



## Jay Shepherd

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### **BY EMAIL and RESS**

October 26, 2011

Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> Floor  
Toronto, Ontario  
M4P 1E4

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2011-0271 – Halton Hills Hydro Inc. – Interrogatories**

Please find attached the Interrogatories of the School Energy Coalition (SEC) in the above-noted proceeding.

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

Yours truly,

*Originally signed by*

Mark Rubenstein

cc: J. Shepherd, SEC  
W. McNally, SEC  
A. Skidmore, HHHI  
D. Smelsky, HHHI  
R. King, Norton Rose OR  
Interested Parties

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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 by Halton Hills Hydro Inc. for an Order or Orders approving just and reasonable rates and other service charges for the distribution of electricity to be effective May 1, 2012.

**INTERROGATORIES**  
**FROM THE**  
**SCHOOL ENERGY COALITION**

1. Please provide the number of publically-funded schools in the Applicant's franchise area, by customer class.
2. [Ex. 2/1/2/p.5]  
Please explain in greater detail why the Applicant has decided to use 40 years instead of Kinectrics typical useful life of 50 years for switches, when it has stated that few switches over the past 35 years have needed to be replaced.
3. [Ex. 2/B/Poll Replacement -2011 (Estimate)]
  - a. How many polls where replaced by the Applicant in each of the past 3 years?
  - b. How many polls where planned to be replaced by the Applicant in each of the past three years?
  - c. How many polls year-to-date have been replaced?
4. [Ex. 2/B/Steeles Avenue – James Snow Parkway to 5<sup>th</sup> Line South]  
Please provide further details about this project. When is the road improvement planned to be undertaken by the Region of Halton? Please provide documentation to substantiate.
5. [Ex. 2/4/2/p.3]  
What would be the impact on the Cost of Power and resulting impact on Working Capital, if the Board approves the Hydro One Networks Inc. application to use USGAAP that is currently before the Board (EB-2011-0268)?
6. Please confirm that the table below correctly sets out the OM&A per customer relative to ten similar distributors (as set out in the 3<sup>rd</sup> Generation Incentive Regulation Stretch Factor Updates for 2011 Report in EB-2009-0392), based on the 2010 Electricity Distributors'

Yearbook. Please explain why the Applicant's OM&A per customer is much higher than the average of these peer utilities.

<b><u>OM&amp;A per Customer</u></b>		
<b><i>Utility</i></b>	<b><i>OM&amp;A/Customer</i></b>	<b><i>% of Average</i></b>
Brantford Power Inc.	\$202.57	103%
Burlington Hydro Inc.	\$225.95	115%
Cambridge and North Dumfries Hydro Inc.	\$188.39	96%
Guelph Hydro Electric Systems Inc.	\$200.18	102%
Halton Hills Hydro Inc.	\$217.25	110%
Kitchener-Wilmot Hydro Inc.	\$147.31	75%
Milton Hydro Distribution Inc.	\$192.72	98%
Newmarket - Tay Power Distribution Ltd.	\$221.53	112%
Oakville Hydro Electricity Distribution Inc.	\$179.51	91%
Oshawa PUC Networks Inc.	\$171.41	87%
Waterloo North Hydro Inc.	\$195.85	99%
Whitby Hydro Electric Corporation	\$223.49	113%
<b><i>AVERAGE</i></b>	<b><i>\$197</i></b>	

7. [Ex. 4/1/1/table 4-2]  
Please provide a table showing for each year between 2009 and 2011, a comparison of the budgeted and actual amounts spent, for each USoA as provided in table 4-2.
8. [Ex 4/1/1/table 4-6 ]  
Please provide a table showing for 2011 the planned bridge year spending and the year-to-date spending for each USoA as provided in table 4-6.
9. [Ex. 4/2/6]  
For each new FTE position created since 2008, please provide a detailed rationale to support the addition.
10. [Ex. 4/2/6/p.5]  
Please provide a copy of the current collective agreement between the Applicant and the union.
11. [Ex. 4./2/p.5]  
With respect to the new Apprentice Meter Technician, when specifically does the current meter technician plan to retire?
12. [Ex. 4/B]  
Please explain how the Applicant priced each of its services contained in the Appendixes of the Service Agreements between itself and its affiliates.
13. [Ex. 5/1/3/p/1]  
Please provide a copy of all outstanding debt instruments held by the Applicant.

14. [Ex. 5/1/3/p/1]  
Did the Applicant consider approaching Infrastructure Ontario as a way to finance its long-term capital spending? If not, please explain why.
15. [Ex. 6/1/2/p/1]  
Please provide a table detailing the revenue requirement impact of the switch from CGAAP to MIFRS.
16. [Ex. 7/1/2/p/3]  
Please explain why the Applicant is planning a significant shift in the revenue to cost ratio of the GS>50 shift from 86.9% to 95%.
17. [Ex. 9/2/4/p.2]  
Please explain in greater detail the purpose of the Applicant's request for Account 1595-Sub-account 2012?

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

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Mark Rubenstein