

1 **Energy Cost Management Inc (ECMI) INTERROGATORY #1 List 1**

2
3 **Interrogatory**

4
5 Does the statement “Any new customer satisfying the criteria for ST classification, will
6 be classified as an ST account “ include a delivery point to an LDC ?

7
8 Feb 20 2008 ref
9 Exhibit G2
10 Tab 94
11 Schedule 1
12 Page 1 of 8
13 Page 3476 of February 2008 pdf

14
15
16 **Response**

17
18 Yes
19

1 **Energy Cost Management Inc (ECMI) INTERROGATORY #2 List 1**

2
3 **Interrogatory**

- 4
5 a) If the answer to ECMI interrogatory #1 is no, what does it mean, and
6 b) what would happen to a new LDC delivery point?

7
8
9 **Response**

10
11 Please see response to interrogatory Exhibit H, Tab 4, Schedule 1.
12

1 **Energy Cost Management Inc (ECMI) INTERROGATORY #3 List 1**

2
3 **Interrogatory**

4
5 How many of the 358 embedded LDC delivery points as referenced in Table 9 are
6 delivery points as Wholesale Market Participant delivery points?

7
8 Feb 2008 ref
9 Ref G1
10 Tab 2
11 Schedule 3
12 9 of 9
13 Page 1556 of Feb 2008 pdf

14
15
16 **Response**

17
18 289 delivery points out of 358 embedded LDC delivery points are Wholesale Market
19 Participant.
20

1 **Energy Cost Management Inc (ECMI) INTERROGATORY #4 List 1**

2
3 **Interrogatory**

- 4
5 a) How many of the 358 embedded LDC delivery points as referenced in Table 9
6 are delivery points which are Wholesale Market Participant delivery points
7 through ISO approved delivery point (using current standards for such
8 metering) have resulted in under billing by the applicant due to metering
9 errors?
10
11 b) Please provide the amount in dollars, and
12
13 c) the number of delivery point locations involved in such incidences.
14

15
16 **Response**

- 17
18 a) None
19
20 b) None
21
22 c) None
23

1 **Energy Cost Management Inc (ECMI) INTERROGATORY #5 List 1**

2
3 **Interrogatory**

- 4
5 a) How many of the 358 embedded LDC delivery points as referenced in Table 9
6 are delivery points which are Wholesale Market Participant delivery points
7 through ISO approved delivery point (using current standards for such
8 metering) have been involved in theft of power by the LDC resulting in losses
9 by the applicant?
10
11 b) Please provide the amount in dollars and
12
13 c) the number of delivery point locations involved in such incidences
14

15
16 **Response**

- 17
18 a) None
19
20 b) None
21
22 c) None
23

1 **Energy Cost Management Inc (ECMI) INTERROGATORY #6 List 1**

2
3 **Interrogatory**

- 4
5 a) How many of the 358 embedded LDC delivery points as referenced in Table 9
6 are delivery points which are Wholesale Market Participant delivery points
7 through ISO approved delivery point (using current standards for such
8 metering) have resulted in a requirement for the applicant to provide surety or
9 similar guarantees to the ISO?
10
11 b) Please provide the amount in dollars and
12
13 c) the number of delivery point locations involved in such incidences
14

15
16 **Response**

- 17
18 a) None
19
20 b) None
21
22 c) None
23

1 **Energy Cost Management Inc (ECMI) INTERROGATORY #7 List 1**

2
3 **Interrogatory**

- 4
5 a) How many of the 358 embedded LDC delivery points as referenced in Table 9
6 are delivery points which are Wholesale Market Participant delivery points
7 through ISO approved delivery point (using current standards for such
8 metering) have been abandoned by the LDC and resulted in a loss in revenue
9 to the applicant (excluding those which were delivering power to LDC's
10 acquired by the applicant or point which where such action was at the request
11 of the applicant)?
12
13 b) Please provide the amount in dollars, and
14
15 c) the number of delivery point locations involved in such incidences
16

17
18 **Response**

- 19
20 a) None
21
22 b) None
23
24 c) None
25

1 **Energy Cost Management Inc (ECMI) INTERROGATORY #8 List 1**

2
3 **Interrogatory**

4
5 What is the basis of the 500kW demand?

6
7 Feb 2008 ref
8 Ref G1
9 Tab 2
10 Schedule 3
11 8 of 9
12 Page 1555 of Feb 2008 pdf

13
14
15 **Response**

16
17 Hydro One Networks' policy is that the maximum padmount transformer size it supplies
18 is 500 kVA, and the maximum overhead (polemount) transformer size it supplies is 501
19 kVA. Customers would supply and own transformers larger than 500 kVA.

20
21 500 kVA is also the threshold used in determining at what voltage customers should be
22 connected. At 500 kVA or higher, a sub-transmission voltage connection is required, e.g.
23 13.8 kV to 44 kV.

24

1 **Energy Cost Management Inc (ECMI) INTERROGATORY #9 List 1**

2
3 **Interrogatory**

4
5 The revised revenue requirement from the current rates in Table 1 for the proposed Sub
6 Transmission class is \$64.2m. If the ST class were split into LDC and retail
7 over500kWseparate classes please provide the values for the expanded table.

8
9 Table 9
10 Exhibit G1
11 Tab 2
12 Schedule 3
13 Page 9 of 9
14 Page 1572 of Feb 2008 pdf

15
16
17 **Response**

18
19 We understand the reference to be to Table 1 on page 2 of Exhibit G1, Tab 3, Schedule 1.

20
21 The \$64.2 million estimated 2008 Revenues at adjusted current rates from the ST class
22 shown in Exhibit G1, Tab 3, Schedule 1, page 2, Table 1, includes \$23.5 million from
23 only LDCs and \$40.7 million from the rest of the ST customers, that is, Directs, Large
24 Users, and other end-use customers being mapped into the new ST class.
25

1 **Energy Cost Management Inc (ECMI) INTERROGATORY #10 List 1**

2
3 **Interrogatory**

4
5 The revised revenue requirement from proposed rates for the proposed Sub Transmission
6 class is \$27.4m. If the ST class were split into LDC and retail over 500kW separate
7 classes please provide the values for the expanded table.

8
9 Table 9
10 Exhibit G1
11 Tab 2
12 Schedule 3
13 Page 9 of 9
14 Page 1572 of Feb 2008 pdf

15
16
17 **Response**

18
19 We understand the reference to be to Table 1 on page 2 of Exhibit G1, Tab 3, Schedule 1.

20
21 Hydro One can provide an estimate of how much of the \$27.4 million revenue
22 requirement allocated to the ST class in Table 1 would be collected from LDCs based on
23 the results of the OEB Cost Allocation Model included in the pre-filed evidence. The
24 amount is \$18 million and assumes that the ST class revenue to cost ratio is equal to 1.

25
26 A substantial amount of effort, and information that is not readily available, would be
27 required to split the ST class and do the cost allocation separately for LDCs and other ST
28 customers. The effort would include making modifications to the OEB cost allocation
29 model, completing a detailed analysis of the assets specifically used to supply LDC
30 customers versus other ST customers, and developing a wide range of customer load data
31 for LDCs and other ST customers separately.

32
33 The new ST class is composed mostly of Embedded LDC customers, which account for
34 approximately 80% of the ST class consumption. Therefore, creating a customer class
35 exclusively of Embedded LDCs would not produce significantly different results than for
36 the ST class proposed.