Centre Wellington Hydro Response To Board Staff Interrogatories

Combined Distribution Service Area Amendments Proceeding RP-2003-0044

1. Please provide a precise description of the proposed amendment service area suitable for inclusion in the amended licence.

I1.10.1. It was not our intent in this Application to "precisely" define a service area for the proposed amendment, but to propose a service area amendment that would be more "precisely" defined in the legal description required in Section 1 of a new distribution licence. For the purpose of responding to this question we have the defined the amendment service area more precisely as follows:

COMMENCING at a point where the centre line of Irvine Street in the Geographic Township of Nichol, is intersected by the centre line of Sideroad No. 15;

THENCE in a Northeasterly direction along the centre line of Sideroad No. 15, Geographic Township of Nichol, to it's intersection with the centre line of the King's Highway No. 6;

THENCE continuing in a Northeasterly direction, along the Northeasterly extension of the centre line of Sideroad No. 15, Geographic Township of Nichol, to a point where the aforesaid centre line intersects with the centre line of Concession 2, in the Geographic Township of West Garafraxa:

THENCE in a Southeasterly direction, along the centre line of Concession 2, in the Geographic Township of West Garafraxa, to a point therein, which point is distant 420 metres, measured in a Southeasterly direction from the intersection of the aforesaid centre line of Concession 2, Geographic Township of West Garafraxa, with the Northeasterly extension of the centre line of the Second Line Road in the Geographic Township of Nichol;

THENCE in a Southwesterly direction along the Northeasterly extension of the centre line of the Second Line Road in the Geographic Township of Nichol, to a point in the centre line of Guelph Street (Geographic Township of Nichol), which point is distant 515 metres, measured in a Southeasterly direction along the centre line of Guelph Street from its intersection with the centre line of the Second Line Road;

THENCE Northwesterly along the centre line of Guelph Street, Geographic Township of Nichol, a distance of 515 metres to a point where the centre line of Guelph Street is intersected by the centre line of the Second Line Road, of the Geographic Township of Nichol;

THENCE in a Southwesterly direction along the centre line of the Second Line Road of the Geographic Township of Nichol, to a point where it is intersected by the centre line of Sideroad No. 6 North, in the Geographic Township of Nichol;

THENCE Northwesterly along the centre line of Sideroad No. 6 North (Geographic Township of Nichol), to a point therein, which point is distant 890 metres, measured in a Southeasterly

direction along the centre line of Sideroad No. 6 North (Geographic Township of Nichol), from its intersection with the centre line of the First Line Road of the Geographic Township of Nichol:

THENCE in a Southwesterly direction, parallel with the First Line Road of the Geographic Township of Nichol to a point, which said point is distant 750 metres measured in a Southwesterly direction from its intersection with the centre line of Wellington County Road No. 7;

THENCE in a Northwesterly direction, parallel with the centre line of the original Road Allowance along the boundary between the Geographic Townships of Nichol and Pilkington, to a point which is distant 685 metres measured in a Southeasterly direction from its intersection with the centre line of Wellington County Road No. 18;

THENCE in a Northeasterly direction, parallel with the centre line of Wellington County Road No. 18, and its Northeasterly extension, to a point in the centre line of Irvine Street, which point is distant 685 metres measured in a Southeasterly direction along the centre line of Irvine Street from its intersection with the centre line of Side Road No. 15:

THENCE in a Northwesterly direction along the centre line of Irvine Street, a distance of 685 metres to the point of commencement.

Please note that to simplify the description of the proposed amendment, minor modifications have been made.

- 2. Does your application propose an overlapping or non-overlapping service area amendment?
 - *11.10.2.* The Application proposes an overlapping service area amendment.
- 3. Are there existing customers in the proposed expanded service area? If so, who will serve these existing customers if the proposed amendment is granted?
 - I1.10.3 Hydro One is currently serving existing customers in the proposed expanded service area and CWH expects this arrangement to continue into the future.
- 4. Could existing customers of Hydro One (if any) choose to switch to Centre Wellington? If yes what distribution assets would be used to serve them? If Hydro One's assets, please describe the metering, billing and other arrangements necessary to serve them. If Centre Wellington's assets, describe how Hydro One would be compensated for a) lost revenue b) stranded assets?
 - 14.10.4 The intent of our Application was to allow only new customers the opportunity to choose their distributor where applicable. Extending the distribution system into underdeveloped areas is unlikely to strand any assets.

5. What are Centre Wellington's Reliability Indices and Service Quality Indicators?

!4.10.5. CWH's reliability and service quality indicators for 2000 – 2002 are shown in the table below:

	2000	2001	2002
Emergency response	36	102	34
SAIDI	0.609	0.423	0.199
CAIDI	0.462	1.283	0.253
SAIFI	1.319	0.330	0.785
New Connections	194	167	235

6. What other quantitative evidence is available to compare Centre Wellington's reliability and service quality with that of Hydro One's reliability and service quality in the area? Please provide such evidence.

I1.10.6. There is no other quantitative evidence to be provided to compare reliability and service quality between CWH and Hydro One. For the purpose of this Application, CWH is not making any comparisons between its service quality indicators and reliability and those of Hydro One.

7. What are Centre Wellington's distribution rates that would apply in the amended service area? How do these compare with Hydro One's rates?

I1.10.7. The currently approved schedule of rates of CWH would apply in the amended service area as appropriate. We do not know how CWH's schedule of rates compare with Hydro One's because they are not developed on the same basis (e.g. definitions of customer's, class, size, rate schedules, etc.). CWH believes that the customer is in the best position to make these comparisons and ask questions. We assist customers by providing our rate schedules and by directing them to the local Hydro One office for rate information.

8. Will additional load transfers or metering points be required as a result of this proposed service area amendment? If yes, identify specific ones if possible.

I1.10.8. No additional load transfers or metering points will be required as a result of this service area amendment. However, the issue of load transfers is one that will have to be clearly defined by the Board.

9. On p.3, Section 2.8 of Centre Wellington's reply submission dated March 11, 2003, there is an implication that customers in the amendment area wishing to connect would pay any associated cost of resulting duplications and inefficiencies. How would this cost be calculated and administered?

I1.10.9. There is no expectation of planned duplications or inefficiencies. If a customer chose to be served by CWH. CWH would work closely with the customer and Hydro One, if necessary, to minimize any possibility of system duplication or inefficiency in terms of service, supply or location.

Costs would be calculated and administered in accordance with the Distribution System Code and any order or orders issued by the Ontario Energy Board that apply.

- 10. If the proposed amendment is granted, would new customers in the expanded service area have a choice of distributor? If yes, and some customers chose Centre Wellington and some customers chose Hydro One, would two distribution systems be built? Please describe the way that choice would be provided to customers. Please discuss this aspect of the proposal with reference to the fourth electricity objective in the OEB Act: promote economic efficiency in the ...distribution of electricity.
 - I1.10. 10. New customers may have a choice of distributor. This is dependent on the costs associated with servicing new customers (individually, or via subdivision, etc. Our interpretation of a "new customer" would be a commercial, industrial, institutional, enterprise, or a developer. New customers for the purpose of this Application do not include individual residential customers within a new development. It is unlikely there would be any need whatsoever to build two distribution systems. As far as CWH is concerned, customers would be connected to the distribution system of the existing LDC.

Concerning the fourth objective in the OEB Act concerning economic efficiency, this reference is in terms of customers having the opportunity and right to choose a supplier of distribution services where, in the opinion of the customer there is a choice to be made between LDCs that is economically efficient to the customer.

11. If the proposed amendment is granted, who would have the obligation to serve customers in the expanded service area? Could a scenario arise where both distributors have the obligation?

- I1.10.11 Either distributor could have the obligation to serve customers in the expanded service area and this would likely depend on such factors as which LDC's service is nearest to the customer to satisfy the customer's requirements.
- 12. Would the requested amendment have an impact on Hydro One or its customers? If yes, please describe.
 - I1.10.12. It is our belief that this amendment would not have a significant impact on Hydro One or its existing customers. Hydro One has an approved rate structure from the OEB that allows them the ability to recover their costs from existing customers.
- 13. Would the requested amendment have an impact on Centre Wellington or its existing customers? If yes, please describe.
 - I1.10.13. It is our belief that this amendment would not have a significant impact on CWH or its existing customers. CWH has an approved rate structure from the OEB that allows the LDC the ability to recover costs from existing customers.