

IN THE MATTER of the *Ontario Energy Board Act 1998*,
Schedule B to the *Energy Competition Act, 1998*, S.O. 1998,
c.15;

AND IN THE MATTER OF an Application by Toronto Hydro
Electric System Limited for an Order or Orders approving
leave to sell streetlighting assets and leave to amalgamate.

INTERROGATORIES
FROM THE
SCHOOL ENERGY COALITION

1. [Additional Evidence, p. 4] Please confirm that the Inventory Study has not been filed. If it has been filed, please provide the reference. If it has not been filed, please provide the Executive Summary or similar document.
2. [p. 13] Please confirm that all Connector and Arterial Roads have bus routes. If they do not, please advise the percentage (by length) of those roads that have bus routes.
3. [p. 19] Please confirm that, for all categories of assets, NBV was assumed to be 64% of fair market value. Please advise the basis of this assumption. Please advise all tests or other methods of verification used to confirm that for each category of assets NBV was equal to 64% of fair market value.
4. [Valuation, p. 16] Please provide a detailed calculation of the amount of “burden” that is included in the \$29.4 million amount of rate base proposed to be added for the distribution company in this application. Please provide evidence that none of this burden has been included in distribution rates in prior years.
5. [Valuation, p. 19] Please confirm that, based on the methodology used in the Application, the minimum net book value of each asset for the purposes of the transfer to regulated rate base is 6.4% of replacement cost (i.e. 64% of 10% of replacement cost).
6. [Valuation, p. 26] Please confirm that, based on the methodology used, the average fair market value of all poles is 29.7% of their replacement cost. Please describe all

tests or other methods of verification used to confirm that this ratio is reasonable or correct.

7. [Valuation, p. 45] Please confirm that, for the concrete poles the replacement cost is estimated at \$99.3 million, the depreciated replacement cost is estimated at \$29.6 million, the net book value is estimated at \$18.9 million, and the net book value allocated to distribution rate base is estimated at \$14.0 million. If these figures are materially incorrect (i.e. more than \$1 million off in either direction for any of these estimates), please provide more reliable estimates and the calculations supporting them.

Submitted on behalf of the School Energy Coalition this 8th day of March, 2011.

Jay Shepherd
Counsel for School Energy Coalition