



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

November 13, 2017
Our File: EB20170056

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2017-0056 – KWHI 2018 – SEC Interrogatories

We are counsel to the School Energy Coalition ("SEC"). Pursuant to Procedural Order No. 1, please find SEC's interrogatories.

Yours very truly,
Shepherd Rubenstein P.C.

Original signed by

Mark Rubenstein

cc: Wayne McNally, SEC (by email)
Applicant and interested parties (by email)

ONTARIO ENERGY BOARD

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 Kitchener-Wilmot Hydro Inc. to the Ontario Energy Board for an Order or Orders approving or fixing just and reasonable distribution rates and other service charges to be effective January 1, 2018.

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

SEC-1

[p.11] Please file the evidentiary record of proceedings EB-2014-0089 and EB-2015-0084. [Note: It is sufficient for SEC's purposes for the Applicant to agree to simply deem all materials filed in EB-2014-0089 and EB-2015-0084 as part of the record in this proceeding].

SEC-2

[p.11] Please provide a copy of the audit.

SEC-3

[p.11-12] For each error, please provide a detailed explanation, including but not limited to, references individual spreadsheets, files, processes, staff members responsible (by position not name), dates the errors occurred etc.

SEC-4

[p.11-12] For each of the errors, please explain what the Applicant has done to ensure similar error will not occur in the future.

SEC-5

[p.11-14] Please provide the Applicant's actual or forecast ROE for each year between 2013 and 2018, both as a percentage and the amount.

SEC-6

[p.12-14, Table 3-5] Please confirm that in each of the tables, negative numbers represents credits (i.e. amounts that are owed/should have been owed from the Applicant to ratepayers).

SEC-7

[p.14, Table 5] If the adjustment amounts set out in Table 5 were collected/refunded by way of a separate rate rider, for each rate class, please provide the rate.

Respectfully submitted on behalf of the School Energy Coalition this November 13th, 2017.

Original signed by

Mark Rubenstein
Counsel for the School Energy Coalition