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BY EMAIL and RESS

January 28, 2013

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2012-0167 – Thunder Bay Hydro Electricity Distribution – 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 Thunder Bay
Electricity Distribution 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 51 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/p.6]

If the City of Thunder Bay does not seek a dividend from the Applicant, what does the Applicant intend to do with the revenue received from its return on equity?

2-SEC-3

[Ex.2/1/1/p.1]

Please update Table 2.1.1 to include 2012 actuals.

2-SEC-4

[Ex.2/3/2/p.5]

Please provide a description and justification for each capital project above the materiality threshold undertaken since the last rebasing application.

2-SEC-5

[Ex.2/3/2/p.15]

Please update the in-service date for all 2012 Distribution Capital Projects.

2-SEC-6

[Ex.2/3/2/p.16]

Please update the start dates for all 2013 Distribution Capital Projects.

4-SEC-7

[Ex.4/1/1/p.4]

Please update Tables 4.12 and 4.1.3 to include 2012 year end actuals.

4-SEC-8

[Ex.4/2/3/p.4]

Please provide details about the pending lawsuit.

4-SEC-9

[Ex.4/2/3/p.4] With respect to the Applicant utilizing legal counsel to “assist with procurement issues”:

- a) Please detail each procurement process in which the Applicant utilized legal counsel since 2009.
- b) Please provide the value of the asset or service procured and the cost of legal counsel for that specific process.

4-SEC-10

[Ex.4/2/3/p.10]

Please provide a similar variance analysis for 2012 actual versus 2013 Test Year.

4-SEC-11

[Ex.4/2/4/p.3]

Please provide the most recent Balanced Scorecard.

4-SEC-12

[Ex.4/2/4/p.3]

Please reconcile the numbers in chart 4.2.9 with chart 4.2.11.

4-SEC-13

[Ex. 4/2/4/p.4]

Please provide a copy of the Applicant’s collective agreement with its union.

4-SEC-14

[Ex.4/2/4/p.17]

In the past ten years, how long after a skilled tradesperson is eligible for retirement do they retire? Please provide a breakdown by Classification (per Table 4-2.12).

4-SEC-15

[Ex.4/2/6/p.4]

Please provide a list of Non-Affiliate Suppliers for 2012.

5-SEC-16

[Ex.5/1/1/p.2]

Please provide a copy of the TD Bank Loan.

5-SEC-17

[Ex.5/1/1/p.5] Please explain why the debt holders for the 2012 and 2013 Infrastructure Financing are listed as unknown.

Submitted by the School Energy Coalition on this 28rd of January, 2013.

Mark Rubenstein
Counsel for the School
Energy Coalition