



Jay Shepherd

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

BY EMAIL and RESS

August 6, 2013

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2012- 0116 – COLLUS PowerStream – Interrogatories

We are counsel to the School Energy Coalition (“SEC”). Enclosed please find interrogatories on behalf of 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 Collus
PowerStream Corporation 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,).

1-SEC-2

[Ex.1/1/13, Ex.2/3/1/p.2]

Please provide all documents and information that was provided to the Board of Directors, in approving this application and the Test Year budget.

2-SEC-3

[Ex.2/3/1]

Please provide details of the planned capital expenditures for 2014-2017.

2-SEC-4

[Ex.2/3/1/p.1]

Please provide the expected in-service dates for each Tear Year major capital project

2-SEC-5

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

With respect to poll replacement:

- a) Please provide the numbers of polls replaced in each year between 2009-2012.
- b) Please provide the numbers of polls budgeted to be replaced in the Test Year.
- c) Please provide the numbers of polls replaced in the Test Year year-to-date.

2-SEC-6

[Ex.2/3/4/1-24]

For each major capital project listed, please provide a table comparing budgeted cost with the actual amount spent.

2-SEC-7

[Ex.2/3/4/p.21]

Please provide a list of the Applicant's current vehicle fleet, with the original in-service date.

3-SEC-8

[Ex/3/3/1/p.2]

Please expand Table 2 to include 2013 year-to-date actuals.

3-SEC-9

[Ex/3/3/1/p.2]

Please explain why there is no Gains on Disposition of Utility and Other Property for the Test Year, considering the Applicant is seeking to purchase a number of new vehicles.

4-SEC-10

[Ex.4/1/1/p.2]

Please provide a copy of the Applicant's collective agreement with the IBEW.

4-SEC-11

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

Please explain how 28.5 % increase in the Community Relations budget can be "primarily due to inflationary based salary increases".

4-SEC-12

[Ex.4/1/2/p/2]

Please quantify and detail the anticipated savings in the Test Year as a result of the 50% acquisition by PowerStream Inc.

4-SEC-13

[Ex.4/2/1/p.1-2]

Please provide a copy of the results of the 12th Annual Electricity Utility Customer Survey and the 2013 UtilityPulse survey.

4-SEC-14

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

Please update Tables 1-5 to include 2013 year-to-date actuals.

4-SEC-15

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

Please provide a year-over-year OM&A Cost Driver Table for 2009-2013.

4-SEC-16

[Ex.4/4/3/p.1]

Please explain the changes in the allocated rent for Storages and Vehicles.

4-SEC-17

[Ex.4/4/5/Appendix B]

Please detail the Incentive/Bonus Payment system.

4-SEC-18

[Ex.4/4/7/p.2]

Where applicable, please explain the Applicant's variance from the Asset Depreciation Study conducted by Kinectrics.

5-SEC-19

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

Please provide the Applicant's actual ROE for each year between 2009-2012.

5-SEC-20

[Ex.5/1/1/p.2] Please provide a copy of all outstanding debt instruments not already included in the evidence.

Submitted by the School Energy Coalition on this 6th day of August, 2013

Original signed by

Mark Rubenstein
Counsel for the School
Energy Coalition