

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 Kingston Hydro
Corporation 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. [Ex. 5] Please confirm that all calculations and figures in this exhibit use CGAAP. Please provide the exhibit on a MIFRS basis if available. (If the exhibit is already in MIFRS, please provide in CGAAP.) Please confirm that all figures in the Application use CGAAP.
2. [General] Please provide a table showing the Board-approved capital budget for 2011, broken down by project, and also for each project the actual capital expenditures on that project in 2011. For each project that was not completed in 2011 as planned, please advise when the spending is expected to occur, the current amount expected to be spent, and the reasons for any change in scheduling or amounts.
3. [Ex. 6] For each of the four projects:
 - a. Please confirm that the driver “Asset Failure” does not mean that the particular asset has already failed, but rather that there is a concern that it will fail if it is not repaired or replaced.
 - b. Please provide the business case, if any, prepared internally to justify the project, and/or to justify any adjustments to the timing of the project.
 - c. Please provide the annual maintenance and other savings expected as a result of the project, and any calculations or documentation supporting those estimated savings.
 - d. Please provide details of all amounts to be paid to affiliates (including the City) as part of the budget for the project.
4. [Ex. 6] Please provide details of the timing and nature of any new hires planned to carry out the incremental projects, and reconcile the total labour costs in the incremental capital projects with the new hires planned.
5. [Ex. 6] With respect to the King St. 44kV Rebuild:

- a. P. 2. Please advise when the “unsafe working conditions for staff” were first reported, and what actions have been taken (and when) since that time to improve or mitigate these conditions.
 - b. P. 3. Please provide a comparison of reported oil leaks on M454 to reported oil leaks experienced in other circuits on the Applicant’s system.
 - c. P. 3. Please advise why this project has to be completed in 2012 to support the Substation 1 Rebuild if the engineering studies for the Substation 1 Rebuild have not yet been done.
 - d. P. 4. Please confirm that this is part of a multi-year plan to install concrete encased TR-XLPE. Please advise the spending in each year of the multi-year plan, both actual up to 2011, and planned from 2012 onward.
6. [Ex. 6] With respect to the TV6 Rebuild:
- a. P. 10. Please provide the original internal document that shows the comparison between options for this vault, and supports the statement that relocation and rebuild was “the more cost effective option”.
 - b. P. 10. Please advise when the problem of the oil switches being inoperable when live first arose, and what actions have been taken (and when) since that time to improve or mitigate this deficiency. Please provide the last three incident reports in which this arcing problem has been reported.
 - c. P. 11. Please provide details of the “extended outages” referred to.
7. [Ex. 6, p. 14] With respect to the MS#15 Circuit Breakers Retrofit, please confirm that this is part of a multi-year program of circuit breaker replacements. Please advise the spending in each year of the multi-year program, both actual up to 2011, and planned from 2012 onward.
8. [Ex. 6, p. 18] With respect to the TV11 Rebuild, please provide details of each of the “extended outages” referred to that have occurred in the last twelve months.
9. [Ex. 6, App. A] With respect to the Roney Report:
- a. P. 3 and 18. Please provide a copy of the Terms of Reference referred to. Please advise whether the term “cursory review” on page 18 is intended to reference the entire report.
 - b. P. 3. Please provide a copy of the “report that followed” the October/November 2008 review.
 - c. P. 4. Please provide detailed reasons why the CHBDC standard was stipulated, and the cost implications of that standard on the ICM projects.

- d. P. 5. Please confirm that this report does not propose immediate or urgent action with respect to TV6. Please explain the urgency of the proposed TV6 Rebuild in light of this report.
 - e. P. 7. Please explain why, despite a recommendation in 2009 to add shoring in TV11, it was not completed.
 - f. P. 8. When is the roof structure for TV18 scheduled to be replaced?
10. [Ex. 7] With respect to the 2012 Capital Expenditures Budget:
- a. P. 3. Please provide a table showing Labour and Vehicles, and Materials and Contracts, in this project category, for each of 2008 through 2011 actual, and 2012 through 2014 planned.
 - b. P.4. Please provide the multi-year plan for the SCADA replacement projects, including past and future spending, and revenue requirement impact (including tax implications) in each year.
 - c. P. 7. Please advise how the electric upgrades in TV41 and TV7 are different in type, cost, or otherwise, from the electric upgrades in TV6 and TV11, the two included as ICM projects.
 - d. P. 19. Please reconcile the 16 new interval metered customers with the figure of ten on the previous page.
 - e. P. 20. Please explain the relationship between the relay failure in 2009 and the relay replacement in 2012.
11. [Ex. 8] Please advise which projects in each of 2013 and 2014 are expected to be the subject of ICM applications.
12. [General] Please provide a table showing the labour component of all 2012 capital expenditures (including ICM projects) and comparing it to each of a) the total labour component actually incurred in 2011 for capital projects, and b) the total labour component included in the 2011 Board-approved capital expenditures. Please provide an explanation of any differences, if material.

Submitted by the School Energy Coalition this 17th day of January, 2012.

Jay Shepherd