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BY EMAIL and RESS

August 21, 2012

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2011-0121 – Erie Thames Powerlines – 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,

Original signed by

Mark Rubenstein

cc: Applicant and Intervenors (by email)

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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 Erie Thames
Powerlines Corporation for an Order or Orders approving just and
reasonable rates and other service charges for the distribution of
electricity, effective as of May 1, 2012 and to be implemented
September 1, 2012.

INTERROGATORIES
FROM THE
SCHOOL ENERGY COALITION

General

1. Please provide a copy of the audited financial statements for 2011.
2. Please explain the Applicant's delay in filings this application.

Rate Base

3. [Ex. 2]
Please provide a more detailed summary of the year over year variance of capital expenditures from 2008 to the Test Year as required by section 2.5.2.1 of the Board's Filing Guidelines.
4. [Ex.2/3/1/p.24]
Does the Applicant have a formal capitalization policy document? If so, please provide a copy.
5. [Ex.2/3/1/p.35]
Please provide any formal business cases for the new SCADA system. Please also provide a full cost breakdown for each phase.
6. [Ex.2/3/1p.27]
With respect to the Pole Replacement Project:
 - a) How many polls does the Applicant forecast to replace in the Test Year?

- b) How many polls have been replaced year-to-date?

Load Forecast

7. [Ex.3/2/1]

Please update the Load Forecast to include 2011 actual data.

OM&A

8. [Ex.4/1/2/p.1]

Please restate the 'Summary of Operating Costs' table without cost of power and depreciation.

9. [Ex.4/2/2/p.8]

Please provide a description of the year over year variance in OM&A costs from 2008 to the Test Year as required by Chapter 2, section 2.7.3 of the Board's Filing Guidelines.

10. [Ex.4/2/2/p.10]

Please expand Appendix 2-J to include:

- a) Years 2009, 2011 and 2012 year-to-date; and
- b) Please update the Test Year Versus Most Current Actuals calculation to include 2011 actuals.

11. [Ex.4/2/2/p.9]

Is the Applicant workforce unionized? If so, please provide a copy of the current collective agreement between itself and all bargaining units?

12. [Ex.4/2/3/p.1]

For each new position added since 2009, please provide a justification.

13. [Ex.4/2/4/p.2]

Please provide an updated Appendix 2-K chart that includes West Perth and Clinton employees for the years before amalgamation.

14. [Ex.4/2/4/p.2]

Please explain the increase in the percentage of compensation capitalized in 2012.

15. [Ex.4/2/5/p.1-2]

How does the Applicant determine the Allocated Costs for Executive Management and Human Resources services?

16. [Ex.4/2/5/p.1-2]

Please provide a copy of the Service Agreements.

Capital Structure and Cost of Capital

17. [Ex.5/1/1/p.4]

Please provide a copy of all outstanding debt instruments.

18. [Ex/5/1/p.5]

Please provide a copy of the capital lease obligations assumed from CRU solution.

Overview of Calculation of the Revenue Deficiency or Surplus

19. [Ex.61/2/p.1]

Please provide a table showing the drivers of the revenue deficiency.

Cost Allocation

20. Please confirm all classes besides Embedded and Unmetered are within the range of the Board's Cost Allocation Policy on revenue to cost ratios

All of which is respectfully submitted this 21st day of August, 2012

Mark Rubenstein
Counsel for the School Energy
Coalition