



Jay Shepherd

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BY EMAIL and RESS

March 12, 2012

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2011-0250 – Lakefront Utilities Inc. – Further Interrogatories

Please find attached the Further 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: Applicant and Intervenors (by email)

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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 Lakefront Utilities
Inc. for an Order or Orders approving just and reasonable rates and
other service charges for the distribution of electricity.

FURTHER INTERROGATORIES

FROM THE

SCHOOL ENERGY COALITION

15. [SEC #2]
It appears the tables provided in response to the SEC interrogatory #2 are cut-off. Please provide the complete tables.
16. [SEC #3]
For each capital project above the materiality threshold in each table, please provide the projected in-service date.
17. [SEC #5]
Please provide in further detail the difference between 2011 budgeted and actual spending for account 5615.
18. [SEC #8]
Please explain why the Applicant believes that the retiring lineman is “expected” to retire on the date of his/her eligibility.
19. [SEC #13]
Please explain why the Applicant feels it is appropriate to have the MSC for the GS>50-2999 class significantly above the ceiling.
20. [VECC #16]
Please provide the Summary of OM&A Expenses for 2011 in MIFRS.
21. [VECC #17, Ex. 4 page 8]
Please explain why the Applicant has decided to use the comparable utilities listed in table 4.7 instead of the ‘Small Southern Low & Medium Underground’ Peer Group, set

out in the 2008 PEG Report and the *Report for the Ontario Energy Board on 3rd Generation Incentive Regulation Stretch Factor Updates for 2012* (EB-2011-0387)?

22. Please confirm the table below correctly sets out the Capital Additions per customer relative to seven similar distributors (as set out in the *Report for the Ontario Energy Board on 3rd Generation Incentive Regulation Stretch Factor Updates for 2012*), based on the 2010 Electricity Distributors' Yearbook. Please explain why the Applicant's Capital Additions per customer is much higher than the average of these peer utilities.

Capital Additions per Customer		
Utility	Capex/Customer	% of Average
Lakefront Utilities Inc.	213.95	172%
Hydro Hawkesbury Inc.	41.24	33%
Brant County Power Inc.	174.43	141%
Clinton Power Corporation	207.87	168%
Hydro 2000 Inc.	58.71	47%
Port Colborne Hydro Inc.	142.40	115%
Rideau St. Lawrence Distribution Inc.	46.24	37%
Wellington North Power Inc.	107.63	87%
AVERAGE	\$124.06	

23. [RRWF]

Please update the Revenue Requirement Work Form to account for any changes since the filing of the update application, including as a result of the interrogatory process. Please provide a corresponding list of changes and their individual revenue requirement impact.

All of which is respectfully submitted this 12th day of March, 2012.

Mark Rubenstein