



Jay Shepherd

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BY EMAIL and RESS

November 28, 2011

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2011-0130 – Centre Wellington Hydro – 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
F. Theissen, CW

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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 Centre Wellington
Hydro Ltd. 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. [Tab 4, page 3-6]

With respect to the Fergus MS-2 Substation:

- a) What replacements and repairs have been undertaken with respect to the circuit switchgears and reclosers in the past 5 years?
- b) What is the estimated or actual probability of a ‘catastrophic transformer failure’?
- c) What is the estimated or actual probability that a ‘catastrophic transformer failure’ will cause oil to be released into the Grand River?
- d) What is the estimated or actual probability of a ‘major short circuit’ causing a transfer of high voltage from station to the ground failure into the office building via the secondary conductors?

2. [Tab 4, page 4]

Please explain why the SCADA project meets the requirements of the ICM. Please explain why the project cannot wait to be approved in the Applicant’s next cost of service application scheduled for next year.

3. [Tab 1, page 5]

Is the Applicant applying the half-year rule with regards to calculation of rate base and any associated depreciation expenses for the approved ICM expenditures?

Submitted by the School Energy Coalition on this 28th day of November, 2011

Mark Rubenstein