

IN THE MATTER of the *Ontario Energy Board Act 1998*, Schedule B to the *Energy Competition Act*, 1998, S.O. 1998, c.15;

AND IN THE MATTER OF an Application by West Perth Power Inc. for an Order or Orders approving just and reasonable rates and other service charges for the distribution of electricity, effective on July 1, 2010.

**SECOND ROUND INTERROGATORIES
OF THE
SCHOOL ENERGY COALITION**

1. [SEC #4] Please provide the term sheet as requested, or confirm that there was no term sheet and the transaction went directly to purchase agreement. Please provide schedules 1.1.10, 1.1.23(a), 1.1.47, 1.1.49, 1.1.60, 6.16, and 9.1.8 to the Share Purchase Agreement.
 - ***The term sheet is provided as 1_WPPI_Closing Agenda_Term Sheet.pdf.***
2. [SEC #5] Please provide 2010 as actuals to June plus forecast to December, as requested.

RATE BASE SUMMARY	2009 Actual	2010 Actual to September	2010 Actual Forecast
<u>Gross Asset</u>			
Asset Values at Cost	\$4,729,208	\$5,220,072	\$5,278,413
<u>Accumulated Depreciation</u>	-\$3,020,301	-\$3,185,100	-\$3,404,830
Depreciation			
Net Fixed Asset	\$1,708,907	\$2,034,972	\$1,873,583
<u>Allowance for Working Capital</u>			
	\$749,501	\$637,798	\$861,545
Utility Rate Base	\$2,458,408	\$2,672,770	\$2,735,127

3. [SEC #6] Please provide all business plan and budget presentations or other supporting information provided to the Board of Directors in the last twelve months.
 - ***Provided as WPPI Budget 2010.pdf.***

4. [SEC #8] Please advise how many people were directly employed by the Applicant in 2006, and how many are currently directly employed by the Applicant.
- **6 people were directly employed by WPPI in 2006 and 6 people are still employed currently.**
5. [SEC #9] Please provide a comprehensive table showing all amounts included in the Applicant's OM&A or capital that consist of payments to affiliates or partially owned subsidiaries of affiliates, identifying the affiliate paid, the basis for the payment, and the agreement under which the payment is made.
- **There are no costs in the Capital spend from any affiliates.**
 - **The following are the costs by affiliates in the OM&A:**
 - i. **ERTH: Rates and Regulatory (excluding rate application), accounting and President's remuneration \$168K**
 - ii. **Ecaliber: Billing printing, bill stuffing and printing \$70k**
 - iii. **Cru: Wholesale meter point \$10.5k**
 - iv. **E360: CDM, there is on rate impact on CDM as it is OPA funded**
6. [SEC #10] Please provide the table of numbers requested, plus the basis for each charge, the costs underlying each charge, and the service level agreement, all as originally requested.
- **ERTH: charges for accounting is based on a fee for service on an hourly rate estimated at \$36k. Rates and Regulator and the President are based on a flat fee of \$132K per annum**
 - **Ecaliber is at a rate of \$2.90 per customer**
 - **CRU solutions is for the operation and maintenance of the Wholesale meter point @ \$440 per meter point per month, there is one meter point in Mitchell and one in Dublin.**
 - **There are no costs in the application for E360 as they are funded by the OPA contract.**
7. [SEC #11] Please provide the table of numbers requested, plus the basis for each charge, the costs underlying each charge, and the service level agreement, all as originally requested. Please provide a list of officers and directors as requested.
- **The Directors and Officers are as follows:**

Barb McLean Chair
Gary Tobin Director
Jeff Pettit Director
Wally Curry President
Graig Pettit Treasure
Tyler Moore Company Secretary

8. [SEC #12] Please identify which titles represent employees of the Applicant, and which represent functions supplied by third parties, and in the latter case the costs associated with those functions, all as originally requested.
 - ***All of the above functions are supplied by third party personnel.***
9. [SEC #13] Please explain why the arrangement described is a lower cost. Please provide a copy of the agreement requested. Please provide the RFP, comparative analysis, and other documentation requested.
 - ***If the resource was not shared between the two companies then there would be a requirement for an additional person, this would lead to inefficiencies as stated in our initial response.***

Respectfully submitted on behalf of the School Energy Coalition this 19th day of October, 2010

Jay Shepherd
Counsel for the School Energy Coalition