



Jay Shepherd

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

BY EMAIL and RESS

April 18, 2013

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2012-0175 – West Coast Huron Energy – Interrogatories

We are counsel to the School Energy Coalition (“SEC”). Enclosed please find enclosed the interrogatories on behalf 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 *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 West Coast
Huron Energy 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 provide a table showing any adjustment arising from the interrogatory process. This table should include the IR number, application area, description of the change and the impact on the revenue requirement,).

2-SEC-2

[Ex. 2/3/1] For each customer class, please identify if the Applicant bills monthly, bi-monthly, or some combination.

2-SEC-3

[Ex. 2/2/1] Please update the 2012 and 2013 Fixed Asset Continuity Schedule to include the impact of 2012 year-end actuals.

2-SEC-4

[Ex. 2/2/1] Please provide a detailed table setting out all the rate base impacts related to the F3 Tornado for 2011-2013.

2-SEC-5

[Ex. 2/2/1] Please provide the projected in-service date for all Test Year capital projects.

3-SEC-6

[Ex. 3/1/3] Please provide an updated the 'Summary of Operation Revenue Table' to include 2012 year-end actuals.

3-SEC-7

[Ex. 3/2/3] Please provide an updated to the 'Customer Court Forecast Table' to include any changes based on the 2012 actual customer count. .

4-SEC-8

[Ex. 4/1/2] Please revise the table to exclude amortization and cost of power expenses.

4-SEC-9

[Ex. 4/2/3] Please explain the increase in meter reading costs.

4-SEC-10

[Ex. 4/2/3, Appendix 2-H] Please update the table to include 2012 year-end actuals.

4-SEC-11

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

4-SEC-12

[Ex. 4/2/4] Please provide descriptive year-over-year variance analysis for the OM&A cost drivers.

4-SEC-13

[Ex. 4/2/5] Please provide a copy of the current collective agreement between the Applicant and its union.

4-SEC-14

[Ex. 4/2/5, Appendix 2-K] Please explain the capitalization policy change for 2011 that resulted in some labour costs for the first time being capitalized.

4-SEC-15

[Ex. 4/2/6] For all purchases from non-affiliate service, please provide a table setting out the name of the supplier, type of expenses, procurement method and amount of the expenses for each year from 2009 to 2012.

5-SEC-16

[Ex. 5/1/3] Please provide a copy of all outstanding debt instruments.

5-SEC-17

[Ex. 5/1/3] Please provide a table setting out for each outstanding debt instrument in the Test Year, its description, the holder of the debt, the date of issuance, the principal amount, the term, the interest rate and the Test Year interest cost.

5-SEC-18

[Ex. 5/1/1] Please provide the Applicant's actual ROE for each year between 2009 and 2012.

7-SEC-19

[Ex. 7/1/1] Please provide the Applicant's proposed revenue to cost ratios for each customer class. If any vary from the Board's approved ranges, please provide an explanation on why the Applicant believes that is appropriate.

8-SEC-20

[Ex. 8/1/7] Please provide an excel version of the Bill Impact Model.

9-SEC-21

[Ex. 9/1/5] Please provide a detailed breakdown of all outside services, materials, and net book value of the distribution assets destroyed.

9-SEC-22

Please explain why the Applicant is not recording or seeking disposition of Account 1575-IFRS Transition PP&E. Please provide a completed Appendix 2-EA/B.

Submitted by the School Energy Coalition on this 18th day of April, 2013

Mark Rubenstein
Counsel for the School
Energy Coalition