

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 West Coast
Huron Energy Inc. for an order or orders approving just and
reasonable rates and other charges for the distribution of
electricity effective October 1, 2011.

INTERROGATORIES
FROM THE
SCHOOL ENERGY COALITION

1. [Ex. 1/1/2, p. 1] Please explain how the figure of \$2,400,000 was derived. Please explain why a 63 month rate adder based on an estimate is appropriate when, in 2012, the Applicant is filing for cost of service, so the cost will be known and a correct calculation can be used. Please explain why a temporary adder until next year, coupled with a deferral account, would not provide a better solution.
2. [Ex. 1/1/5, p. 1] Please confirm that the rate adder is expected to bring in approximately \$38,000 per month. Please advise how that provides immediate financial relief to the utility. Please provide any forward cash flows prepared by the Applicant showing how its cash position is affected by the proposed funding adder.
3. [Ex. 1/1/5, p. 1] Please provide a status report on any claims by the Applicant against the province's \$5 million Goderich tornado disaster relief fund.
4. [Ex. 1/1/5, p. 1] Please confirm that the Applicant had \$4,531,943 in shareholders' equity as of December 31, 2010. Please confirm that the Applicant's after-tax income in 2010 was \$542,043 on distribution revenue of \$2,260,799. Please provide the date and amount of each dividend paid in 2010 and 2011. Please reconcile these facts with the statement "the utilities financial position is in dire strait".
5. [Ex. 1/1/5, p. 2] Please advise why carrying costs should be included in the \$2.4 million, and provide the calculation of those carrying costs.
6. Please provide details on what contributions the shareholder is making to the costs being incurred by the Applicant relating to the tornado.

Submitted by the School Energy Coalition this 26th day of October, 2011.

Jay Shepherd