

October 11, 2017

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

Dear Ms. Walli:

**Re: EB-2017-0069 – Oshawa PUC Networks Inc. – Mid-Term Update – 2018 and 2019**

Please find, attached, interrogatories on behalf of the Consumers Council of Canada for Oshawa PUC Networks Inc. pursuant to the above-referenced proceeding.

Please feel free to contact me if you have questions.

Yours truly,

*Julie E. Girvan*

Julie E. Girvan

CC: All Intervenors  
Phil Martin, Oshawa PUC Networks Inc.  
Ian Mondrow, GOWLING

**INTERROGATORIES FOR OSHAWA PUC NETWORKS INC.**

**EB-2017-0069**

**FROM THE CONSUMERS COUNCIL OF CANADA**

**CCC-1**

Ex. A/p. 10

The evidence states that OM&A was lower than forecast by 1.5% as a result of the merger discussions during 2016 and consequent deferral of planned labour expenses. Please explain how “merger discussions” reduce OM&A. What is the current status of Oshawa’s merger discussions?

**CCC-2**

Ex. A/p. 12

Please explain how OPUCN arrived at a proposed customer growth rate of 1.8%. Has the Region of Durham updated its Durham Regional Official Plan since June 26, 2015? If so, please provide a copy of the updated report. What is the current forecast from the City of Oshawa regarding forecast customer growth?

**CCC-3**

Ex. A/p. 16

Re: Capital Expenditures

Please re-cast Table 2-32 – Appendix 2-AA Capital Projects from EB-2014-0101 to include 2015 and 2016 Actual amounts at the same level of detail.

**CCC-4**

Ex. A/p. 16

Please explain the reasons for significant variance between the forecast amount and the current expected contribution to Hydro One for the Enfield TS. Is the \$4 million a final amount? If not, under what circumstances could it be subject to change? Please explain when OPUCN identified the \$6.5 million cost related to the feeder arrays which are required to integrate the Enfield TS connection to OPUCN’s system.

**CCC-5**

Ex. A/p. 17

The evidence states that the forecast for the MS9 substation remains unchanged from the time of the CIR Application at \$7 million. Please provide a detailed list of the expenditures made to date and a forecast of the expenditures required to complete the project. Please indicate the month in 2018 that the station is expected to be in service.

**CCC-6**

Ex. A/p. 17

In the 2015 Decision the OEB required that at the mid-term review OPUCN provide an update related to third party requests for relocation of OPUCN's plant. The evidence states that with respect to plant relocations the cumulative total capital is expected to be approximately \$2.4 million below plan at the end of 2017. It is OPUCN's position that based on City and Regional Planning and the completion of infrastructure for the 407 ETR extension, it expects the total planned capital for third-party requested relocations to be spent. Please provide a schedule setting out the relocation budget in each year of the 5-year plan, what has actually been spent to date in each year and the plan for 2018 and 2019. Please provide more detailed evidence to support the statement that the cumulative shortfall will be spent in 2018 and 2019.

**CCC-7**

Ex. A/p. 21

Please provide a detailed explanation as to how the \$160,000 forecast revenue requirement reduction arising from the impact of the Fair Hydro Plan was calculated. Please include all assumptions. Please explain how Oshawa has applied the Fair Hydro plan in establishing its bills and rates.