talbot and Buchanan?
- b) Please provide the forecast capital contributions for each year 2017 through 2021 in the table at section 3.1.2.

2.0-VECC-22

Reference: E2/T3/S1/ Appendix 2-6 Distribution System Plan Section

- a) Has London Hydro carried out an asset assessment of each category of asset (poles, transformers etc.)?
- b) If yes, please provide the results of that asset assessment showing the assets by condition (good, fair, poor etc.)
- c) Please explain how each asset category condition is determined (sample testing, age probability, population testing etc.)
- d) If no such asset assessment has been carried out please explain when one is expected to be completed.

3.0 OPERATING REVENUE (EXHIBIT 3)

3.0 –VECC -23

Reference: E3/T1/S2, pages 1 - 3 (Charts 3-1 and 3-2) and pages 17-18

- a) The predicted values in the Charts 3-1 and 3-2 appear to be different. How were each established?
- b) Please provide a schedule (or excel file) that for each month of the historic 10 years used sets out:
 - i. The power purchases per the IESO.
 - ii. The embedded generation purchased by London.
 - iii. The specific adjustments made to recognize the one Large User that no longer exists (per page 3).
 - iv. Any other adjustments made to determine the data used for modelling purposes, with descriptions of specifically what the adjustments were for.

3.0 –VECC -24

Reference: E3/T1/S2, pages 1 - 3 and pages 17-18

- a) Were any adjustments made to the historical data for those months prior to mid-2012 in order to remove the usage for the four GS>50 kW customers who opted to become wholesale market? If not, why not?
- b) Please provide a revised series of monthly purchase values where the usage for these four customers is removed for the months prior to mid-2012 when they were not market participants?
- c) Using the values from part (b), please re-estimate the load forecast model and provide a revised forecast for 2016 and 2017 comparable to that in Table 3.1.2.1. Please provide the supporting excel model.
- d) Alternatively, was any consideration to adding the usage for these customers into the adjusted purchase value for the months following mid-2012 when they were market participants? If not, why not?

3.0 –VECC -25

Reference: E3/T1/S2, pages 3-7

- a) Please clarify whether London used population or labour force as an explanatory variable. The text on page 4 (lines 5-9) makes reference to both.
- b) Please provide a copy of the referenced document prepared by the Credit

Unions of Ontario and the Ontario Chamber of Commerce (page 4, lines 6-7).

- c) It is noted, page 5, that the “Population” variable is not statistically significant. Why was it retained in the equation and what would be the regression model, model statistics and resulting forecast for 2016 and 2017 if it was excluded?
- d) It is noted that the coefficient on the “Time in Years” variable is negative. Is it reasonable to assume that this variable is picking up some/all of the impact of CDM programs initiated during 2006-2015?
- e) Please explain more fully why (per page 4) CDM Activity was excluded as an explanatory variable when it was included in the model used for London’s 2013 COS Application.
- f) Please complete the following chart regarding the verified impact of 2006-2015 CDM programs:

CDM Prog. Year	Verified CDM Program Impacts Calendar Year									
	'06	'07	'08	'09	'10	'11	'12	'13	'14	'15
2006										
2007										
2008										
2009										
2010										
2011										
2012										
2013										
2014										
2015										
Total										

- f) Please confirm whether the “normalized” values shown in Table 3.1.2.1 are based on actual or weather normal values for HDD and CDD.
- g) Are the “normalized” values shown in Table 3.1.2.1 the same as the “predicted” historic values shown in Chart 3-3? If not, what is the difference in terms of how they were determined?
- h) Please provide the purchase forecast for 2016 and 2017 based the 20-year trend values for HDD and CDD as directed by the Board’s Filing Requirements.

3.0 –VECC -26

Reference: E3/T1/S2, pages 7-8

- a) Please confirm whether the average loss factor used to convert to billed kWh was based on 2006-2015 (as suggested by Table 3.1.2.30) or 2007-2015 (as stated in the text at page 7, line 9).

3.0 –VECC -27

Reference: E3/T1/S2, pages 8-13

- a) Does the data used in determining the values in Table 3.1.2.5 for the GS>50 class for the period up to the start of 2012 include the 4 customers that are now market participants?
- b) Does the data use in determining the values in Table 3.1.2.5 for the GS>50 class for period after mid-2012 include the 4 customers that are now market participants?
- c) If the response to either (a) and/or (b) is yes, what would be the geometric growth rate for the class for the four years 2012-2016 (per Table 3.2.1.6) if these four customers were excluded from the determination of the 2011-2015 average customer counts?
- d) What was the customer/connection count for each class as of June 30, 2016? For the GS>50 class, please indicate whether the response includes or excludes the four market participants.

3.0 –VECC -28

Reference: E3/T1/S2, pages 13-16
IESO 2015 Verified CDM Savings Excel File
Appendix 2-I

- a) Please provide a copy of London's 2015-2020 CDM Plan as submitted to the IESO.
- b) Please explain why, for the impact of 2015 CDM programs, London has used the "planned" program savings of 35,386,333 kWh as opposed to the actual IESO verified 2015 savings of 31,995,332 kWh.
- c) It is noted that in the Application (page 16) the CDM adjustment for 2017 is based on 100% of 2015 CDM program savings, plus 50% of 2016 CDM program savings plus 50% of 2017 CDM program savings. However, in Appendix 2-I the adjustment is based on 50% of 2015, plus 100% of 2016 plus 50% of 2017. Please explain why the Application did not use 50%, 100% and 50% for 2015, 2016 and 2017 respectively.

3.0 –VECC -29

Reference: E3/T1/S2, pages 18-23

- a) It is noted that the same growth rate in use per customer (99.82%) is applied to both the Market Participants (page 17) and the non-Market Participants (page 20) in the GS>50 class. Does the data used to calculate this growth rate (Tables 3.2.1.5 and 3.2.1.16) include the count and usage for both categories of customers.
- b) If the response to part (a) is no, please explain why it is appropriate to apply this growth rate to both categories of customers?
- c) If the response to part (a) is no, please recalculate the average annual use per customer for the combination of the two categories for each of 2011 through 2016; the resulting growth rates for 2012-216 and the resulting overall geomean growth rate.
- d) If the response to part (a) is no, please recalculate for just the GS>50 customers that are not market participants - the average annual use per customer using for the GS>50 each of 2011 through 2016; the resulting growth rates for 2012-216 and the resulting overall geomean growth rate
- e) Please confirm that, for purposes of the weather normalization adjustment (Table 3.2.1.22) London has assumed that 100% of Residential and GS<50 load is weather sensitive. If so, why is this assumption reasonable?

3.0 –VECC -30

Reference: E3/T1/S2, pages 23-24

- a) Please explain why, for Co-generation, the average last four year's historical use (2012-2015) was used to establish the forecast kW when the number of Cogeneration customers increased in 2014 and (per Table 3.1.2.26) there was a significant increase in this class' use post 2012.

3.0 –VECC -31

Reference: E3/T3/S1, page 7

- a) Please explain the decrease in Miscellaneous Service Revenues between 2014 and 2015.

4.0 OPERATING COSTS (EXHIBIT 4)

4.0 -VECC -32

Reference: E1/T2&T5/S1

- a) Please provide the derivation of the \$2.59 million in incremental OM&A that London Hydro believes is required for new services provided to customers.

4.0 -VECC -33

Reference: E1/T5/S5/pgs. 3-4

- a) Please provide the incremental costs as compared to 2013 for each of the new initiatives listed at the above reference.

4.0 -VECC -34

Reference: E4/T1/S5/pg.5

- a) Please confirm the OM&A figures shown in Table 4.3 show both the inclusion in 2013 and exclusion in 2014 of the SAP disputed amount of \$658,800.

4.0 -VECC -35

Reference: E4/T1/S5/pg.7

- a) Have any of the overhead policies described at pages 7-8 changed since the last cost of service application? If yes please describe the change and the impact on the test year OM&A as compared to 2013 Board approved.

4.0 -VECC -36

Reference: E4/T1/S5/pg.21 &

- a) Please explain the difference between the computer hardware and software depreciation savings of \$217,580 shown in Table 4-8 and the similarly described depreciation savings of \$684,994 shown in Table 4-13.

4.0 -VECC -37

Reference: E4/T1/S5

- a) Please recalculate Table 4-11 by including 2013 Canada CPI, using the actual 10 month 2016 CPI (Oct) and eliminating the 2017 forecasted inflation

4.0-VECC-38

Reference: E4/T1/S5/pg.43

- a) What is the mandated LEAP amount based on the proposed revenue requirement?
- b) What amount has the Salvation Army Centre of Hope disbursed in each of 2013 through 2016?

4.0-VECC-39

Reference: E4/T1/S5/pgs. 49-

- a) Please provide a table showing the amount of consulting and/or contractor services in years 2013 through 2017 in each category (e.g. asset management, operations and maintenance, metering and data management etc.). Specifically explain what services were contracted for in 2013 and what services are forecast to be contracted for in 2017.

4.0-VECC-40

Reference: E4/T1/S5

- a) Please explain how LHI has concluded that the cost of its in-house smart meter operations have an avoided cost of \$610,000 per year. Specifically please show the derivation of the \$140,000 in internal costs for the smart meter network and how the estimate of \$750,000 for similar third party services was calculated.
- b) Please also show how London Hydro has come to the conclusion that its decision to own and operate its wireless communications equipment rather than lease has proven to be the least cost alternative.
- c) What is the annual cost (labour and capital) of operating the in-house electric meter department?
- d) Has London Hydro had a third party review of its in-house smart meter solutions (including owning its own telecommunications network) as compared to a third party solution? If yes, please provide that study.

4.0-VECC-41

Reference: E4/T1/S5 Appendix 4-1/pg.2

- a) E&Y note that LHI needs to rebuy JDE licences due to moving off Oracle software licence maintenance in 2011. What was the annual licence maintenance fee in 2011?
- b) What is the estimated cost to rebuy the licences?
- c) Would LHI have needed to buy any new licences had it continued its licence maintenance agreement?
- d) Please provide the costs of continuing with the JDE solution if the prior licences had not been allowed to lapse.
- e) Why did LHI discontinue its licence maintenance prior to having a third-party review alternative solutions?

4.0-VECC-42

Reference: E4/T1/S5/pg.46

- a) London Hydro states it has leased new property at an annual cost of \$100,000 plus annual taxes of \$19,000 for additional parking. The FTE incremental growth since 2013 is (proposed) to be 6. Please explain what additional parking requirements occurred since 2013 to require this significant investment.
- b) What alternatives were reviewed to alleviate parking issues at 111 Horton? Specifically were inducements such as subsidy of public transit considered?
- c) What fee(s) do staff currently pay for parking?

4.0-VECC-43

Reference: E4/T1/S5/Table 4-27

- a) Please provide the number of manual read meters in service in 2013 and forecast to be in service in 2017.
- b) Please breakdown the 610k (2013) and 550k (2017) in meter reading services into labour and other costs.

4.0-VECC-44

Reference: E4/T1/S5/Table 4-49

- a) Please provide the number of FTEs in the Human Resources, Health and Safety area of responsibilities.
- b) Please explain the 87% increase in corporate employee expenses since 2013.

4.0-VECC-45

Reference: E3/T1/S5/pg.378

- a) Please provide the annual OEB cost assessment for each of 2012 through 2016 showing separately the annual assessment and any other (section 30 or other) assessment in each year.
- b) Please provide any correspondence between the OEB and London Hydro explaining the near doubling of annual assessment costs in 2017.
- c) The application costs are noted at \$325k. Please reconcile Table 4-119 with the one application costs listed in Appendix 2-M of the Chapter 2 filing requirements (Excel ...20160826).

4.0-VECC-46

Reference: E4/T1/S5/pg.346/Table 4-64

- a) Please list and describe each of the 6 incremental FTE positions added since 2013.

4.0-VECC-47

Reference: E4/T1/S5/pg.346/Table 4-69

- a) Please show the 2013 and 2017 (forecast) number of hours of Emergency overtime and Planned overtime.
- b) Please explain how the overtime costs for 2017 were forecast.

4.0-VECC-48

Reference: E4/T1/S5

- a) Please explain how the \$400k forecast for customer call overflow services was derived.
- b) What have been the actual overflow costs in 2016?

4.0-VECC-49

Reference: E4/T5/S5

- a) Is LHI seeking to recover 2014, 2015 and 2016 costs for its distribution system plan?
- b) If yes, please explain the basis for these retroactive recoveries.
- c) Are the amounts in Table 4-120 all consulting or outside contractor costs?

4.0-VECC-50

Reference: E4/T1

- f) Please provide the annual EDA fees for 2013 through 2017.

4.0 -VECC -51

Reference: E4/T1/S5, page 448

- b) Please indicate whether the values set out in Table 4-126 reflect the expected savings for just the programs in years 2012 – 2013 or whether they also include the savings expected for 2011 programs at the time of the 2013 COS Application.

4.0 -VECC -52

Reference: LRAMVA Work Form, Tab 6 – Persistence Rates
EB-2016-0058, Interrogatory Responses, Attachment 3-VECC
23 A and 3-VECC 23 B

- a) Please provide the source for the persisting savings from 2011-2014 CDM programs as set out in the above referenced Tab for the period through to 2015. Note – If there is supporting document, please provide.
- b) If not provided in response to part (a), please provide IESO reports regarding the persistence of individual 2011-2014 programs similar to that provided by Brantford Power in EB-2016-0058.

5.0 COST OF CAPITAL AND RATE OF RETURN (EXHIBIT 5)

5.0-VECC-53

Reference: E1/T8/S1 Rating Agency Report

At page 2 of the S&P Global Ratings it states: *“We believe an upgrade during the next two years is highly unlikely. However, we would consider one if the company were to implement a well-articulated financial and dividend policy aligned with a shareholder agreement, which enshrined the current modest balance sheet leverage. As well we would have to be satisfied that there was negligible potential for alignment with a more highly levered deemed capital structure used by the Ontario regulator for setting rates. In that case, we would could reduce the impact of the financial policy modifier, raising the rating.”*

- a) In light these comments and London Hydro's significant under leverage what changes have been considered financing the utility?

5.0-VECC-54

- a) Infrastructure Ontario currently offers serial and amortizer loans of varying terms for rates between 2.16% and 3.94%. These rates are lower than those discussed in the evidence. Given this, please explain why London Hydro is not considering borrowing from Infrastructure Ontario?

6.0 CALCULATION OF REVENUE DEFICIENCY/SURPLUS (EXHIBIT 6)

None

7.0 COST ALLOCATION (EXHIBIT 7)

7.0 – VECC –55

Reference: E7/T1/S1, page 3, Table 7.1.1.2

- a) Please explain why from 2013 to 2017 the percentage of primary poles tower and fixtures has decreased whereas the percentage of primary overhead conductors and devices has increased (i.e., why aren't both percentages changing in the same direction?).
- b) Please explain why from 2013 to 2017 the percentage of primary underground conduit has decreased whereas the percentage of primary underground conductors and devices has increased (i.e., why aren't both percentages changing in the same direction?).

7.0 – VECC –56

Reference: E7/T1/S1, pages 4-6

- a) Please explain why, in Table 7.1.1.3, there is now an allocation of Services to the Large User, Cogeneration and Backup/Standby classes whereas in 2013 there wasn't any.
- b) Please explain why, in Tables 7.1.1.4 and 7.1.1.5, the meter capital cost weighting factors and meter reading weights for GS>50 and the Large Use classes have decreased from those in 2013.
- c) Based on the billings costs directly allocated to Street Lighting, what is the class' implicit billing and collecting weighting factor?

7.0 – VECC –57

Reference: E7/T1/S1, pages 7-10

- a) Please provide the cost allocation results if the load profiles used in London's 2013 COS Application had simply been prorated to reconcile with the each customer class' forecast 2017 energy use.
- b) What percentage of demand-related costs is allocated using the 4NCP allocator (per page 9, lines 19-22)?
- c) Please revise the first part of Table 7.1.1.7 so as to also include the temperature on the hottest day in 2015 for each of the four months.
- d) Using data for the period 2006-2015 what was the average temperature on the hottest day in each of June, July, August and September over the 10-year period?

7.0 – VECC –58

Reference: E7/T1/S3, pages 1-3

- a) What would be the bill impacts for the GS>50, Sentinel Lighting and USL classes if the R/C ratios were all adjusted to be within the Board's policy range for 2017?

8.0 RATE DESIGN (EXHIBIT 8)

8.0 –VECC - 59

Reference: E8/T1/S1, page 8
E8/T2/S1, Attachment 1
RRWF, Tab 12

- a) Please explain why the proposed Residential fixed charge set out at page 8 is \$20.11 while the final adjusted rate in Attachment 1 is \$20.02?
- b) Please explain why the final adjusted rate in Attachment 1 is \$20.02 whereas in the RRWF, Tab 12 it is \$19.94.

8.0 – VECC –60

Reference: E8/T1/S1, pages 5-6
E8/T12/S1, Attachment 2

- a) Please clarify, under London's proposal, will the microFIT customers continue to also pay the \$5.40 per month as well as the \$32.88?
- b) If not, how is proposed microFIT adjustment revenue neutral overall?
- c) If yes, why is the microFIT charge not in the Proposed Tariff of Rates and Charges?
- d) Does London have any microFIT customers that are currently classified as Residential for their main service? If so, how are they affected by the proposed changes?

8.0 – VECC –61

Reference: E8/T1/S1, page 10
E8/T12/S1, Attachment 2

- a) Please explain why the proposed fixed/variable rates in Table 8.1.1.14 don't match the proposed rates in Attachment 2 for: i) GS<50, ii) GS 50-4,999, and iii) Co-generation.

8.0 – VECC –62

Reference: E8/T11/S1, pages 1-2

- a) How are the loads for the 5 residential and 3 GS<50 current net metered customers treated in the cost allocation set out in Exhibit 7, i.e., are the values used net or gross absolute values?.

8.0 – VECC –63

Reference: E8/T11/S2, page 1

E8/T12/S1, Attachment 2, page 49

- a) Please explain how London determines whether or not Standby Power Service has been provided in a given month.
- b) How is the billing determinant for the Rate Riders charged on a \$/kW determined each month for Standby customers?

9.0 DEFERRAL AND VARIANCE ACCOUNTS (EXHIBIT 9)

9.0-VECC-64

Reference: E9/T1/S5

- a) Please provide a list of all new deferral or variance accounts LHI is applying for in this application
- b) For each account please provide a precedent of another utility who has had a similar account approved by the Ontario Energy Board.

9.0-VECC-65

Reference: E9/T1/S5

- c) Please explain how the Green Button Project meets the criteria for deferral account 1534 and 1535 given its that it is an ongoing operation of the utility. Specifically, what distinguishes the “pilot” portion of this project from any other part?
- d) Please explain why the VAR compensators were booked into the smart grid deferral account rather than being considered ongoing utility work.

End of document