

**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 Horizon Utilities Corporation for an Order or Orders approving service area amendment.

**INTERROGATORIES TO HYDRO ONE**  
**FROM THE**  
**SCHOOL ENERGY COALITION**

SEC - 1 [Hydro One Evidence, p. 1] Please confirm that, in exercising the “right to connect” claimed by Hydro One, Hydro One agrees that its overriding obligation is to act in the best interest of its customers, including the potential customer that is the subject of the claimed right to connect.

SEC - 2 [H1E, p. 2] Please confirm that, if the fact that “the Application seeks to carve out, from the territory of HONI, the incumbent LDC, a new school being built”, is in the best interest of that school, Hydro One agrees that such a carve out will generally be appropriate.

SEC - 3 [H1E, p. 3] Please advise whether, prior to the delays referred to, the use of the M3 feeder to serve the customers in the subject area was the best option to serve those customers. Please advise what additional costs and other disadvantages will result by changing to a less optimal option, and how those additional costs could impact a) the customers to be connected, and b) the existing customers of Hydro One.

SEC - 4 [H1E, p. 7] Please provide (or reference the information already in the evidence) the final offer to connect from Hydro One to the School Board, and the full response from the School Board. Please advise the date of the School Board’s rejection of the Offer to Connect, and advise where Hydro One has disclosed that response in its evidence.

SEC - 5 [H1E, p. 7] Please advise whether the school would, subject to the applicability of the ST rate, be in the GS–Demand rate class or the UG-demand class. Please provide the annual monthly charges and volumetric charges that would currently be applicable to the school given the load estimates in the Offer to Connect, at:

- a. The proposed ST rates;
- b. The UG – Demand rates;
- c. The GS – Demand rates;
- d. The Horizon GS>50 rates.

SEC - 6 [H1E, p. 7] Please advise whether Hydro One agrees that inability of the School Board to open a needed school on time, as a result of Hydro One’s opposition to this Application, is a factor to be considered in determining “the public interest”.

SEC - 7 [H1E, p. 8] Please respond to the allegations in the Observer Request from the School Board to the Board relating to power quality issues at one Hydro One supplied school.

SEC - 8 [H1E, p. 9] Please identify the “upstream customers [who] have made significant contributions in aid of construction with a reasonable expectation that future connections will provide contributions in turn as they become connected” related to the feeders to be used to serve a) the school, b) Phase 7 of the development, and c) the other customers in the subject area, and in each case the total amount of all such contributions.

SEC - 9 [H1E, p. 10] Please explain why it is in the public interest for the school and the other new customers in the subject area to subsidize Hydro One’s existing customers.

SEC - 10 [H1E, p. 11] Please provide the correct rate comparison, rate class and load forecast as referred to in (c).

SEC - 11 [H1E, p. 15] Please provide a map showing the Urban and Non-urban areas “south of HUC’s service territory”.

SEC - 12 [H1E, p. 14] Please confirm that the School Board is “a new customer [who] has compared two Offers to Connect and wishes to connect to a non-incumbent LDC”.

SEC - 13 [H1E, App. A, p. 1] Please provide the date of this study. If this is not the original first page of the study, please provide the original first page.

SEC - 14 [H1E, App. B, p. 1] Please provide the date of this document. If the original document included the date, please provide the full original document.

SEC - 15 [H1E, App. D, Schedule F] Please recalculate this schedule with the sole change being to use Horizon’s current Board-approved distribution rates rather than Hydro One’s rates.

SEC - 16 [H1E, App. E, p. 2] Please explain why the work referred to in #8 was being done “on an accelerated schedule”.

SEC - 17 [Horizon IR response to Hydro One #8] Please show side by side calculations of Hydro One's Offer to Connect based on the demand figures 458.3 and 1,108.3, and based on 1,100 and 1,300.

SEC - 18 [Horizon IR response to Hydro One #14] Please provide the map Hydro One requested from HUC, and HUC is unable to provide.

SEC - 19 [Horizon IR response to Hydro One #17] Please confirm that Hydro One proposes to connect the school on a radial fed feeder, as stated by Horizon.

Respectfully submitted on behalf of the School Energy Coalition this 23<sup>rd</sup> day of January, 2013

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Jay Shepherd