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BY EMAIL and RESS

December 17, 2012

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2012-0146 – Westario Power 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,

Signed in the original 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 Wasterio
Power Inc. for an Order or Orders approving just and
reasonable distribution rates and other service charges for the
distribution of electricity, effective May 1, 2013.

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

2-SEC-1

[Ex.2/3/3/Appendix 2-B] Please provide an updated 2012 forecast (or year-end actuals if available) for the Appendix 2B Fixed Asset Continuity tables.

2-SEC-2

[Ex.2/3/1/p.2] Please provide the number of polls replaced or forecasted to be replaced, from 2009-2013.

2-SEC-3

[Ex.2/3/1p.2] Please explain why the Applicant purchased a bucket truck each year from 2010-2012.

2-SEC-4

[Ex.2/4/3/Appendix 2-A]

Please provide a column comparing the 2012 Bridge Year forecast to 2012 actuals (year-to-date or year-end if available).

2-SEC-5

[Ex.2/4/4] Please provide an updated on the in-service status of all capital projects projected to go into-service in 2012.

4-SEC-6

[Ex.4/1/2/p.2] Please provide a similar table to Table 3 comparing the Applicant with all other utilities in the Mid-size Southern Medium-High Undergrounding Peer Group as determined in the *Report of the Board: Third Generation Incentive Regulation Stretch Factor Updates for 2013*.

4-SEC-7

[Ex.4/2/1/p.4] Please provide details about the costs associated with the “replacement of a Management employee.”

4-SEC-8

[Ex.4/2/1/p.6] Please provide details about the one-time cost for Health and Safety related consulting fees.

4-SEC-9

[Ex.4/3/1/p.8] Please explain why costs increased in Account 5120 in 2012 and 2013.

4-SEC-10

[Ex.4/3/1/p.11] Please explain the significant variance year over year in Tree Trimming and Line Clearing Operation costs.

4-SEC-11

[Ex.4/3/1/p.12] Please provide a copy of the vegetation study.

4-SEC-12

[Ex.4/3/1/Appendix 2-H] Please provide the 2012 forecasted amounts and 2012 actuals (year-to-date or year-end if available).

4-SEC-13

[Ex.4/4/1/p.5] Please explain the length periods of position vacancies between 2009 and 2011.

4-SEC-14

[Ex.4/4/1/p.6] With respect to the Short-Term Incentive (“STI”) compensation:

- a. Please explain the customer-focused metrics and targets used.
- b. Please provide the documents provided to employees that outline the STI compensation program.

4-SEC-15

[Ex.4/4/1/p.7] Please provide a copy of the Applicant’s current collective agreement with its union.

4-SEC-16

[Ex.4/4] For each new position since 2009, please provide a description and a justification for its creation.

4-SEC-17

[Ex.4/4/1/Appendix 2-K] Please provide a column for 2012 actuals.

4-SEC-18

[Ex.4/6/1/p.2] Please update the table to include 2012.

5-SEC-19

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

5-SEC-20

[Ex.5/1/1/p.2] Please provide details about alternatives the Applicant considered before agreeing to the loan with CIBC?

8-SEC-21

[Ex.8/4] Please provide the excel versions of the Bill Impact Models.

10-SEC-22

[Ex.10/1/1/p.9] Please provide a chart showing the useful lives adopted by the Applicant and the useful lives recommended by the Board's in its *Depreciation Study for Electricity Distributors* (EB-2010-0178) conducted by Kinetics. Please explain any derivations.

10-SEC-23

[Ex.10/1/1/p.9] Please provide a copy of the Applicant's capitalization policy.

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

Mark Rubenstein
Counsel for the School Energy Coalition