

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 Kitchener-Wilmot
Hydro Inc. 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. Administration

1-SEC-1

Please confirm that there are 86 schools in the Applicant's franchise area from three school boards. Please advise the number of schools in each of the GS<50 and GS>50 classes.

1-SEC-2

[1/1/12]

Please advise whether a merger of the contiguous utilities is possible or contemplated within the time frame of the IRM term.

1-SEC-3

[1/2/1, p. 5]

Please provide the annual revenue requirement impact of the capital component of owning the eight transformer stations, plus any impact on annual charges from Hydro One, to go along with the \$17.01 per customer operating costs.

1-SEC-4

[1/2/9, p. 2]

Please advise why KPC is not being charged for Accounting Services on a fully allocated basis, i.e. a proportionate share of all costs associated with the function, not just incremental costs.

4. Operating Costs

4-SEC-5

[Ex. 4/3/1 p.14]

Please provide any cost-benefit analysis or other documentation showing the operating cost impacts of the Service Centre renovation.

4-SEC-6

[Ex. 4/4/1 p.8]

Please provide whatever documents are relied on for the statement “KWHI’s pay rates are competitive with other LDCs in the Waterloo Region”.

4-SEC-7

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

Please advise what components of the work being done for the City and the Township will continue to be actually performed by the Applicant’s employees. Please advise the basis on which the Applicant will bill KESI for this work, and explain any differences between the current charges to the City and the Township, and the expected charges to KESI.

4-SEC-8

[Ex. 4/7/1 p.3]

Please explain why there is such a substantial drop in Contributions and Grants upon conversion to IFRS.

Submitted by the School Energy Coalition on this 1st of October, 2013.

Jay Shepherd