

#### **OEB COST ALLOCATION REVIEW**

#### Project Objectives and Deliverables Bill Rupert Managing Director, Strategic Planning & Policy Development

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## Outline

- Project Team
- Purpose of Today's Meeting
- Background

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- Project Objectives
- Project Deliverables
- Future Rate Implementation
- Comprehensive Rate Design

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### **Project Team**

- Board Staff:
  - Kirsten Walli Project Manager
  - John Vrantsidis Project Co-Lead
  - Pascale Duguay Project Co-lead
  - Rose Deng Model Assistance
  - Harold Thiessen Rates Group Contact
  - Sarah Branco Administrative Support
- Consultants:
  - Neil Yeung
  - Gary Saleba, EES Consulting (USA)



#### Purpose of Today's Meeting

- Discuss the planned consultation process for the Cost Allocation Review
- Explain the scope of the topics list on each phase of the project





#### Background

- Updated cost allocation studies were not required when rates unbundled by OEB
- Chair's March 9<sup>th</sup> 2005 letter outlined Board's major rate-setting initiatives over the next few years
- Confirmed a review of cost allocation will proceed

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# Background (Cont'd)

- Revenue requirement sets reasonable size of pie
- Cost Allocation fairly divides pie between classes
- Rate Design fairness within class
- Rate Classification sets appropriate classes

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# **Project Objectives**

- Identify with greater certainty the actual share of costs for serving the different classes of customers
  - Will allow Board and stakeholders to ascertain extent of any cross-subsidization



# Project Objectives (Cont'd)

- March 9<sup>th</sup> 2005 letter advised cost allocation review to be based "primarily on the existing rate classifications and a limited number of rate design changes"
- Select potential rate classification changes:
  - Drop legacy class known as TOU
  - >Add new class scattered unmetered loads
  - Consider adding new class embedded distributors
  - Consider adding new class for larger GS customers





# Project Objectives (Cont'd)

- Collect information to allow subsequent review of fixed monthly service charge anomalies
  - Substantial changes to the fixed/variable distribution rate philosophy will be deferred



# **Key Project Deliverables**

- Board Report on Cost Allocation Methodologies and Principles (March 2006)
  - Conclusions will guide development of mandatory filing requirements and model finalization
- OEB mandatory filing requirements (July 2006)
- OEB cost allocation model (July 2006)

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#### **Future Rate Implementation**

 All distributors file new cost allocation studies (Fall 2006)

Informational filings

Board review of public informational filings



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# Future Rate Implementation (Cont'd)

- After considering the filing results and the overall regulatory context, the Board will decide upon the priorities for adjustments
- Certain distributors may be directed to address specified matters in their 2007 or future rate applications





### **Comprehensive Rate Design Study**

- Chair's March 9, 2005 letter announced separate comprehensive study of distribution rate design
- Discussion paper to be released 2006 Q1



#### Questions

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#### **OEB COST ALLOCATION REVIEW**

Consultation Process Kirsten Walli Manager, Strategic Services

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#### **Overview of Consultation Process**

- Submission on Planned Scope of Consultations
- Staff Discussion Paper
- Stakeholder Technical Workshop
- Technical Advisory Teams
- Stakeholder Comment on OEB Policy Proposals and Mandatory Filing Requirements

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#### Submission on Planned Scope of Consultations

- Timing: July 27, 2005 for distributors other than those required to file their 2006 EDR Application by August 2, 2005
- Timing: August 8, 2005 for distributors required to file their 2006 EDR Application by August 2, 2005





### **Staff Discussion Paper**

- Will identify major policy options and proposals
- Will guide initial discussions at the Technical Advisory Team
- Timing: September 2005





### **Technical Workshops**

 Objective: Provide broad stakeholder input on concepts under development by staff

 Attendance by all stakeholders
 Provides opportunity for parties not involved in Advisory Team to participate

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# **Technical Advisory Team**

- Objective: Provide technical input to Staff
- Extensive technical knowledge:
  - Prior cost allocation experience
  - Prior rate design experience
  - Accounting and engineering expertise
  - Representation from across the Province
  - Varying size utilities and consumer groups

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### **Consultation Phases**

- Phase 1: OEB cost allocation principles and methodologies
- Phase 2: Select rate design and rate classification matters
- Phase 3: OEB filing requirements, model design, and data inputs





## **Policy Proposals**

- Proposals to address:
  - OEB cost allocation principles and methodologies for electricity distributors
  - Select rate classification/design matters
  - Timing: January 2006
- Will be issued for written stakeholder comments



### **Implementation Proposals**

- Proposal on OEB mandatory cost allocation filing requirements to be issued for stakeholder written comment
- Timing: May 2006

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#### **Stakeholder Cost Awards**

- Board to decide on eligibility
- Costs to be awarded will be recovered from all licensed Ontario electricity distributors based on distribution revenues





#### Website

- See "Cost Allocation Review" page (under OEB Key Initiatives section)
- Consultation process will build upon previous work (see Load Data Collection Directions)
- 2000 Navigant Report to Board Staff on cost allocation methodologies (see Cost Allocation Load Data web page)

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#### **OEB COST ALLOCATION REVIEW**

#### Phase 1: OEB Cost Allocation Principles and Methodologies Pascale Duguay Senior Policy Advisor, Rate Development and Finance

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#### **Purpose of Cost Allocation**

- To allocate the costs to provide service (revenue requirement) to the various customer categories (rate classes) based on cost causation principles
- Serves as a guide for rate design
- Other principles or objectives may be considered by regulators when setting just and reasonable rates

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#### **Overview of Cost Allocation Process**

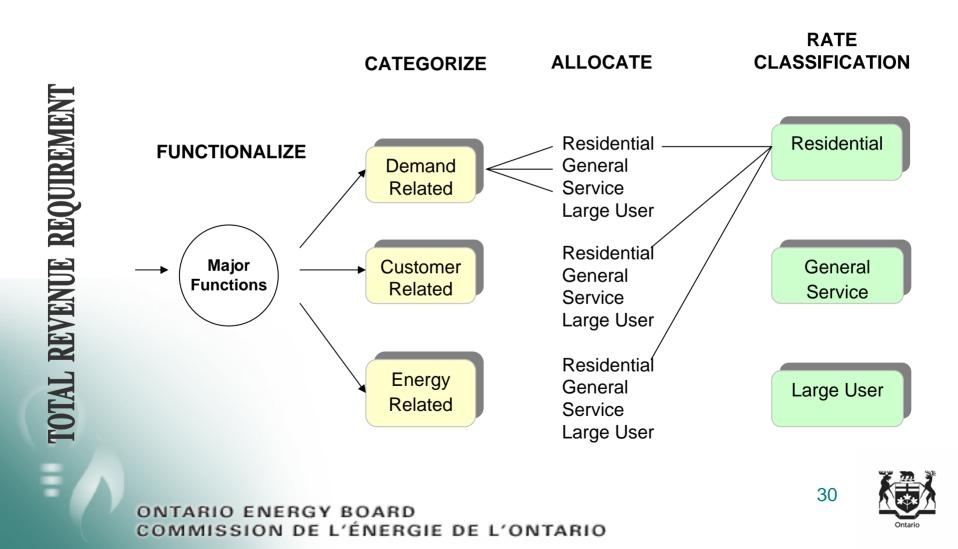
- Direct assignments
- Three-step process to allocate common costs:
   Functionalization
   Categorization
  - Allocation

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#### Overview of the Cost Allocation Process (cont'd)

#### MAJOR STEPS IN ALLOCATING COMMON COSTS



# **Directly Assignable Costs**

Costs that can be directly attributable to a specific rate class

Items for discussion:

- Identification of accounts: update prior list in Navigant 2000 Report
- Confirm accounting data availability

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### **Functionalization**

Grouping of costs into major functions

Items for discussion:

- Identification of major functional costs centres (e.g. distribution, metering, billing, customer service) and sub-functions (if applicable)
- Confirm data availability





#### Categorization

Separation of costs into sub-groups based on cost drivers

Items for discussion:

- Review account categorization
- Merits and scope of approaches to separate joint demand and customer-related costs (e.g. basic customer charge, minimum system, and zero intercept)



#### Allocation

Allocation of categorized costs to customer rate classes

Items for discussion:

- Merits of non-coincident peak (NCP) versus coincident peak (CP) to allocate demand-related costs
- Appropriate allocation factors for customerrelated costs (e.g. number of customers, number of bills)
- Data requirements and availability

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### **Allocation of Other Costs**

Residual costs (A&G, general plant, etc.) and other

Items for discussion:

- Appropriate basis of allocation for residual costs:
  - ✓ detailed analysis
  - ✓ composite allocation factors
  - Iabour ratios

CDM costs: discuss the methodology set forth in the 2006 EDR Handbook

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#### Load Data Requirements

Volumetric data required to allocate demand-related costs

Items for discussion:

- All distributors must have 12 months of load data available
- Need and methodology for weather normalization





### Proposed Technical Team Advisory Group Composition

• 4 ratepayer/public representatives:

AMPCO (Ken Snelson/Wayne Clark)
 LPMA and Energy Probe (Randy Aiken)
 Schools (Darryl Seal)
 VECC (Bill Harper)





### Proposed Technical Team Advisory Group Composition (Cont'd)

• 6 medium to small utility participants:

> Alliance of LDCs (Jim Richardson)
 > CNPI (Doug Bradbury)
 > Lakeland (Margaret Maw)
 > Milton Hydro (Don Thorne)
 > Waterloo North Hydro (Chris Amos)
 > Whitby Hydro (Ramona Abi-Rashed)





### Proposed Technical Team Advisory Group Composition (Cont'd)

• 7 large utility participants:

Brampton Hydro (Scott Miller)
Hydro One (Mike Roger)
London Hydro (Dave Williamson)
Ottawa Hydro (Jane Scott)
PowerStream (Bruce Bacon)
Thunder Bay Hydro (Cynthia Domjancic)
Toronto Hydro (Anthony Lam)





# **Consultation Schedule**

- Technical Advisory Team: up to 6 days (from September 19th to October 7<sup>th</sup>, 2005)
- Technical Workshop: 2 days (target dates: October 20-21, 2005)
- Written comments on proposals: February 2006





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### **OEB COST ALLOCATION REVIEW**

#### Phase 2: Select Rate Design and Rate Classification Matters John Vrantsidis Policy Advisor

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### Scope

• General Scope:

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- Examine select rate classification and rate design priorities
- Separate comprehensive study of distribution rate design pending





# Select Rate Classification and Rate Design

- Eliminating legacy rate class identified as "Time of Use"
- Adding a new rate class for scattered unmetered loads
- Consider adding a new rate class for host distributors to charge embedded distributors

Items for discussion:

- Need for and implications of above
- Associated rate design issues

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### Select Rate Classification and Rate Design (Cont'd)

 Consider adding a new class for GS customers between 50 kW and 5000 kW

Items for discussion:

- Pros and cons of common kW boundary for larger GS class
- Identify fixed/variable split anomalies for larger GS customers

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# Monthly Service Charges

Gather underlying cost data to assist identifying lacksquaremonthly service charge anomalies

Items for discussion:

Lowest, highest and average fixed monthly service charge for various classes





# **Out of Scope Issues**

Present consultations will defer discussions on:
 Density/seasonal/polyphase/TOU rates
 Smoothing of rate classification boundaries
 Substantial changes to fixed/variable rate philosophy





### Proposed Technical Team Advisory Group Composition

• 4 ratepayer/public representatives:

> AMPCO (Ken Snelson/Wayne Clark)
 > CCC (Julie Girvan)
 > LPMA and Energy Probe (Randy Aiken)
 > VECC (Bill Harper)





### Proposed Technical Team Advisory Group Composition (Cont'd)

• 6 medium to small utility participants:

Alliance of LDCs (Jim Richardson)
 Bob Mason Associates (Bob Mason)
 Chatham-Kent Energy (Jim Hogan)
 CNPI (Doug Bradbury)
 ECMI (Roger White)
 Milton Hydro (Don Thorne)





### Proposed Technical Team Advisory Group Composition (Cont'd)

- 7 large utility participants:
  - Enersource
  - Horizon Utilities (Dan Graphic)
  - >Hydro One (Mike Roger)
  - Kitchener-Wilmont Hydro (Margaret Nanninga)
  - Ottawa Hydro (Jane Scott)
  - PowerStream (Bruce Bacon)
  - Toronto Hydro (Anthony Lam)

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### **Consultation Schedule**

- Meet for up to 6 days (from November 1 to November 18, 2005)
- 1-day Technical Workshop (target date: December 9, 2005)

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### **OEB COST ALLOCATION REVIEW**

#### Phase 3: OEB Filing Requirements, Model Design and Data Inputs John Vrantsidis Policy Advisor

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### Scope

- General Scope Phase 3:
   Filing requirements and model implementation issues
- Timing: March July 2006
- Implementation proposals to be consistent with Board's Report on Cost Allocation Principles and Methodologies (to be issued March 2006)

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# Filing Requirements

 OEB cost allocation review filing requirements (applicable to all LDCs)

Key items for discussion:

- Ensure Board obtains suitable information to review class cost to revenue ratios, and fixed/variable charge anomalies
- Confirm data generally available for mandatory requirements

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# Load Data Requirements

• See Board Directions November 10, 2003

Item for discussion:

Confirm distributors obtaining updated load data for their various rate classes



### **Reference Period**

Item for discussion:

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Which year(s) of financial data will be used in the Fall 2006 cost allocation review filings

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# Filing Requirements/Model Inputs

Items for discussion:

- Identify all data required for the filings
- Level of accounting data input
- Source of data when a distributor outsources



# Filing Requirements/Model Outputs

Items for discussion:

- What outputs are required to review class cost allocations (e.g. revenue to cost ratios)
- What outputs will help identify fixed monthly service charge anomalies





# **Rate Classification Changes**

Adding or dropping a class

Item for discussion:

Explain how the filing requirements and model apply when a rate classification change is proposed





### **Use of New Board Model**

Item for discussion:

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Are there any technical reasons that preclude filing of the new Board cost allocation model by all utilities?





## **Consultation Schedule**

- Technical Advisory Team: up to 5 days (during second to fourth week March 2006)
- Technical Workshop: 1.5 days (target dates: April 13-14, 2006)





# Testing

- Working draft of OEB model will be ready for Phase 1 Technical Workshop
- Waterloo North and Newmarket have agreed to test the first draft of new cost allocation model
- Completion: by early January 2006





# **Draft Filing Model**

- 2nd draft to be presented at April 2006 Technical Workshop
- Three utilities of varying sizes to test:
   Horizon Utilities
   Whitby Hydro
   Lakeland Energy



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# **OEB Model Finalization**

 New model to be introduced to stakeholders at wrap-up meeting (target date: late July 2006)

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