



## Jay Shepherd

Professional Corporation  
2300 Yonge Street  
Suite 806, Box 2305  
Toronto, ON M4P 1E4

### **BY EMAIL and RESS**

September 7th, 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-2012-0300 – Great Lakes Power Transmission – 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)

T. (416) 483-3300 F. (416) 483-3305

[mark.rubenstein@canadianenergylawyers.com](mailto:mark.rubenstein@canadianenergylawyers.com)

[www.canadianenergylawyers.com](http://www.canadianenergylawyers.com)

**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 Great Lakes  
Power Transmission Inc. on behalf of Great Lakes Power  
Transmission LP. for an Order or Orders approving just and  
reasonable rates and other service charges for the transmission of  
electricity, effective as of January 1, 2013 and January 1, 2014.

**INTERROGATORIES**  
**FROM THE**  
**SCHOOL ENERGY COALITION**

*[Note: All interrogatories have been assigned to issues. However, please provide answers that respond to each question in full, without being restricted by the issue or category. Many interrogatories have application to multiple issues, but all have been asked only once to avoid duplication.]*

**1. General**

*1.2 Is the overall increase in 2013 and 2014 revenue requirement reasonable?*

2. Please detail the GLPT budget approval process.
3. Please provide a copy of all presentations and other documents provided to the Board of Directors and GLPT's partners supporting approval of this application and the associated budgets.

**2. Rate Base**

*2.1 Is the proposed rate base for 2013 and 2014 appropriate?*

4. [Ex. 2-1-1/p.9]  
What is the projected in-service date of Phase 1 and 2 of the Master SCADA replacement project?
5. [Ex.2-1-1/p.11]  
Please explain the per structure cost increase for the Algoma Lines Wood structure replacements from 2013 to 2014.

6. [Ex.2-1-1/p.14]  
Please provide further details about the “conditions experienced when erecting new structures within Third Line TS for the Third Line Redevelopment project” that led to the acceleration of the Algoma Lines Wood Structure. Please provide any business cases or other documents regarding the acceleration of the project.
7. [Ex.2-1-1/p.15]  
Please provide the forecasted in-service date for the Third Line Redevelopment Project.

#### **4. Operations, Maintenance & Administration Costs**

*4.1 Are the overall OM&A forecast in 2013 and 2014 appropriate?*

8. [Ex.4-2-2/p.24]  
With respect to EWT LP costs:
  - a. How much of GLPT’s resources have in 2011 and 2012 have been allocated to EWT LP. Please provide a detailed breakdown of those costs.
  - b. Why does the GLPT believe that its senior executives will no longer be required for the EWT Line initiative in 2014?

*4.2 Are the proposed spending levels for Share Services and other costs in 2013 and 2014 appropriate?*

9. [Ex.4-2-4-B/p.23]  
Please update the ‘Benchmarking’ table to take into account Canadian Niagara Power Inc’s 2013 distribution cost-of-service application EB-2012-0112.

*4.4 Are the 2013 and 2014 compensation costs and employee levels appropriate?*

10. [Ex.4-2-3/p.2]  
Please provide a justification for each new position created since 2011.
11. [Ex.4-2-3/p.2]  
What type of assumptions is GLPT making in this Application regarding a future collective agreement with the Power Workers’ Union?

#### **5. Cost of Capital**

*5.2 Is the proposed long term debt rate appropriate?*

12. [Ex.5-1-1/p.2]  
Please provide a copy of all outstanding debt instruments.

#### **6. Deferral/Variance Accounts**

*6.1 Are the proposed amounts, disposition and continuances of GLPT’s existing Deferral and Variance Account appropriate?*

13. [Ex.9-1-3/p.6]

With respect to the Comstock deferral account:

- a. Please provide a detailed breakdown of all costs recorded in the Comstock deferral account.
- b. Please provide a copy of all pleadings and interlocutory decisions/orders in this matter.

14. [Ex.9-1-4/p.9]

Please explain what potential future costs could be recorded in IFRS Gains and Loses deferral account.

**Submitted by the School Energy Coalition on this 7<sup>th</sup> day of September, 2012.**

---

Mark Rubenstein