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BY EMAIL and RESS

April 15, 2011

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2010-0141 – St. Thomas Energy Inc. – Interrogatories

Please find attached the Interrogatories of the School Energy Coalition (SEC) with respect to EB-2010-0141 pursuant to Procedural Order #1 issued by the Board on the 1st of April.

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

Yours truly,

Originally Signed by

Mark Rubenstein

cc: Applicant and Intervenors

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

AND IN THE MATTER of an Application St. Thomas Energy 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 provide details about the number of 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. Please reconcile the statement that the Applicant distributes electricity to over 16,000 customers [Ex. 1/1/2/p.1] with the Customer Count in the OM&A per customer chart. [Ex. 1/1/4/p.6].
3. Please provide a list of all members Board of Directors and their brief biography for each of STEI, STESI, and STHI.
4. What % its services provided, does STESI provide to i) the City of St. Thomas ii) other municipalities ii) other electricity distributors and iii) other entities.
5. Please provide all presentations, reports and other materials provided to the Board of Directors with respect to approval of the 2011 budgets for OM&A and capital, including any supporting documents. Please provide any update materials where any budgets have been changed since their first approval.
6. [Ex. 1/2/3/p.1] Please provide detailed information on what each of the listed companies below did and the detailed purposes behind STHI's purchase of them.
 - a) Titran Services Inc.
 - b) Lizvo Sales Inc.
 - c) Tal Trees Inc.
 - d) ECM Controls Inc.
7. [Ex. 1/2/4/1] With respect to Master Services Agreement ("MSA"), please provide full details for each instance the provision listed below have been utilized by either SERVO or WIRESCO. Please provide all correspondence and documents that were exchanged between the two parties with respect to the utilization of each provision.
 - a) Section 5.03
 - b) Section 5.04
 - c) Section 5.06

8. [Ex. 1/2/4/ p.2] Please provide further details with respect to financial information for STEI with respect to “[p]ayments to STESI for capital expenditures...”
9. [Ex 1/2/4/p.2] Please provide full and complete financial statements and information for all affiliates of STESI.
10. [Ex. 1/2/4/2] Do the residents of the City of St. Thomas receive separate bills for water and hydro?
11. [Ex. 1/2/4/2/p.14] Please reconcile the following statement “any information related to the customer’s electrical system on the customer’s side of the interface is not accessible to Wiresco or Servo” with, “...confidential customer information is only used by employees of Servo to service the needs of Wiresco.
12. [Ex. 1/2/4/1] With respect to the MSA between STEI and STESI, please provide the names and positions of the signatories for each of the parties.
13. [Ex. 2/1] For each 2010 capital forecasted expenditures:
 - a) Please provide an update on the progress of construction
 - b) Please provide a table comparing actual amount spent to forecasted expenditures
 - c) For ‘New Service’ projects, please provide a table comparing actual new lots/homes serviced to the forecasted amount.
14. [2/1/1/p.32] With respect to the 2011 Voltage Conversation Program, please provide the business case and any supporting document.
15. [Ex.3/3/5/p.1]Please provide offset revenues information from 2006-2009 in the same format as has been provided for 2010.
16. [Ex. 4] Please provide detailed explanation for the variance in OM&A expenses for each year between 2006 till the test year.
17. [Ex. 4/2/1/p.2] Please provide 2010 actuals for OM&A expenses by account
18. [Ex. 4/2/1/p/3] Please detail which risks from “cost fluctuation driven from operation and manpower” the Applicant believes the MSA protects them from.
19. [Ex. 4/2/7/p.1] With respect to the addition of the position of Director, Regulatory Affairs:
 - a) Please detail why the Applicant believes that this position is necessary. Please provide any business case or any other document to support the decision.
 - b) Please detail how the Applicant decided upon the total compensation level of \$247,000. Please provide all documentation to support the decision.
20. [Ex. 5/1/2/p.3] Please update the evidence to account for the new weighted average cost of debt.

21. [Ex. 7/2/2/p.2] Please confirm that the Applicant in its application seeks to move the revenue-cost ratio of GS<50 from 99.92% to 110% and for GS>50 from 94.57% to 104%.
22. [Ex. 8/2/1/p.1] Please confirm that the fixed/variable split for GS>50 is above the maximum fixed rate. Please explain why the Applicant believes this is appropriate given Board policy.
23. [Ex. 8/4/3/p.1] Please provide the rationale behind the elimination of the Large User customer class. Has the Applicant consulted with the City of St. Thomas about this proposal?
24. [Supplemental Evidence] With respect to Employee Costs:
- a) Please confirm any outcome of the negotiations related to the Collective Agreement with Local Union 636 of The International Brotherhood of Electrical Workers, if any to date.
 - b) For each of the previous 4 years ending in the test year, please provide the number and % year over year increase in FTEs. Please disaggregate the increase in FTEs by:
 - i. additional persons hired solely to provide services to the Applicant
 - ii. additional persons hired to provide services to the Applicant as well as other activities of STESI or the City
 - iii. re-allocations of the time spent by existing persons working for the City or STESI.
 - c) Please confirm increase Total Compensation that the Applicant is proposing by percentage over the four year period ending in the Test Year.

Submitted by the School Energy Coalition on this 15th day of April, 2011.

Mark Rubenstein