



Jay Shepherd

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BY EMAIL and COURIER

November 2nd, 2010

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2010-0137 – Milton Hydro - Interrogatories

Please find attached the Interrogatories of the School Energy Coalition (SEC) for EB-2010-0137 pursuant to Procedural Order 1 issued by the Board on the 19th of October.

Sincerely,

Mark Rubenstein

cc: Applicant and Intervenors (by email)

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IN THE MATTER the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, (Schedule B);

AND IN THE MATTER OF an Application by Milton Hydro Distribution Inc. for an Order or Orders approving just and reasonable rates and other service charges for the distribution of electricity.

INTERROGATORIES
FROM THE
SCHOOL ENERGY COALITION

1. Please confirm that there are 15 publicly-funded schools in the Applicant's franchise area. Please provide a table showing the number of schools in each of the GS<50 and GS>50 classes.
2. [Ex. 1 p. 31] In regards to the Service Quality Indicators, please explain the drop of 6% from 2008 to 2009 in the Connections of New Services-Low voltage indicator.
3. [Ex. 1 p. 36] Please explain why the growth in total plant investment is increasing at a higher rate than both population and customer growth?
4. [Ex. 2 p. 47] Please provide the methodology for the estimation of new connections for the 2010 bridge year.
5. [Ex. 2 p. 50] Please provide evidence to support the valuation of \$700,000 of the proposed property for purchase.
6. [Ex. 2 p. 59] Please provide the business case and/or other documents that outline the rationale for the construction of a new office/service centre building.
7. [Ex 2/1 p.22] What are the corresponding capital investment priority levels (referenced on p.22 of the Asset Management Plan) to each of the planned capital investments contained in the Plan?
8. [Ex. 4 p. 16] Please explain the increase in the cost of maintenance of overhead conductors in the 2011 test year.
9. [Ex. 4 p. 46] Please provide a detailed breakdown of annual management fee expenses.

10. [Ex. 4 p.45] Please provide data on collections from 2004 to 2010.
11. [Ex. 4 p. 47] With respect to Rent as an OM&A cost driver:
 - a. Please provide the cost of per square footage at the end of the lease at 55 Thompson Rd. and the cost of the square footage currently at the 8069 Lawson Rd. facility?
 - b. Please provide the total industrial and office area square footage leased at the 8069 Lawson Rd. facility?
 - c. Please provide the rationale for selecting the 8069 Lawson Rd. facility to lease specifically?
12. [Ex. 4 p. 51] Please provide a detailed breakdown of the expected Training Costs associated with the upgrading version of Harris Billing in 2011.
13. [Ex. 4 p. 58] Please provide detailed criteria for the 'Personal Performance' area of the Incentive Plan. What would be some examples for each level?
14. [Ex. 4 p. 58] At the current time have any employees been evaluated on the new Incentive Plan? If so, how many? If so, please provide a breakdown of their performance measures? Please ensure that the information is aggregated sufficiently not to reveal individual evaluations.

Respectfully submitted on behalf of the School Energy Coalition this 2nd day of November, 2010