



## Jay Shepherd

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### **BY EMAIL and RESS**

January 12, 2012

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-2011-0173 – Hydro Hawkesbury 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 very truly,

*Originally signed by*

Mark Rubenstein

cc: J. Shepherd, SEC  
W. McNally, SEC  
M. Poulin, HHI

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**IN THE MATTER** of the *Ontario Energy Board Act 1998*,  
Schedule B to the *Energy Competition Act*, 1998, S.O. 1998, c.15;

**AND IN THE MATTER OF** an Application by Hydro  
Hawkesbury 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**  
**OF THE**  
**SCHOOL ENERGY COALITION**

1. Please advise the actions the Applicant will take in the event that the Board does not approve the ICM and/or Z-Factor applied for.
2. [Ex 1/1/5/p.8]  
Please provide a reference in any Board decision, guideline or policy that allows a utility to be permitted to adjust its load forecast during the IRM term?
3. [Ex 1/1/5/p.9]  
In the format of the table on page 9, please provide 2011 actual data compared to the Board-Approved 2011 forecast.
4. [Ex. 1/1/5p.9]  
Why does the Applicant believe 2010 actual data is more reflective for 2012 than the 2010 Board-approved load forecast?
5. [Ex. 1/2/2/1, Ex. 1/2/2/2, Ex. 1/2/3/4]  
Please provide the instructions that were provided to GE Energy and BPR.
6. [Ex. 1/2/2/p.3] Please provide details on the reliability, maintenance and repair history of the transformer over the past 5 years.
7. [Ex. 1/2/3/p.3] Please explain why the Applicant is seeking recovery through a Z-Factor claim and not an ICM claim.
8. [Ex. 1/2/3/p.3] Please provide details on the reliability, maintenance and repair history of the transformer over the past 5 years.

9. [Ex. 1/2/3/p.9] Please provide a copy of all the information that was provided to the Board of Directors.

Respectfully submitted by the School Energy Coalition on this 12<sup>th</sup> day of January, 2012

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Mark Rubenstein  
Counsel to the School Energy Coalition