



Jay Shepherd

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BY EMAIL and RESS

July 24, 2014
Our File: EB20140083

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2014-0083 – Hydro One Brampton Networks Inc. – 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 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 Hydro One
Brampton Networks Inc. for an Order or Orders approving or
fixing just and reasonable rates and other service charges for the
distribution of electricity as of January 1, 2015.

INTERROGATORIES
ON BEHALF OF THE
SCHOOL ENERGY COALITION

1-SEC-1

[Ex.1-5-1] Please explain how each of the specific productivity initiatives will result in sustainable savings.

1-SEC-2

[Ex.1-5-1] Please provide copies of all benchmarking surveys, studies, and analysis conducted by the Applicant internally, or through a third-party, since 2011.

1-SEC-3

[Ex.1-6-1] Please explain how customer preferences were incorporated into this Application.

1-SEC-4

[Ex.1] Does the Applicant have a corporate scorecard? If so, please provide a copy of the 2013 and 2014 scorecards.

1-SEC-5

[Ex.1-7-1/p.6] Please update Table 1 with the most recent Global Insight forecast.

1-SEC-6

[Ex.1-9-15] Please provide a copy of all information provided to the Applicant's Board of Directors, and Hydro One Inc.'s Board of Directors, in approving this application and the underlying budgets.

1-SEC-7

[Ex.1-9-15] Please explain the Applicants governance structure as it relates to report to both its own Board of Directors as well as the Hydro One Inc. Board of Directors.

2-SEC-8

[Ex.2-5-1/p.10] Please explain the significant decrease in capital expenditures in 2016-2019 compared to the Test Year.

2-SEC-9

[Ex.2-5-1/p.10] For the purposes of Distribution System Plan, how did the Applicant forecast its capital expenditures for 2016-2019?

2-SEC-10

[Ex.2-5-1/p.16-20] For each material 2015 Capital Project, please provide the projected in-service month.

2-SEC-11

[Ex.2-5-3] For each material 2014 Capital Project, please provide the projected in-service month.

2-SEC-12

[Ex.2-6/p.50-51] Regarding the Applicant's Investment Prioritization and Selection:

- a) Please explain the process of determining the scope for each Benefit Criteria.
- b) Please explain the process of determining the score for each Risk Criteria.
- c) Please provide further details explaining the Reputation risk category.
- d) Please provide the total Project Benefit and Project Risk score for each Test Year project included in Appendix A of the Distribution System Plan.

2-SEC-13

[Ex.3-1-1/p.7-8] Please provide a table showing the total HDD and CDD for each year between 1993 and 2004.

3-SEC-14

[Ex.3-3-1/p.1] Please revise Tables 1 to include year-to-date actuals.

4-SEC-15

[Ex.4-4-1/p.3] Please update Table 3 to include year-to-date actuals.

4-SEC-16

[Ex.4-2-1/p.13] Please explain the significant variability in Overhead Lines Maintenance between 2012 and 2014

4-SEC-17

[Ex.4-2-1/p.38] Please explain the significant increase in Community Relations between 2012 and 2014.

4-SEC-18

[Ex.4-2] Please provide the percentage of customers, for each customer class, the Applicant bills monthly.

4-SEC-19

[Ex.4-3-1] Please provide a copy of the Applicant's current collective agreement with Unifor and the IBEW.

4-SEC-20

[Ex.4-3-1/p.3] Please provide a copy of the Hay Group review of management compensation.

4-SEC-21

[Ex.4-3-1/p.10] Please provide the rationale for all new positions created since 2012.

4-SEC-22

[Ex.4-3-1/p.25] Please provide details about the individual performance measures.

4-SEC-23

[Ex.4-3-1-Appendix 5] What conclusions does the Applicant draw from the Towers Watson Non-Pension Post-Retirement Benefit Plan Actuarial Valuation Report?

4-SEC-24

[Ex.4-3-2p.1] Please explain the decrease in Finance (CCF&S) costs since 2011.

5-SEC-25

[Ex.5] Please provide the Applicant's actual regulatory ROE for 2011-2014.

5-SEC-26

[Ex.5-2-1/p.1] Please provide an update on the forecasted 2014 debt issuance.

8-SEC-27

[Ex.8/1/1] Considering the Board's Draft Report in EB-2012-0410 does not propose fixed rate design for classes other than residential and GS < 50, please explain why the Applicant is proposing to increase the fixed/variable split for other rate classes.

Submitted by the School Energy Coalition on this 24th day of July, 2014.

Original signed by

Mark Rubenstein
Counsel for the School Energy Coalition