



Jay Shepherd

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BY EMAIL and RESS

June 17, 2014
Our File: EB20130326

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2013-0326 – Ontario Power Authority 2014 Fees – SEC Interrogatories

We are counsel to the School Energy Coalition ("SEC"). Enclosed please find interrogatories on behalf of SEC.

Yours very truly,
Jay Shepherd P.C.

Original signed by

Mark Rubenstein

cc: Wayne McNally, SEC (by email)
Applicant and intervenors (by email)

IN THE MATTER OF sections 25.20 and 25.21 of the *Electricity Act, 1998*;

AND IN THE MATTER OF a Submission by the Ontario Power Authority to the Ontario Energy Board for the review of its proposed expenditure and revenue requirement for the year 2014.

INTERROGATORIES
ON BEHALF OF THE
SCHOOL ENERGY COALITION

[Note: All interrogatories have been assigned to issues. However, please provide answers that respond to each question in full, without being restricted by the issue or category. Many interrogatories have application to multiple issues, but all have been asked only once to avoid duplication.]

1.1-SEC-1

[B1-1-1/p.8] What is the budget for the customer call centre? Does the OPA operate the call centre itself, if not, please provide of the arrangement.

1.1-SEC-2

[B1-1-1/p.18] Please complete the following table:

Major Cost Category	2011 Board Approved	2011 Actual	2012 Actual	2013 Actual	2014 Budget
Compensation & Benefits					
Professional & Consulting Fees					
Conservation/Technology Funds					
Operation and Administration Expenses					
Total Operation Costs Before Allocation					
Shared Services Allocation Expenses					
Total Operating Costs After Allocation					

2.1-SEC-3

[B1-2-1/p.7] Please complete the following table:

Major Cost Category	2011 Board Approved	2011 Actual	2012 Actual	2013 Actual	2014 Budget
Compensation & Benefits					
Professional & Consulting Fees					
Operation and Administration Expenses					
Total Operation Costs Before Allocation					
Shared Services Allocation Expenses					
Total Operating Costs After Allocation					

3.1-SEC-4

[B1-3-1/p.16] Please complete the following table:

Major Cost Category	2011 Board Approved	2011 Actual	2012 Actual	2013 Actual	2014 Budget
Compensation & Benefits					
Professional & Consulting Fees					
Operation and Administration Expenses					
Total Operation Costs Before Allocation					
Shared Services Allocation Expenses					
Total Operating Costs After Allocation					

4.1-SEC-5

[B1-4-1/p.2, 10, 25] Please complete the following table for each of the i) CEO's Office, ii) Business Strategies and Solutions, and iii) Legal, Aboriginal and Regulatory Affairs groups.

Major Cost Category	2011 Board Approved	2011 Actual	2012 Actual	2013 Actual	2014 Budget
Compensation & Benefits					
Professional & Consulting Fees					
Operation and Administration Expenses					
Total Operating Costs					

4.1-SEC-6

Does the 'Professional & Consulting Fees' line item for all budgets excluding the Legal, Aboriginal and Regulatory Affairs groups, include external legal counsel related to initiatives contained with that goal?

4.1-SEC-7

[B-4-1/p.4, 12] Please provide copies of all i) internal audits reports , and ii) value for money audit reports, conducted since 2011.

5.1-SEC-8

[B1-5-1/p.3] Please provide minutes from the OPA's Stakeholder Advisory Committee meetings.

51-SEC-9

[B1-5-1/p.9] [B1-3-1/p.16] Please complete the following table:

Major Cost Category	2011 Board Approved	2011 Actual	2012 Actual	2013 Actual	2014 Budget
Compensation & Benefits					
Professional & Consulting Fees					
Operation and Administration Expenses					
Total Operating Costs					

6.1-SEC-10

[A-2-2-/p.11] Please provide a copy of the Minister's Letter dated October 22, 2013.

6.1-SEC-11

[A-2-2-/p.11] The CEO's Letter to the Minister, dated January 23, 2014, states that the OPA is committed to further reductions in 2015 and 2016. Considering that the OPA has not historically had an application for approval of its usage fee every year, how can ratepayers be assured that these savings will be passed on in full?

6.1-SEC-12

[A-2-3/p1] Please provide details of the \$2.5M reduction in the operation budget referenced in the Minister's Letter dated January 29, 2014.

6.1-SEC-13

[A-4-1/p.2-8] For each Director level position at the OPA, please provide how many employees work in that business unit.

6.1-SEC-14

[C-2-1] Please provide an employee compensation breakdown in the form of Appendix 2-K (*Filing Requirements For Electricity Distribution Rate Applications*, dated July 17 2013).

6.1-SEC-15

[C-2-1] Please provide a status of negotiating the first collective agreement between the OPA and Society of Energy Professionals. Please provide the increase in compensation in 2014 that the OPA is projecting based on the outcome of those negotiations for the purposes of this application.

6.4-SEC-16

[B1-5-1/p.3, C-3-1] Considering that ultimately procurement and conservation activities are funded by ratepayers, how have the OPA engaged ratepayers, and ratepayer organizations, in developing its plans? How does the OPA plan to improve on this in 2014?

6.4-SEC-17

[C-3-1] With respect to its stakeholder engagement activities, Please explain why the OPA does not post copies of written submissions it receives, or notes of in-person meetings, as the IESO and OEB does for its consultation activities?

6.4-SEC-18

[EB-2010-0279 Decision] Why has the OPA not sought to recover a fee from export customers in this application?

Submitted by the School Energy Coalition on this 17th of June, 2014.

Original signed by

Mark Rubenstein
Counsel for the School Energy Coalition