



## Jay Shepherd

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### **BY EMAIL and RESS**

November 13, 2012

Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> Floor  
Toronto, Ontario  
M4P 1E4

### **Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

### **Re: EB-2012-0145 – Lakeland – Interrogatories**

Please find attached the interrogatories of the School Energy Coalition (SEC) in the above-noted proceeding.

Should you require additional information, please do not hesitate to contact me.

Yours very truly,

*Originally signed by*

Mark Rubenstein

cc: Applicant and Intervenors (by email)

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**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 Lakeland  
Power Distribution Ltd. for an Order or Orders approving just  
and reasonable distribution rates and other service charges for  
the distribution of electricity, effective May 1, 2013.

**INTERROGATORIES**

**ON BEHALF OF THE**

**SCHOOL ENERGY COALITION**

**1-SEC-1**

Please confirm that there are 16 schools in the Applicant's franchise area. Please advise the number of schools in each of the GS<50 and GS>50 classes.

**1-SEC-2**

Does the Applicant have a long-term or strategic plan that includes the Test Year? If so, please provide a copy.

**1-SEC-3**

Please provide a copy of the current approved dividend policy of the Applicant, and any communication from the shareholder requesting, directing, or approving that policy.

**1-SEC-4**

Please provide a copy of all materials provided to the Board of Directors in approving the Applicant's rate application and corresponding budgets.

**2-SEC-5** [Ex. 2/Tab 3/ Sch. 2/p.3]

Please update the table to provide a column for 2012 year-to-date actuals expenditures.

**2-SEC-6** [Ex. 2/Tab 3/ Sch. 2/p.3]

For all 2012 forecasted capital expenditures that have not come in-service to date, please provide details of when they will come into service.

**2-SEC-7** [Ex. 2/Tab 3/Sch. 2/p.5]

With respect to the expansion of the operation facility:

- a. What was the square footage of the building before and after expansion?
- b. Please provide a copy of the RFP.
- c. How did the Applicant determine how much and what type of space was required?

**2-SEC-8** [Ex. 2/Tab 3/Sch. 3/p.1]

What is the Applicant's approval process for capital projects? Does the Applicant require a formal business cases or economic justification to be prepared? If so, please provide the documents for each proposed capital project included in the application.

**2-SEC-9** [Ex. 2/Tab 3/Sch. 3/p.1]

How does the Applicant prioritize capital projects? Please provide a prioritization for the proposed Test Year capital projects.

**2-SEC-10** [Ex. 2/Tab 5/Sch 3/p.2]

Please explain why the Applicant is proposing a disposition period of four years for the PP&E deferral account which has a balance of only \$74,116.

**4-SEC-11** [Ex. 4/Tab 1/Sch.1/p.4]

Please explain the difference between the 2009 Board Approved and actual FTEE number?

**4-SEC-12** [Ex. 4/Tab 2/Sch.2/p.1-3]

Please update tables 4.2.1 through 4.25 to provide a column for year-to-date actual expenses.

**4-SEC-13** [Ex. 4/Tab 2/Sch. 4/p.1]

Please provide a copy the Applicant's collective agreement with its union?

**4-SEC-14** [Ex. 4/Tab 2/Sch. 4/p.1]

Since the Applicant's collective agreement with its union ends on June 30<sup>th</sup> 2013, what percentage increase in compensation is the Applicant forecasting in this Application for its next collective agreement? Which LDCs does the Applicant believe it competes with directly for labour?

**4-SEC-15** [Ex. 4/Appendix A/p.10]

Please reconcile the cost allocation percentages set out on p.10 of the Affiliate Services Agreement with the information in Appendix 2-N.

**5-SEC-16** [Ex. 5/Tab 1/Scd. 1/p.2]

Please provide a copy of all outstanding debt instruments?

**6-SEC-17** [Ex.6/Tab 1/Appendix A]

Please provide a copy of the RRWF in CGAAP

Submitted by the School Energy Coalition on this 13th day of November, 2012.

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Mark Rubenstein  
Counsel for the School  
Energy Coalition