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November 7, 2011

BY EMAIL & COURIER

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge St, Suite 2701  
Toronto ON M4P 1E4

Dear Ms. Walli:

**Board File No. EB-2011-0207**  
**Woodstock Hydro Services Inc. – 2011 IRM Rates Application**  
**Energy Probe – Interrogatories**

Pursuant to the Notice of Application and Hearing issued by the Board on October 12, 2011, please find the Interrogatories of Energy Probe Research Foundation (Energy Probe) in the EB-2011-0207 proceeding.

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

Yours truly,

David S. MacIntosh  
Case Manager

cc: Ross McMillan, Woodstock Hydro (By email)  
Patricia Eitel, Woodstock Hydro (By email)  
Jay Shepherd, Counsel for the School Energy Coalition (By email)  
Randy Aiken, Aiken & Associates (By email)

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**Ontario Energy Board**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*,  
S.O. 1998, c. 15, Sched. B, as amended;

**AND IN THE MATTER OF** an application by Woodstock  
Hydro Services Inc. for an Order or Orders approving or fixing  
just and reasonable rates and other charges for the distribution  
of electricity as of May 1, 2012.

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**INTERROGATORIES OF  
ENERGY PROBE RESEARCH FOUNDATION  
("ENERGY PROBE")**

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**November 7, 2011**



**WOODSTOCK HYDRO SERVICES INC.  
2012 IRM CASE  
EB-2011-0207**

**ENERGY PROBE RESEARCH FOUNDATION  
INTERROGATORIES**

**Interrogatory #1**

**Ref: Application, Page 20 of 861, Threshold Test &  
EB-2010-0145 Decision and Order dated April 20, 2011**

**Please confirm that the figure shown for the depreciation expense on page 20 of \$2,060,280 and the figure of \$1,936,408 shown in the RRWF in the Settlement Agreement attached to the EB-2010-0145 Decision and Order differ by the amount of the depreciation expense allocated to transportation and stores.**

**Interrogatory #2**

**Ref: Appendix E-1**

- a) Please confirm that the \$7,498,083 in total revenue shown in the "Load Actual - Most Recent Year" sheet is based on current 2011 rates applied to actual 2010 kWh's and customer numbers.**
- b) Please explain and show the calculation of the tax rate of 23.2% shown at line X in the "Incremental Capital Adjustment" sheet.**

**Interrogatory #3**

**Ref: Appendix E-1, Threshold Parameters Sheet**

- a) Please confirm that the price cap index will need to be updated to reflect the price escalator and stretch factor when updated data becomes available.**
- b) Please explain how the growth factor calculation shown on this sheet is the % difference in distribution revenues between the most current complete year and the base year, as specified on page 10 of the June 22, 2011 Chapter 3 of the Filing Requirements for Transmission and Distribution Applications.**



- c) What is the impact on the value of the growth rate and the Threshold CAPEX if the growth rate is calculated as the Board approved 2011 distribution revenues (shown in the "Current Revenues from Rates" sheet) divided by the revenues calculated in the "Load Actual - Most Recent Year" sheet?

**Interrogatory #4**

**Ref: Application, Page 21 of 861, Eligible Incremental Capital Amount**

- a) Please confirm that, excluding the TS, the forecasted capital expenditures for 2012 are \$2,950,666.
- b) Are there any discretionary capital expenditures included in the amount noted in part (a) above? If yes, please identify and quantify these discretionary expenditures.