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 Norfolk Power Distribution Inc. for an order or orders approving just and reasonable rates and other charges for the distribution of electricity effective May 1, 2012.

INTERROGATORIES

FROM THE

SCHOOL ENERGY COALITION

- 1. [Staff #2, p. 2] Please provide a list of the "other charges/tariffs" referred to.
- 2. [Staff #3, p. 3] Please explain why the use of the "greater of" measurement is fair to the affected customers.
- 3. [Staff #11(c), p. 21] Please confirm that all dollar figures refer to 2012. If any do not, please provide the 2012 data.
- 4. [Staff #11(d)(ii), p. 23] Please explain how the fleet burden rates can remain the same when overhead amounts have been removed from the amount used to calculate the burden.
- 5. [Staff #17(b), p. 35] Please confirm that the impact of choosing 35 years as the useful life for pad-mounted transformers is to increase revenue requirement by about \$40,000. If this is not correct, please provide the correct number with the backup calculation.
- 6. [Staff #17(b) and (d), p. 35-6] Please show where in the table on page 35 is the breakdown of components of each item of PP&E. If they are not shown, please restate the table with the componentization shown.
- 7. [Staff #22, p. 42 and VECC #11, p. 12] Please explain how the reduced capital cost of new assets under IFRS (due to the change in capitalization rules) is adjusted in the method of calculating capital contributions.
- 8. [Staff #29(b), p. 52] Please provide the 2012 reliability targets.
- 9. [Staff #56, p. 88] Please provide details of the "change in allocation of expenses" referred to, and the impacts of that change.
- 10. [Staff #62, p. 95] Please provide a copy of the Dion-Durrell valuation report.

- 11. [SEC #2, p. 7] Please advise what comparative metrics, other than those proposed in interrogatories by SEC, the Applicant considers appropriate to benchmark or validate the performance or proposals of the Applicant. Please advise what benchmarking metrics are used by the Applicant in its management, or reporting to its Board of Directors.
- 12. [SEC #8, p. 21-3] Please provide a verbal explanation of this response at the Technical Conference.
- 13. [SEC #10, p. 26] Please provide a more detailed explanation of the transfer of the fibre project from the unregulated affiliate to the Applicant.
- 14. [SEC #17(b), p. 40] Please explain how the value of the land is factored into the cost calculation for the purposes of determining a fair rent.
- 15. [SEC #17(c), p. 41] Please provide a full list of the 2010 expenses of Norfolk Energy, together with an explanation in each case of who actually pays the expenses, the mechanism through which those expenses paid by the Applicant are allocated to the affiliate, and the place in the OM&A or other expenses of the Applicant where those expenses are included.
- 16. [EP #9, p. 16] Please confirm that the 2011 YTD is as of September 30th. Please provide year end figures if available. For each YTD figure that is less than a pro rata share of the new 2011 forecast, please explain why the remainder of the year will have such high spending relative to the YTD period.
- 17. [EP #11, p. 19] Please reconcile the term "tentatively scheduled" with EP #9, which shows all general plan as having already been spent.
- 18. [EP #13, p. 21] Please restate the table to show 2008 through 2010 including transformers, in a manner consistent with 2011 and 2012.
- 19. [EP #19(c), p. 36] Please provide details of all adjustments to #4390 or any other account required as a result of the higher miscellaneous non-operating income and/or the change in the accounting for billable work orders.
- 20. [EP #23(c), p. 42] Please provide a verbal explanation of these allocations at the Technical Conference.

Submitted by the School Energy (Coalition this 1 st da	y of January,	2012.
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Jay Shepherd	