

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B, as amended (the “OEB Act”);

**AND IN THE MATTER OF** an Application by Alectra Utilities Corporation to the Ontario Energy Board for an Order or Orders approving or fixing just and reasonable rates and other service charges for the distribution of electricity as of January 1, 2018.

**SUPPLEMENTARY INTERROGATORIES**

**OF THE**

**SCHOOL ENERGY COALITION**

G-SEC-18

[G-AMPCO-1, p. 2] Please explain why storm hardening is required in the Powerstream RZ, but not in the other three rate zones.

G-SEC-19

[CCC-1] Please confirm that the Board of Directors of Alectra has not approved the Application.

G-SEC-20

[CCC-1, Attach 1, p. 14] Please describe in detail the “different application approach” decided on for the Enersource and Powerstream RZ.

G-SEC-21

[CCC-1, Attach 2, p. 3] Please provide the Alectra 2017-2021 Business Plan referred to.

G-SEC-22

[CCC-1, Attach 4, Table 10 and G-SEC-1] Please explain how the Schedule in Table 10 reported to the Board of Directors Committee is consistent with the answer to G-SEC-1.

Please confirm that the Applicant did not expect to have a rate order for January 1, 2018 given a July 7<sup>th</sup> filing date.

G-SEC-23

[CCC-18] Please provide the estimated 2017 regulatory ROE, together with the full calculation and assumptions supporting the number.

G-SEC-24

[CCC-18] Please explain how disclosing merger savings to customers would “cause a degree of confusion”.

G-SEC-25

[G-SEC-5] Please provide all budgets, estimates or forecasts of capital spending for each of the years 2019-2026. Please advise whether it is reasonable for the Board to assume that the Applicant will have ICM applications with a similar level of impact each year, with a total incremental rates over the deferral period of more than \$200 million.

HRZ-SEC-26

[HRZ-SEC-6] Please explain how the Applicant proposes to credit the ratepayers for the increased annual capitalization, and reduced operating costs, each year into the foreseeable future.

BRZ-SEC-27

[BRZ-Staff-6] Please provide a status update with respect to the downtown core revitalization project that was supposed to start mid-2017.

PRZ-SEC-28

[PRZ-AMPCO-1] Please explain how the Applicant expects to reach its General Plant target expenditures in 2017 given its August YTD figure.

PRZ-SEC-29

[PRZ-AMPCO-4] Please explain why the advancement of the CIS expenditure to 2017 will not result in a stranded asset. If the reason is that the proposed expenditure will become the CIS standard for Alectra, please provide a copy of the merger business case for that standardization.

PRZ-SEC-30

[PRZ-AMPCO-10, p 2] Please extend Table 1 to include 2010-2014 inclusive.

PRZ-SEC-31

[Ex. 2/3/10, p. 11] Please explain how the acceleration of the CIS project into 2017 is not merger-related spending. Please calculate, on a cost of service revenue requirement basis, the impact of that project in each of 2017, 2018, and 2019, including all tax shelter impacts.

PRZ-SEC-32

[PRZ-Staff-5] Please provide the “assessment” referred to in (a), including all supporting assumptions, estimates and calculations.

PRZ-SEC-33

[PRZ-SEC-13] Please explain why the CIS project was not included as one of the ICM projects.

PRZ-SEC-34

[PRZ-SEC-14] Please advise the percentage of overhead lines (by line length) in 2013 that were in rear lot grids.

PRZ-SEC-35

[3.0-VECC-16] Please respond to the question of how benchmarking was used.

ERZ-SEC-36

[ERZ-AMPCO-7] Please confirm that the cable failure rate did not include any adjustment for the age of the cables. If confirmed, please explain how the 4.8% tells the Applicant anything about jacketed cable failures vs. other cable failures.

ERZ-SEC-37

[BOMA-56, p. 2] Please clarify that the last sentence is not intended to convey the message “If the Board doesn’t approve our ICM request, we will allow our SAIDI to deteriorate”.

ERZ-SEC-38

[CCC-1, Attach 2, p. 5] Please explain why the 2020-2022 spending estimates are in almost every case identical to the 2019 spending estimate.

ERZ-SEC-39

[ERZ-Staff-20, p 2] Please provide the materiality calculation for the Applicant as a whole, rather than each individual RZ.

ERZ-SEC-40

[ERZ-Staff-20, p 2] Please provide the full calculation of the ERZ regulatory ROE, cited as 6.13%, including all assumptions with respect to the components of the revenue requirement.

ERZ-SEC-41

[ERZ-Staff-22] Please identify where the appropriate timing and pacing of spending is factored into the scoring mechanism described.

ERZ-SEC-42

[ERZ-Staff-23] Please identify in the evidence the support for the phrases “based on the latest information from builders and developers” and “based on discussions with Metrolinx and the City of Mississauga”.

ERZ-SEC-43

[ERZ-Staff-26, p 2] Please advise the number of outages in the last five years related to cable failures for each of the subdivision rebuilds included in the 2018 capital plan.

ERZ-SEC-44

[ERZ-Staff-49] Please advise whether it is correct to conclude that the planned multi-year spending on leaking transformers will avoid more than \$100 million of environmental remediation costs.

ERZ-SEC-45

[ERZ-Staff-57] Please explain the answer to part (a), which does not appear to be responsive to the question.

ERZ-SEC-46

[ERZ-Staff-76] Please advise the number of heat shrink splices in each of the Applicant's rate zones, and the number that the Applicant plans to replace in each year until the end of the deferral period.

Submitted on behalf of the School Energy Coalition this October 24, 2017.

---

Jay Shepherd  
Counsel for the School Energy  
Coalition