



Jay Shepherd

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

BY EMAIL and RESS

February 22, 2013
Our File No. 20130029

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2013-0029 – RESG Market Rules Review – Interrogatories

Please find attached the interrogatories to the Applicant of the School Energy Coalition (SEC) in the above-noted proceeding.

Yours very truly,
Jay Shepherd P.C.

Original signed by

Mark Rubenstein

cc: Applicant and Intervenors (by email)

T. (416) 483-3300 F. (416) 483-3305

mark.rubenstein@canadianenergylawyers.com
www.canadianenergylawyers.com

IN THE MATTER OF the *Electricity Act*, 1998, s.33;

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 made collectively by
entities that have renewable energy supply procurement contracts
with the Ontario Power Authority in respect of wind generation
facilities for an Order revoking certain amendments to the market
rules and referring the amendments back to the Independent
Electricity System Operator for further consideration.

INTERROGATORIES

FROM THE

SCHOOL ENERGY COALITION

1. For each RES I and RES II contract entered into by an Applicant, please provide:
 - a. A copy of the contract and any subsequent amendments and/or other changes.
 - b. The contract price of each MWh delivered.
 - c. The total contracted capacity.
 - d. The actual MWh of electricity delivered by year.
 - e. The actual gross revenue received by year.
 - f. The actual net revenue received by year.
2. Please provide any forecasts (and the supporting documents) made by the Applicants, and/or an individual Applicant, of:
 - a. Hours of curtailment projected.
 - b. Loss revenue as a result of the Renewable Integration Amendments.
3. [Application para. 54] Please provide the basis for the Applicants' estimate that in absence of compensation the impact of the Renewable Integration Amendments will be \$100m over five years.
4. Please provide full versions of documents contained in Schedules I and L of the Application.
5. What is the nature and scope of the negotiations between the Applicant and the OPA?

Submitted by the School Energy Coalition on this 22nd day of February, 2013.

Original signed by

Mark Rubenstein
Counsel for the School
Energy Coalition