

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 Powerstream Inc.
for an Order or Orders approving just and reasonable distribution
rates and other service charges for the distribution of electricity,
effective January 1, 2014.

INTERROGATORIES
OF THE
SCHOOL ENERGY COALITION

1. [Application, p. 8] Please advise the number of years the incremental capital rate riders are expected to be in effect, i.e. the number of years until “the next cost of service rates”.
2. [Application, p. 10] Please file the most recent internal update of the Kinectrics Asset Condition Assessment.
3. [Application, p. 10] Please advise which of the ICM projects are multi-year projects that are expected to continue beyond 2014. Please advise whether ICM applications are expected to be filed for any of 2015, 2016, or 2017, and if so for which years. Please provide any memoranda, plans, or other documents dealing with the possibility, likelihood or intention of filing ICM applications in any of those years.
4. [Application, p. 12] Please file the 2014-2018 capital plan.
5. [Application, p. 13] Please provide the most current estimate of the total capital budget for 2014, and any breakdown currently available of that budget.
6. [Application, p. 14] Please provide a table showing, using the same categories as Table 4-2 or additional categories if required, the Non-discretionary capital additions for each of 2009 through 2013, using actuals for 2009 through 2012, and current forecast (e.g. 10+2) for 2013.
7. [Application, p. 16] Please advise, for each of the categories of 2014 Non-Discretionary Capital Additions listed in Table 4-2, the amount in that category that is non-discretionary by reason of criterion 5 on the list of ICM criteria.

8. [Application, p. 16] *“If Powerstream does not obtain the requested ICM funding, it will have to reconsider the amount of capital spending and adjust to maintain its financial stability.”* Please prioritize all of the Non-Discretionary Capital Additions such that, for any given non-discretionary capital additions budget approved by the Board for ICM treatment, the parties can determine how much of each category will be spent in 2014. If it is easier to do this including discretionary capital as well, please prepare the prioritization for the entire capital budget, rather than just the non-discretionary component, but identify in the prioritization list which items are discretionary, and which are not.
9. [Application, p. 16] Please provide the “risk matrix chart” from Optimizer for all capital projects that was used to determine which projects that were considered “red risk”. Please include in the chart all projects that were considered, and their risk level, and not just those determined to be red risk.
10. [App. G-1] With respect to the Pole Replacement Program:
 - a. p. 1. Please provide the report from the inspection and testing program showing the need to replace 400 poles.
 - b. p. 1. Please confirm that PowerStream defines “poor” condition to be 60% capacity or less.
 - c. p. 2. Please advise the aggregate number of poles to be replaced, in all programs, in 2014.
 - d. p. 2. Please provide a table showing the total poles replaced each year in all programs for 2009 through 2013, and the total amount spent to do so. Please disaggregate in that table the # and \$ component that is through the Pole Replacement Program, rather than through other programs.
 - e. p. 3. Please provide the benchmarks used by the Applicant to determine the reasonableness of the installation costs listed in Table 1.
 - f. p. 3. Please confirm that the labour costs listed in Table 2 total more than 35% of the total costs of pole replacement. Please confirm that the cost per pole is unchanged from the 2013 COS application. Please confirm that no additional staff are being hired for, or assigned to, the Pole Replacement Program relative to 2013.
 - g. p. 4. Please advise how many of the Applicant’s 42,100 poles carry wires at 27.6 kV or higher.
 - h. p. 5. Please provide a table showing the number of catastrophic pole failures for each year from 2003 through 2012. Please either exclude, or disaggregate, failures caused by external causes, such as major storms or automobile strikes.

11. [App. G-2] With respect to the Cable Remediation Program:
- a. p. 1. Please provide the PowerStream document that sets out the multi-year Cable Remediation Plan.
 - b. p. 2. Please advise the expected remaining life of cables that are 26-30 years old, and explain how many years cable injection extends that life. By way of example, if cable with a 50 year life is injected after 30 years, is its life still 50 years (30+20), or is it extended to 70 years?
 - c. p. 4. Please confirm that all 119 km. of cable to be remediated in 2014 have been tested directly and show “advanced insulation degradation”. Please advise what percentage of that cable has already failed, if any.
 - d. p. 4. Please provide a table showing the number of km. of cable remediated and the cost, broken down by injection and by replacement, for each of the years 2009 through 2013.
 - e. p. 6. Please provide details of the first two projects on Table 3, which are also listed on Table 2, and show a breakdown of the total budgets for both injection and replacement for those two projects.
 - f. p. 7. Please restate Table 4 on the basis of failures per 100 km of line, by year. Please confirm that the Applicant has not introduced any material changes in how primary cable and splice failures are calculated or measured in the period 2005 through 2014.
12. [App. G-3] With respect to the Switching Units and Transformers Replacement Program:
- a. p. 1. Please provide details on the “calculated asset health index” referred to.
 - b. p. 3. Please confirm that all submersible transformers have been classified as “poor” condition in 2014.
 - c. p. 4. Please confirm that there are no padmount transformers classified as Code A. Please advise how many are classified as Code B, and how the Applicant determined which of those should be replaced in 2014.
 - d. p. 4. Please provide a table showing switchgear failures as a percentage of the total number of switchgear in the system, for the period 2005 through 2012.
 - e. p. 6. Please provide a table showing, for each of the four projects listed in Table 1, the number of units replaced, and the total cost, for each of 2009 through 2013.

13. [App. G-4] With respect to the Station and Automated Switch Equipment Replacement Program:
 - a. p. 1. Please advise why, unlike other asset categories, there is no category for this equipment that applies to healthy equipment.
 - b. p. 4. Please provide the normal expected life of the equipment to be replaced in Markham TS#1. If the life is longer than the 27 years to date, please explain why this equipment requires early replacement.
14. [App. G-5] Please provide a table showing the total km., and the cost, for capacity relief projects for each of 2009 through 2013.
15. [App. H-2, p. 4] Please provide information on the source and development of the budgets for the YRRT projects. Please explain each of the three marginal notes for those projects in Table 1.
16. [App. H-3] With respect to the Mandated Service Obligations:
 - a. p. 3. Please confirm that the personnel who normally did re-verification in 2007 through 2011 were included in the Applicant's cost of service for those years. Please confirm that the work those personnel did on smart meters was not included in the amounts recovered by the Applicant from ratepayers for the smart meter program.
 - b. p. 3. Please confirm that the IConF meters are being replaced prior to the end of their originally anticipated useful life.
 - c. p. 4. Please provide the document setting out the "ten year replacement strategy".
17. [App. H-5, p. 4] Please explain why upgrading the website is considered to be non-discretionary.

Submitted on behalf of the School Energy Coalition this 18th day of November 2013.

Jay Shepherd
Counsel for School Energy Coalition