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November 19, 2009

**Delivered by E-mail and Courier**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, Ontario M4P 1E4

Dear Ms. Walli:

**Re: OEB File No. EB-2009-0063**  
**Brant County Power Inc. ("BCPI") Review Motion – Ontario Energy**  
**Board Order for Brantford Power Inc. 2008 Electricity Distribution Rates**  
**and Charges**

We are counsel to Brantford Power Inc. ("BPI") with respect to the above-captioned matter. Please find accompanying this letter two hard copies of BPI's Interrogatories directed to BCPI in this matter.

Should you have any questions or require further information, please do not hesitate to contact me.

Yours very truly,

**BORDEN LADNER GERVAIS LLP**

*Original Signed by James C. Sidlofsky*

**James C. Sidlofsky**  
JCS/ac

Encls.

cc: G. Mychailenko, BPI  
H. Wyatt, BPI  
N. Butt, BPI  
K. Mitchell, BPI  
S. Stoll, Aird & Berlis LLP  
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Intervenors of Record (Sent by electronic copy only)

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Vancouver  
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Toronto  
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Ottawa  
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Montréal  
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Calgary

**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 Brantford Power Inc. 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 May 1, 2008 (EB-2007-0698);

**AND IN THE MATTER OF** a Motion by Brant County Power Inc. to review and vary the implementation of the Board's Interim Order dated April 21, 2008 in the rates proceeding;

**AND IN THE MATTER OF** a Motion by Brant County Power Inc. to review and vary the implementation of the Board's Decision dated July 18, 2008 and the Board's Order dated August 29, 2008 in the rates proceeding

**INTERROGATORIES SUBMITTED BY BRANTFORD POWER INC.  
TO BRANT COUNTY POWER INC.**

**DELIVERED NOVEMBER 19, 2009**

**Responding Party**

Brantford Power Inc.  
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**TO:**

**THE ONTARIO ENERGY BOARD**

Kristin Walli  
Board Secretary  
Ontario Energy Board  
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**AND TO:**

**BRANT COUNTY POWER INC.**

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## INTERROGATORIES

1. For each of the following periods:

- January 1, 2006 to December 31, 2006;
- January 1, 2007 to December 31, 2007;
- January 1, 2008 to December 31, 2008; and
- January 1, 2009 to the most recent month available;

Brant County Power Inc. ["BCPI"] is requested to provide the following information:

- (a) What was BCPI's net income?
- (b) Please provide BCPI's total liabilities.
- (c) Please provide BCPI's equity component of those liabilities provided in response to (b).
- (d) Please provide BCPI's rate of return on equity, which should be the net income in (a) divided by (c).
- (e) Please provide BCPI's debt/equity ratio. The equity component of the ratio should be (c) divided by (b).
- (f) What was BCPI's cash position?
- (g) How much interest income did BCPI earn on its cash position?

2. For each month during the period of January 1, 2005 to the most recent month available, please provide the following information:

- (a) What were BCPI's approved Retail Transmission Rates – Network Service Rate, and Retail Transmission Rates – Line and Transformation Connection Service Rate?
- (b) What amounts did BCPI recover from customers for Retail Transmission – Network Services and Retail Transmission – Line and Transformation Connection Services?
- (c) What amounts did BCPI pay to various parties for transmission network and connection service (i.e. wholesale and retail)? Please list the amounts by party and connection point.
- (d) What amounts including interest did BCPI record in Account 1584 – RSVA - Network and Account 1586 – RSVA – Connection?

3. Is BCPI seeking to dispose of the amounts referred to in Question 2(d) above in its 2010 rate application?
4. Please confirm the service classification used by BCPI for the billing of BPI for distribution and transmission services at the Jennings Road connection point.