



## **Jay Shepherd**

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### **BY EMAIL and RESS**

September 30, 2013

Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> Floor  
Toronto, Ontario  
M4P 1E4

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2012-0109 – Brantford Power Inc. – 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)

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**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 or fixing just and reasonable  
rates and other services charges for the distribution of electricity as  
of November 1, 2013.

**INTERROGATORIES**  
**ON BEHALF OF THE**  
**SCHOOL ENERGY COALITION**

**1-SEC-1**

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

**1-SEC-2**

[Ex.1/3/1]

Please provide the following documents:

- a) The Applicant's Audited 2012 Financial Statements
- b) Brantford Energy Corporations 2012 Non-Consolidated Financial Statements
- c) Brantford Energy Corporations 2012 Consolidated Financial Statements

**2-SEC-2**

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

Please update Appendix 2-A to include a column for Test Year year-to-date actuals.

**2-SEC-4**

[Ex.2/3/2.p.57-73]

Please provide the specific actual (or expected) in-service date for all Test Year capital projects.

**2-SEC-5**

[Ex.2/3/2.p.57-73]

For each Test Year capital project, please provide the amount of capital contribution (if any).

**2-SEC-6**

[Ex.2/3/2/p.65]

Is the Applicant eligible to receive any capital contributions from the IESO or Hydro One to offset the cost of the Study Report on BPI Powerline Municipal Transformation Station 27.6kV Capacitor & Reactive Support & Capacity Banks Installation- 27.6 kV Distribution System project.

**2-SEC-7**

[Ex.2/3/2/p.71]

How much has the Applicant spent in each year from 2009-2012 for vehicle replacements.

**2-SEC-8**

[Ex.2/3/2]

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

**2-SEC-9**

[Ex.2/3/5/Appendix B-5/p. 4]

Please confirm that an asset that has a useful life of less than 30 percent does not necessarily mean that it has 'extensive serious deterioration'.

**3-SEC-10**

[Ex.3/3/3/Appendix 2-F]

Please update Appendix 2-F to include Test Year year-to-date actuals.

**4-SEC-11**

[Ex.4/2/3]

Please provide any formal documents such as legal agreements between the Applicant and the City of Branford detailing the re-organization and the transfer of employees to the Applicant.

**4-SEC-12**

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

Please update Appendix 2-F to include a column for Test Year year-to-date actuals.

**4-SEC-13**

[Ex.4/2/3]

What date was the Test Year OM&A budget included in this application finalized.

**4-SEC-14**

[Ex.4/2/5/p.4]

How did the Applicant determine the reasonableness of the cost of services it purchased from the City prior to the implementation of the renegotiated SSA?

**4-SEC-15**

[Ex.4/2/5/p.1]

Please provide a copy of the current collective agreement with CUPE and the last collective agreement with the IBEW.

**4-SEC-16**

[Ex.4/2/5/p.1]

Please provide an update on negotiations on a new collective agreement with the IBEW.

**4-SEC-17**

[Ex.4/2/6/p.8-9]

With regards to Forestry (Tree Trimming):

- a) What was the cost of Tree Trimming in 2012?
- b) Has the scope of Tree Trimming services changed since 2012? If so, please detail.

**5-SEC-18**

[Ex.5/1/1/p.2]

Please provide a copy of all outstanding debt instruments not already provided in evidence.

Submitted by the School Energy Coalition on this 30<sup>th</sup> day of September, 2013

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy Coalition