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BY EMAIL and RESS

January 23, 2012

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2012-0126 – Greater Sudbury Hydro 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,

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 Greater
Sudbury Hydro 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

1-SEC-1

Please confirm that there are 58 schools in the Applicant's franchise area. Please advise the number of schools in each of the GS<50 and GS>50 classes.

1-SEC-2

[Ex.1/2/1/1] Please explain what the Applicant intends to do with the results of the Customer Survey Report? Is the Applicant seeking to rely on the results of this survey to justify any expenses or capital expenditures in this application?

2-SEC-3

[Ex/2/4/2] Please provide an update on the status of all projects with an in-service date of 2012.

2-SEC-4

[Ex.2/4/2/p.2] Please explain the significant year-over-year variances in the 'Failed Transformers' project category.

2-SEC-5

[Ex.2/4/2/p.6] Please explain the significant variance and provide greater details about the 'Building' project category.

2-SEC-6

[Ex.2/4/2/p.7] Please explain the significant variance and provide greater details about the 'Vehicles' project category.

2-SEC-7

[Ex.2/3/2/p.12] With respect to the SCADA project

- a. Please provide the amount and what was specifically sought and received for the SCADA project in the Applicant's last cost of service application?
- b. Please explain the significant year-over-year variance?
- c. Please provide greater detail about the proposed 2013 budgeted amount?
- d. Please provide any business case or cost/benefit analysis undertaken regarding the proposed SCADA expense.

2-SEC-8

[Ex.2/4/2/p.25] Please provide greater details about the 'Copper Cliff Rebuild' project.

2-SEC-9

[Ex.2/4/2/p.25] Please provide any business case or cost-benefit analysis undertaken regarding the Outage Management System project.

2-SEC-10

[Ex.2/4/2/p.26] With respect to the 'Arthur Substation' project:

- a) Please provide any business case or cost-benefit analysis undertaken.
- b) Please provide details about the current condition of the asset.
- c) Please provide details about the noise complaints the Applicant has received.

4-SEC-11

[Ex.4/1/1/p.3] Has the City of Greater Sudbury given any required legal notice of its termination of the current water billing arrangement with Greater Sudbury? If so, when is the date in which current arrangement ends?

4-SEC-12

[Ex.4/1/1/p.3] Why is the Applicant moving to monthly billing?

4-SEC-13

[Ex.4/2/1/2] Please update Appendix 2-I and 2-G to include 2012 year end actuals.

4-SEC-14

[<https://lobbyist.oico.on.ca/LRO/RegistrationPublic.nsf/b13320178443e46e8525682a0073cea9/f4d9aab35694aeb8852579e600501063>] With respect to the Applicant retaining Hill+Knowlton Strategies:

- a) Please explain the purpose of the Applicant retaining Hill+Knowlton Strategies to lobby the Government of Ontario.
- b) Please explain why the Applicant believes this is a prudent expense.

- c) Which USoA account is used to record these expenditures?
- d) Please provide the amount spent in 2012.
- e) Please provide the budgeted amount for 2013.

4-SEC-15

[Ex.4/4/1/p.2] Please provide a copy of the collective agreement between the Applicant and the Union.

4-SEC-16

[Ex.4/4/1/p.2] Please detail and provide a justification for each new positions added (or proposed to be added) since 2009.

4-SEC-17

[Ex.4/4/1/p.2-3] Please provide a breakdown of the overtime hours by category of work.

4-SEC-18

[Ex.4/4/1/p.2K] With respect to Employee costs (Appendix 2-K):

- a) Please explain why the Applicant does not have an 'Executive' category.
- b) Please split the 'Management' category into two groups. Group 1 to include the following positions: CEO, VP Corporate Services, VP Electrical Distribution, Risk Management Officer, Human Resources Manager and IT Supervisor (based on Ex.1/1/10/2/p.1]. Group 2 to include the remaining 'Management' employees.

4-SEC-19

[Ex.4/5/1/p.4] Please provide a breakdown of all cost changes as a result of the removal of water billing.

5-SEC-20

[Ex.5/1/1/p.3] Please provide a copy of the TD rate swap agreement.

5-SEC-21

[Ex.5/1/1/p.3] With respect to the proposed 2013 debt issuance:

- a) Has the proposed 2013 TD loan been issued? If so please provide a copy. If not, please provide the proposed revised issuance date.
- b) What options did the Applicant consider in finance its upcoming capital expenditures?

c) How did the Applicant forecast the rate of the proposed TD loan?

8-SEC-22

[Ex.8/2/1/p.6] Please explain the increase in the proposed Fixed Rate for GS>50 customers.

8-SEC-23

[Ex.8/4/4/2] Please provide the excel version of the Bill Impacts Model

Submitted by the School Energy Coalition on this 23rd of January, 2013.

Mark Rubenstein
Counsel for the School
Energy Coalition