**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 Brantford Power Inc. for an Order or Orders approving just and reasonable rates and other service charges for the distribution of electricity, effective on May 1, 2013.

## **INTEROGATORIES**

## OF THE

## **HVAC COALITION**

- 1. [Ex1/1/13] Please confirm that "Brantford Hydro" was formerly the name of the regulated utility, and is now the name of a retail affiliate.
- 2. [1/1/14] Please advise whether any additional unregulated affiliates are currently planned or expected. Please confirm that the corporate group has reserved the name "EnerSure" for unregulated businesses. Please advise which existing or expected members of the corporate group will be rebranded with this name, or any other new name, when, and for what business activities.
- 3. [1/1/14] Please confirm that the corporate group plans to expand its unregulated activities.
- 4. [1/1/14] Please file any business plans, strategic plans, or similar documents of the parent company, the utility, or any affiliate, that include any unregulated activities that will rely in whole or in part on assets, personnel, or shared services (including shared services shared via the City) from the regulated utility. In each case please provide details of the nature, quantity and value of assets, personnel and shared services that will be used, and how the Applicant is ensuring that there is no ratepayer subsidy of unregulated activities.
- 5. Please file the Applicant's most recent ARC Compliance Report from the Board.

Respectfully submitted on behalf of the HVAC Coalition this 30<sup>th</sup> day of September, 2013.

Jay Shepherd
Counsel for the HVAC Coalition