

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 Greater Sudbury
Hydro 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

Note: All of our interrogatories are restricted to the issue of the Community Energy Storage Smart Grid Fund – Demonstration Project (the “Project”)

1. Why does the Applicant believe it is appropriate for the Board to approve this Project during the IRM term?
2. If the Smart Grid Fund criteria excluded funding for LDCs, why does the Applicant believe it is appropriate for ratepayers to fund the Project?
3. [Ex. E/p.6-11]
The Applicant in discussing the benefits of the project, focus on the future benefits of the technology. What are the direct benefits to ratepayers of the Project?
4. [Ex. E/p.18]
Has the Project been vetted to date by the Ministry of Energy? If not, when does the Applicant believe it will occur?
5. Why has the Applicant proposed to collect the expenditures of this program through a rate rider instead of seeking approval for a deferral account?
6. Why does the Applicant believe it is appropriate for it to undertake the Project considering the Board is in the midst of a related consultation on *Developing Guidance for the Implementation of Smart Grid in Ontario* (EB-2011-0004)?

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

Mark Rubenstein