

IN THE MATTER OF the Ontario Energy Board Act, 1998,
S.O. 1998, c.15, Schedule B;

AND IN THE MATTER OF applications by Canadian Niagara Power Inc.-Fort Erie, for
approval of electricity distribution rates to be implemented on May 1, 2007

**INTERROGATORIES OF THE
SCHOOL ENERGY COALITION**

1. Please provide the number of publicly-funded (i.e. public board and Catholic Board, French and English) elementary and secondary schools in each rate class in your service territory.
2. Please confirm:
 - a) that a school with monthly consumption of 8000 KWh in the General Service < 50 KW would pay approximately \$206.27 per month for electricity distribution under the current proposed 2007 rates (including the proposed Z-factor adder), an increase of 6.2% over 2006;
 - b) that a school with monthly demand of 200KW in the General Service > 50 KW would pay approximately \$1559.67 per month for electricity distribution under the current proposed 2007 rates (including the proposed Z-factor adder), an increase of 0.5% over 2006;
3. Please advise:
 - a) whether the company owns or operates electricity transmission facilities within its service territory;
 - b) whether there was any damage to the transmission system as a result of the October 12, 2006 snow storm;
 - c) Please describe and justify the methodology used to allocate storm damage cost to the company's transmission division;
4. Ref: Appendix C/Exhibit C/Schedule A/Tab 5/Pg 1
 - a) Please provide, for overtime charges, the number of staff (both management and non-management internal labor) directly engaged in the power restoration efforts and the number of overtime hours they worked each day;

- b) Please confirm, that the overtime labor rate is \$79.66 for non-management staff.
- c) Please provide base salary and other components included in the regular labor rate and their respective amount;

5. Ref: Appendix C/Exhibit C/Schedule A/Tab 5/Pg 4

Please advise:

- a) why interest cost is added to the cost of damage for recovery;
- b) if cost of storm damage is to be recovered over a two-year period, why should interest cost in the amount of \$30,810 (\$6162 per month) covering the period of Dec 2006 to April 2007 be included;

6. Ref: Appendix C/Exhibit C/Schedule A/Tab 5/Pg 2

- a) Please provide, by each LDC and outside contractors, a breakdown of the cost claimed into the following components: labor, material, equipment and other costs;
- b) Please provide copy of invoices issued to the company by the following LDCs engaged in the restoration efforts: Hydro One, Horizon Utilities, Niagara Falls Hydro, Enersource Hydro Mississauga, Cornwall Electric, Burlington Hydro-K Line Contractors and Westario Power;
- c) Please provide copy of invoices issued to the company by the following outside contractors engaged in the restoration efforts: Ground Aerial Maintenance, Pineridge Tree & Lawn, Lucas Tree Experts, Emburgh's Heavy Equipment Service, Davey Tree Experts.

7. Ref: Appendix C/Exhibit C/Schedule A/Tab 5/Pg 3

- a) Please provide a copy of the company's property insurance policy on its transmission and distribution systems;
- b) Please provide updates on the process of the company's insurance claim in connection with the October Disaster;

8. Ref: Appendix C/Exhibit C/Schedule D/Tab 8/Pg 1

- a) Please provide reference of "Volumetric Billing Determinant" provided in the "Derivation of Z-factor Rate Riders" table.

9. Please provide a copy of the property damage report.