

**RÉPONSES DE L'AQCIE/CIFQ À LA DEMANDE DE RENSEIGNEMENTS N° 1 DE LA RÉGIE**

Le 20 novembre 2014

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**RÉPONSES DE L'AQCIE/CIFQ  
À LA DEMANDE DE RENSEIGNEMENTS #1  
DE LA RÉGIE DE L'ÉNERGIE**

**Le 20 novembre 2014**

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**RÉNUMÉRATION DES COMPTES D'ÉCARTS ET DE REPORT****1. Référence :** Pièce C-AQCIE-CIFQ-0021, p. 15.**Préambule :**

*« Normally the balance in deferral accounts should net out to zero, so the balance is essentially temporary working capital. However, occasionally there are special cases where the balance becomes so large it cannot be allocated to rates for the following year, instead it is amortised over several years. This is the case with the \$380 million balance in the deferral account in question. In these cases, instead of using the BA + 0.25 % rate I would recommend using the rate equal to the average maturity expected of the deferral balance. In the case of the \$380 million balance with an average maturity of about 3 years, I would recommend a three year rate. The current yield on the three year Government of Canada benchmark bond is 1.13 %. To this I would add 0.45 % to bring it to an HQD rate of 1.58 % or rounding up 1.60 %. »*

**Demandes :**

- 1.1 Dans le cas d'un compte d'écarts et de report amorti sur 5 ans, veuillez présenter les avantages et désavantages respectifs de l'adoption d'un taux d'intérêt à 3 ans, basé sur l'échéance moyenne du compte, et de l'adoption d'un taux d'intérêt à 5 ans, basé sur la période d'amortissement totale du compte. Veuillez commenter.

**Réponse :**

- 1.1 **Different bonds with the same maturity have different effective (value weighted average) maturities or duration. Only for a five year zero coupon bond is the maturity the same as its duration. Assuming a balance which is amortised over five years the effective maturity of the proposed \$380 million deferral is less than five years and closer to three. Conceptually, the correct rate is that based on effective maturity or duration. This is equivalent to financing with five zero coupons or discount notes: one for each of the annual payments of \$79.34 in the example on page 6 of Dr. Booth's testimony. In practise this level of accuracy may not be necessary at the current point in time (17 November 2014) since one year Government of Canada Treasury Bill yields are 0.98%, two year rates 1.0%, three year rates 1.13% and five year rates 1.51%. So the ‘error’ in using a five year rate is only 0.37% more than a three year rate. One advantage of using a three or five year rate is that they are benchmarks and more objective than trying to estimate duration and then matching that to a current yield. Note the Bank of Canada publishes yield curves for zero coupon bonds, so in theory they could be used but a disadvantage is that they are published with a three month lag.**

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**Note that Dr. Booth's estimate of the duration or average maturity of the balance in the deferral account is at the start of the recovery period. The longer this is deferred the higher the weighted average maturity.**

- 1.2 Veuillez préciser si, selon la recommandation du Dr. Booth d'utiliser un taux correspondant à l'échéance moyenne du compte, le taux d'intérêt applicable changerait chaque année avec la réduction graduelle de l'échéance moyenne du solde à amortir. Veuillez expliquer, à l'aide d'un exemple, quel pourrait être le taux applicable pour chacune des 5 années d'un compte amorti sur 5 ans. Veuillez fournir les données de référence utilisées.

**Réponse :**

- 1.2 **Dr. Booth's recommendation of a three year rate is based on the entire balance being allowed that rate for each year and would not change as the balance is reduced.**
- 1.3 Veuillez présenter les avantages et les inconvénients à utiliser les taux d'intérêt courants sur les obligations du gouvernement du Canada par rapport à ceux d'utiliser une prévision de taux pour l'année témoin.

**Réponse :**

- 1.3 **Generally it is best to use forecast financing rates, but in this instance it was not clear to Dr. Booth when the balance would start to be recovered, so the recommended rate is based on current rates, but the basic recommendation is for a three year rate if the balance is amortised over five years. Note that consensus forecasts do not normally forecast three year rates, but the current shape of the term structure of interest rates does not indicate significant changes in the near term.**
- 1.4 Veuillez identifier la série utilisée, aux fins de votre recommandation, pour les obligations du gouvernement du Canada 3 ans et veuillez fournir les données historiques mensuelles depuis le 31 décembre 2009. Veuillez fournir le fichier Excel.

**Réponse :**

- 1.4 **Provided in Booth Regie 1.4.xls. This is the three year benchmark bond series V122539.**
- 1.5 Veuillez expliquer comment la prime de 0,45 % par rapport au taux des obligations 3 ans du gouvernement du Canada a été établie.

**Réponse :**

- 1.5 **The spread over the Government of Canada benchmark varies with the maturity of the obligation. The three year premium of 0.45% was based on two main factors: the 0.25%**

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**premium over the BA rate allowed by the Ontario Energy Board and the premium of 0.20% of BA rates over equivalent Treasury Bill yields.**

- 1.6 Veuillez fournir les données historiques mensuelles quant au taux d'intérêt des obligations 3 ans d'Hydro-Québec en dollars canadiens, depuis le 31 décembre 2009. Veuillez fournir le chiffrier Excel.

**Réponse :**

- 1.6 Dr. Booth does not have this data otherwise he would have used it to estimate the appropriate spread directly. Generally, only investment dealers have this sort of data.**

- 1.7 Veuillez préciser si la prime suggérée de 0,45 % varierait en fonction des échéances différentes entre 1 et 5 ans. Si oui, veuillez préciser quelle serait la prime suggérée par le Dr. Booth pour des échéances de un, deux, trois, quatre et cinq ans. Veuillez expliquer comment ces primes sont déterminées et fournir les données de référence utilisées. Sinon, veuillez justifier.

**Réponse :**

- 1.7 Dr. Booth would recommend the use of a spread of 0.45% regardless of the term up to 5 years. As the answer to 1.1 above indicates the base long Canada bond yield out to five years only increases by 0.53%. In addition the HQ floating rate notes are for five years, even though the interest rate floats with CDOR. That is, the spread is just 0.14% over essentially the overnight rate. Beyond 5 year the spreads gradually increase to typically about 0.60% for an AA rated entity.**

- 1.8 Dans le cas d'un compte d'écart et de report amorti sur 3 ans, quelle serait la recommandation du Dr. Booth quant au taux de rendement approprié pour ce compte. Veuillez commenter et fournir le détail des données de référence utilisées tel que fourni à la réponse 1.4 et 1.6.

**Réponse :**

- 1.8 The approximate duration if the balance is amortised over three years is 2 as shown below:**

	1	2	3
Principal	380.00	255.15	128.49
Interest	5.51	3.70	1.86
Payment	130.36	130.36	130.36
Close	255.15	128.49	0.00
PV factors	0.9857072	0.9716188	0.957732
380	128.49446	126.65792	124.8476
1.990403	0.3381433	0.6666206	0.985639

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**Since interest rates are so low we can always check by assuming a zero interest rate in which case the present value of each equal payment is the actual value of the payment. As a result, the effective maturity or duration is simply 1/3 of the year of each payment or 1/3 of 1.0 + 1/3 of 2.0 + 1/3 of 3.0 or an effective maturity of 2.0 years. Given that 2 year Government of Canada bonds have yields of 1.0% with 3 year at 1.13% shortening the amortisation period would change Dr. Booth's recommendation by about 13 basis points.**

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- 2. Références :**
- (i) Décision BCUC G-110-12, FortisBC inc. 2012-2013 Revenue Requirements and Review of 2012 Integrated System Plan, p. 105;
  - (ii) Pièce B-0089, p. 6;
  - (iii) Pièce B-0070, p. 16.

**Préambule :**

- (i) Dans sa décision G-110-12, la BCUC affirme que :

*« Normally, a utility, whether a Crown corporation or shareholder-owned, is not entitled to receive a return on operating costs or current period charges but simply recovery of those amounts from its ratepayers, assuming recovery is otherwise justified. Current period charges are not “investments” which attract a capital return, they are deferred operating costs/current period expenses which, as noted above, in the Panel’s view, should not attract rate base rate of return. »* [nous soulignons]

- (ii) Concentric affirme que :

*« Rate of return regulation assumes that every dollar of capital investment is financed in accordance with the firm’s capital structure at the associated weighted average costs. »*

- (iii) Dans sa réponse à la question 5.2 le Distributeur affirme que :

*« Si la Régie n’avait pas autorisé la création de ces comptes d’écart, les coûts engagés dans une année donnée auraient été constatés aux résultats réels de l’année en cours, affectant ainsi le rendement du Distributeur présent dans son rapport annuel. »*

**Demandes :**

- 2.1 Veuillez indiquer si le Dr. Booth est d'accord ou non avec les énoncés soulignés à la référence  
(i) Veuillez commenter.

**Réponse :**

- 2.1 Dr. Booth would accept the decision of the BCUC that current period charges are not “investments” which attract a capital return.**

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2.2 Veuillez commenter l'affirmation faite à la référence (ii).

**Réponse :**

- 2.2 Dr. Booth accepts this statement as a tautology. At any point in time it is possible to look at the rate base and finance the rate base at the appropriate cost of capital. In the case of HQD the Regie set the capital structure and ROE consistent with the underlying business risk and capital market conditions at that time, when the rate base was largely capital investment, that is, plant and equipment. Since then HQD has assumed a new low risk asset, which is the special treatment of the \$380 million it proposes. If the Regie allows this regulatory asset it could simply lower the allowed ROE or change the capital structure in light of the overall lower risk now faced by HQD. However, conceptually this would mean changing, for example, the allowed ROE each year as the deferral account is amortised, which in Dr. Booth's view is overly complex. It is better to simply treat the deferral account as a "one off" special treatment of a deferral account with its own fair rate of return.
- 2.3 Veuillez définir ce que constitue un « capital investment » en donnant des exemples de ce qui peut être inclus et de ce qui ne peut pas être inclus. Veuillez préciser si une dépense d'opération peut-être considérée comme un « capital investment ». Dans l'affirmative, veuillez expliquer.

**Réponse :**

- 2.3 Dr. Booth interprets capital investment in the Concentric quote as synonymous with the rate base. However, capital investment would normally mean plant and equipment. One would not normally think of a deferred expense as capital investment.

2.4 Veuillez préciser si les coûts engagés dans une année donnée, tels qu'énoncés à la référence (iii), mais recouvrés une année subséquente, peuvent répondre à la définition de « capital investment ». Veuillez expliquer.

**Réponse :**

- 2.4 Dr. Booth views the referenced statement as simply reflecting the use of normal deferral accounts, that is, that significant events that would otherwise affect HQD's earnings are put into a deferral account to be recovered from future rate-payers as a regulatory asset. Dr. Booth would not regard this regulatory asset as capital investment as normally defined. As Dr. Booth mentions this \$380 million balance could be sold to a specialised financing company and the costs subsequently included in customer rates.