

IN THE MATTER OF the Ontario Energy Board Act
1998, S.O. 1998, c. 15, (Schedule B);

AND IN THE MATTER OF an Application by Hydro One
Networks Inc. for an Order or Orders approving or fixing
just and reasonable rates and other charges for the
transmission of electricity commencing January 1,
2009.

INTERROGATORIES
OF THE
SCHOOL ENERGY COALITION
TO
AMPCO

1. Ref. Expert Report of Anindya Sen
 - (a) Pg. 4: Professor Sen used HOEP as the major independent variables for his study. How do Professor Sen's elasticity results apply to transmission rates as opposed to HOEP rates?
 - (b) Pg. 4: why do the Motor and Petrol industries show a positive elasticity of demand (3.4% and .1% respectively) for current HOEP rates?
 - (c) How are Professor Sen's analysis affected by the fact that the HOEP rate is itself a function of overall demand in Ontario, which may suggest that the independent variable in his analysis is actually the dependent variable?
2. Assuming HOEP rates remain constant, does AMPCO have an estimate of the anticipated savings to industrial customers (or other customers who are able to shift their demand away from peak) resulting from its proposal?
3. Does AMPCO agree that, again assuming HOEP rates remain constant, the savings to industrial customers (or other customers who are able to shift their demand away from peak) means an increase for other customers?
4. Ref. Pg. 16-17 of AMPCO main evidence (Implications for Other Transmission Customers):

- (a) Does AMPCO have an estimate of the anticipated savings to all customers that would result if its proposal were accepted and the ensuing change in transmission rates results in a decrease in the HOEP rate?
- (b) In particular, can AMPCO state whether these savings are likely to be greater than the cost of AMPCO's proposal to customers who cannot shift their consumption away from peak?