

Jay Shepherd

Professional Corporation 2300 Yonge Street Suite 806, Box 2305 Toronto, ON M4P 1E4

BY EMAIL and RESS

December 10, 2010

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2010-0291 – Great Lakes Power Transmission LP - Interrogatories

Please find attached the Interrogatories of the School Energy Coalition (SEC) for EB-2010-0291 pursuant to Procedural Order #1 issued by the Board on the 17th of November.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

Originally signed by Mark Rubenstein

Mark Rubenstein

cc: Applicant and Intervenors (by email)

T. (416) 483-3300 F. (416) 483-3305

mark.rubenstein@canadianenergylawyers.com www.canadianenergylawyers.com **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 Great Lakes Power Transmission Inc. on behalf of Great Lakes Power Transmission LP for an Order or Orders pursuant to section 78 of the Ontario Energy Board Act, 1998 for 2011 and 2012 transmission rates and related matters.

INTERROGATORIES

FROM THE

SCHOOL ENERGY COALITION

1. [Ref: Exh. 2/Tab 1/Sch. 1/Page 8-9]

Please provide the business case or other background documents which provide for the rational for the Sackville Building HVAC replacement.

2. [Ref: Exh. 2/Tab 1/Sch. 1 Page 12]

With respect to the Asset Management System Enhancement:

- a) Please provide detailed information on how the total budget of \$480,400 was derived?
- b) Please provide detailed information on how the Applicant reached the apportionment of \$269,100 and \$211,300 for each part of the total project.
- c) What is the method of procurement for this project?
- 3. [Ref: Exh. 2/Tab 1/Sch. 1 Page 19]

With respect to the Master SCADA System Replacement:

- a) Please provide a copy of the SCADA feasibility study provided by BBA Engineering.
- b) How did the Applicant reach the estimation of a cost of \$3,818,500? Please provide detailed information to support the estimate.
- c) How will the Applicant determine when the new SCADA system is ready to operate on a stand-alone-basis? How long does the Applicant determine that both systems will need to be run in parallel?
- d) Please provide a breakdown of all revenue requirement impacts for 2011 and 2012 including but not limited to cost of capital, taxes/PILs and CCA deductions.
- [Ref: Exh. 2/Tab 1/Sch. 1/Page 21-22] How did the Applicant reach the estimation of a cost of \$387,900? Please provide detailed information to support the estimate?

- 5. [Ref: Exh. 4/Tab 2/Sch. 2/App. A/Page 4] Please provide this year's 'GLPT corporate performance' objectives.
- [Ref: Exh. 4/Tab 2/Sch. 2/App. A/Page 4-5] Please provide further detail explaining the 'specific working group performance measures'. How does one achieve a good or bad score in this area? Please provide examples.
- [Ref: Exh. 4/Tab 2/Sch. 3/Page 5] Please provide a detailed breakdown of executive services costs.
- 8. [Ref: Exh. 4/Tab 3/Sch. 4/Page 1] With respect to Property Tax:
 - a) Please provide a breakdown of which First Nations and the amount, the Applicant pays taxes to?
 - b) Please provide a breakdown of which municipalities and the amount, the Applicant pays taxes to?
- [Ref: Exh. 8/Tab 1/Sch. 1/Page 1-2] What impact does the Applicant forecast will occur because of the introduction of the *Ontario Clean Energy Benefit?* Please provide an updated load forecast to take the impact into account.
- 10. [Ref: Exh. 9/Tab 1/Sch. 3/Page 1]With respect to the Deferred Rate Impact Amounts, how will the implementation change if the new Uniform Transmission Rates are not implemented on January 1, 2011?
- 11. [Ref: Exh. 9/Tab 2/Sch. 1/Page 1] With respect to the Comstock claim:
 - a) Please provide the amount that has been spent on legal fees for this matter in total to date and per year.
 - b) How much is projected to be spent for 2011-12?

Respectfully submitted on behalf of the School Energy Coalition this 10th day of December, 2010

Mark Rubenstein