



## Jay Shepherd

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

### BY EMAIL and RESS

January 9, 2013

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-2012-0139– Innisfil Hydro Distribution Systems Limited – 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 Innisfil  
Hydro Distribution Systems Limited 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**

**1-SEC-1**

Please confirm that there are 14 schools in the Applicant's franchise area. Please advise the number of schools in each of the GS<50 and GS>50 classes.

**2-SEC-2**

[Ex.2/2/1/p.8-9] Please reconcile the 2011 closing balance amount of \$52,158,528 with the 2012 opening balance of \$54,353,342.

**2-SEC-3**

[Ex.2/2/1/p.9-10] Please provide updated 2012 Fixed Asset Continuity Schedules (CGAAP and MIFRS).

**2-SEC-4**

[Ex.2/2/2/1/Table 2.6] Please update Table 2.6 to include 2012 year-end actuals.

**2-SEC-5**

[Ex.2/3/1/p.18] Please provide an update on the status of all 2012 capital projects.

**2-SEC-6**

[Ex.2/3/1/p.18] With respect to the capital projects contained in this application:

- a) Are there any formal business cases or detailed analysis done to support the capital expenditures outlined in this application? If so, please provide.

- b) What was provided to the Board of Directors and Senior Management Team regarding all proposed or completed capital expenditures contained in this application? Please provide those documents.

**2-SEC-7**

[Ex.2/3/3/p.6] Please provide the most up-to-date IHDSL Scorecard available.

**2-SEC-8**

[Ex.2/5/4/p.1] Please explain why the Applicant is seeking a 4 year disposition period of the PP&E Deferral Account.

**2-SEC-9**

[Ex.4/1/1/p.2] Please explain the variance between the 2009 Board approved and 2009 actual OM&A expenses.

**4-SEC-10**

[Ex.4/1/1/p.6] Please substantiate the position that if a Customer Service Collection Specialist is not added the impact will be, “[c]ustomer dissatisfaction and risk of non-required collection notices of disconnection”.

**4-SEC-11**

[Ex.4/1/1/p.8] With respect to the proposed new IFRS/Financial Analyst position:

- a) Does the current Finance Department not have IFRS knowledge and necessary skills?
- b) How did the Applicant transition with CGAAP to IFRS without this new position?

**4-SEC-12**

[Ex.4/2/2/p.1] Please updated table 4.6-3.10 to include year-end 2012 actuals.

**4-SEC-13**

[Ex.4/2/3/p.3] With respect to the Applicant’s decision to internalize a group of lineman, please provide the cost-benefit analysis referred to.

**4-SEC-14**

[Ex.4/2/3/p.8] Please explain the Applicant’s decision to change the Bad Debt policy in 2010.

**4-SEC-15**

[Ex.4/2/4/p.4] Please explain the delay in hiring the Regulatory/CDM Manager?

**4-SEC-16**

[Ex.4/2/4/.3] Please update Table 4.16 to include 2012 year-end actuals.

**4-SEC-17**

[Ex.4/2/4/p.3-4] Please reconcile the change in FTEs from 2010 to 2011, contained in Table 4.16 (1.8) and the numbers contained on p.4 (0.7).

**4-SEC-18**

[Ex.4/2/4/p.3, Ex.1/H/p.10] With respect to the Collective Agreement between the Applicant and its Union:

- a) Please provide a copy of the current Collective Agreement.
- b) What assumptions is the Applicant making in this application regarding any potential wage increases to be included in 2013 after the expiry of the current Collective Agreement?

**4-SEC-19**

[Ex.4/2/5/p.3] Please provide a list of Non-Affiliate Suppliers for 2012.

**5-SEC-20**

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

**8-SEC-21**

[Ex.8/6/1/p.1. Ex.8/8/1/p.1] Please confirm that the labeling of the GS>50 and GS<50 rate classes are reversed.

**8-SEC-22**

[Ex.8/C] Please provide a copy of the Bill Impact Model in excel format.

Submitted by the School Energy Coalition on this 9th day of January, 2013.

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Mark Rubenstein  
Counsel for the School  
Energy Coalition