

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

**AND IN THE MATTER OF** applications by Peterborough Distribution Inc., 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 \$94.15 per month for electricity distribution under the current proposed 2007 rates (including the proposed Z-factor adder), an increase of 2.8% over 2006;
  
  - b) that a school with monthly demand of 200KW in the General Service > 50 KW would pay approximately \$679.32 per month for electricity distribution under the current proposed 2007 rates (including the proposed Z-factor adder), an increase of 1.2% over 2006;
  
3. Please advise:
  - a) whether the company owns or operates any electricity transmission facilities within its service territory;
  
  - b) if yes, whether there was any damage to the transmission system as a result of the July 17, 2006 thunderstorm;
  
  - c) if yes, please describe and justify the methodology used to allocate storm damage cost to the company's transmission division;

Ref: Appendix A "2006 Storm Damage" Report

4. The Applicant refers to the "mutual aid agreement" for additional line crews, local electrical contractors and tree trimming crews. Please identify the member utilities and outline the provisions of the service agreement.

5. In the Manager's Summary dated March 11, 2007, the Applicant has stated that "the greatest concentration of damage was centred around Newmarket, Scugog Lake and the Kawartha Lakes region".

On page 12 of Appendix B of the application, it was mentioned that in addition to the area of Newmarket and Peterborough, "Cobden, Sudbury, North Bay, Mattawa and New Liskeard" areas were also affected, with "large pockets of outages".

On page 2 of Appendix A "2006 Storm Damage" Report, it has been identified that 2 days after the storm (July 19, 2006), the utility had approximately 800 customers (2.4%) still without power. On page 12 of Appendix B of the application, it has been identified that 3 days after the storm (July 20), there were 10,000 customers without power in the area of Cobden, and 9,000 customers without power in Subdury.

On page 8 of Appendix B, it was referred that the storm in Peterborough was close to but "not a tornado". Newmarket was however assessed by the Environment Canada team as the site of "a probable tornado".

Please advise:

- a) whether the Applicant is aware of any storm contingency plans implemented by other neighbouring utilities affected by the same storm;
  - b) if yes, please outline the storm recovery initiatives undertaken by these neighbouring utilities;
  - c) whether the Applicant is aware of the magnitude of the damages to the electrical systems owned and operated by the neighbouring utilities that were also affected by the same storm during the period;
  - d) to the best knowledge of the Applicant, how did other identified neighbouring utilities affected by the same storm deal with the additional costs of damage to ratepayers;
6. Please explain:
    - a) why the Applicant is only requesting 86% (\$375K) of the total costs (\$437K) to be recovered;
    - b) confirm that the difference (\$62K) is directly associated with the damage;
    - c) the accounting treatment of the \$62K difference proposed by the company.
  7. Please justify why the Z-factor amounts should be recovered through the company's 2007 Smart Meter rate adder;
  8. Please provide, for overtime labour 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. Please provide the respective hourly overtime labor rate.

9. Please provide, by each member LDC and outside contractors, a breakdown of the costs claimed into the following components: labor, material, equipment and other costs;
10. Please provide copy of invoices issued to the company by the member LDCs and contractors directly engaged in the restoration efforts.
11. Please explain if the company carries any insurance on its distribution system against events of this nature.
  - a) If yes, please file a copy of the insurance policy, advise the process of the company's insurance claim in connection with the event, file a copy of the property damage report prepared by the insurance adjuster evaluating the damage, and provide an estimate of the proceeds from the claim;
  - b) If no, please explain why.
12. Please provide the audited financial statements of the Applicant for each of the most recent three years.