

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
THE SCHOOL ENERGY COALITION**

PART I: SEC INTERROGATORIES TO BRANTFORD POWER INC.

1. Please file a copy of the original Notice of Application in EB-2007-0698 along with the newspaper advertisement if different.
2. Please file the portions of the evidence from EB-2007-0698 pertaining to the change in status for Brant County Power Inc.
3. The Board's Rate Order in EB-2007-0698 states that the new rates were effective September 1, 2008. Please:
 - (a) advise whether new rates for Brant County were in fact charged as of May 1, 2008. If so, please explain why.
 - (b) set out the amount charged to Brant County from May 1 to September 1, 2008 that was in excess of the amount that should have been charged under the previous rate order.
 - (c) advise whether any other rate classes were charged new rates prior to September 1, 2008.

PART II: SEC INTERROGATORIES TO BRANT COUNTY POWER INC.

4. With respect to the Affidavit of Grant Gordon Brooker:
 - (a) Please provide greater detail regarding the discussions with Brantford Power Inc. in the summer of 2007. What in particular was Mr. Brooker and/or Brant County Power told about the application?
 - (b) During the discussions with Brantford Power was an approximate amount for the wheeling rate discussed?
 - (c) What did Brant County expect would be the amount of the wheeling rate?
 - (d) It appears from Brant County's evidence that it expected *some* impact to it from Brantford Power's application. Please explain then why Brant County Power did not review Brantford's application to determine the impact on Brant County?
 - (e) The email exchange at Exhibit "A" to the application ends with the message from Ms Wyatt stating "I'm sending your question back to George." Please explain whether any further reply was received and if so produce a copy.
 - (f) Please explain why the April 2008 invoice has been omitted from the exhibits and provide a copy if available.
5. For the most recent year for which actuals are available, please provide Brant County's total revenue requirement (including OM&A, return on rate base, PILS and depreciation).
6. Please explain the statement at para. 6 of the Amended Notice of Motion wherein it states that Brantford had "estimated costs (which went unchallenged) of only \$300,000 versus the \$462,755 per year that has actually been charged. Specifically:
 - (a) Please file a copy of the interrogatory response to Board Staff (Board Staff IR#10.3) in which the \$300,000 estimate is set out.
 - (b) When did Brant County Power first become aware of the \$300,000 estimate?
 - (c) does believe \$300,000 is the correct amount that it should be charged for the service provided by Brantford Power? If not, what does BCP state is the correct amount?
- 7.