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BY EMAIL and RESS

August 19, 2014
Our File: EB20140113

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2014-0113 – St. Thomas Energy 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)

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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 St. Thomas
Energy 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

Please provide a copy of all documents that were provided to the Applicant's Board of Directors in approving this application and the associated Test Year budget.

1-SEC-2

[Ex.1-5-1/p.4] Please provide the most recent audited financial statements of the Ascent Group Inc.

1-SEC-3

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

1-SEC-4

Please details of all productivity initiatives the Applicant has undertaken since 2011. Please provide details of all productivity initiatives the Applicant plans to do in the Test Year.

1-SEC-5

Please provide all customer feedback and preferences received, by customer class, with respect to the Applicant's proposed Test Year:

- a. Capital expenditures
- b. OM&A expenses

1-SEC-6

[Ex.1-5-1/p.19] Was the Applicant's smart meter expenses and amortization costs recorded in 2012, actually incurred in 2012? If not, please provide a breakdown of the years these costs were actually incurred.

2-SEC-7

[Ex.2-1-6] Please provide the forecasted in-service date for all 2014 and 2015 material capital projects.

2-SEC-8

[Ex.2-1-6] Please explain the Applicant's internal approval process for material capital projects.

2-SEC-9

[Ex.2-1-6/p.12] Please explain how the Applicant forecasted Test Year capital contributions.

2-SEC-10

[Ex.2] Please provide a list of asset categories that the Applicant runs to failure.

3-SEC-11

[Ex.3-1-6/p.4] Please add a column to Appendix 2-H which provides year-to-date actuals for 2014.

4-SEC-12

[Ex.4-1-1/p.3] Please explain the basis for assuming a 2.1% inflation increase for the Test Year.

4-SEC-13

[Ex.4-1-1/p.6] With respect to the Utility Collaborative Service:

- a. Please provide a list of other participating LDCs.
- b. Please explain how costs are allocated between members/participants.
- c. Please provide a copy of the agreement between the Applicant and Utility Collaborative Service.

4-SEC-14

[Ex.4-1-1/p.7] Besides applying for a Roving Energy Manager position, please provide details about how has the Applicant utilized to date or plan to utilize in the Test Year, any of the other group collaborative efforts listed on lines 5-8.

4-SEC-16

[Ex.41-2/p.14] Please explain how the Applicant is showing continuous improvement in cost effectiveness if its OM&A/customer measure is increasing faster than inflation.

4-SEC-17

[Ex.4-1-2/p.16] Please revise table 4.7 showing actual OM&A/customer for 2013 based on the Board's Yearbook of Electricity Distributors (issued August 14, 2014).

4-SEC-18

[Ex.4-1-3/p.1] Please revise Appendix 2-JC to show an added column for 2014 year-to-date actuals.

4-SEC-19

[Ex. 4-1-4/p.2] Please provide a copy of the latest MEARIE study.

4-SEC-20

[Ex.4-1-4/p.2] Please provide an update on the status of the Applicant's negotiations with the IBEW on a new collective agreement. Please provide a copy of the most recent collective agreement.

4-SEC-21

[Ex.4-1-4/p.3] Please provide a copy of the 2012 Cyr & Associates study.

4-SEC-22

[Ex.4-1-4/p.3] Please provide a copy of the Applicant's Incentive Compensation Plan? Please provide a copy of the corporate objectives/goals targets for 2013 and 2014.

4-SEC-23

[Ex.4-1-4/p.5] Please provide the 2011 information for Appendix 2-K using the methodology utilized by the Applicant in its 2011 cost of service application (see EB-2010-0, Ex. 4-4-1).

4-SEC-24

[Ex.4-1-4/p.5] Please provide a revised Appendix 2-K with two additional rows on the bottom, dividing the total amount of compensation costs in each column into the amounts allocated to OM&A and to capital.

4-SEC-25

[Ex.4-1-5/Attachment 1] Has the Applicant's service agreement with AESI being changed to account for the results of the Service Cost Benchmarking undertaken by PwC? If so, please provide details.

5-SEC-26

Please provide the actual regulated ROE for each year since 2011.

Submitted by the School Energy Coalition on this 19th day of August, 2014.

Original signed by

Mark Rubenstein
Counsel for the School
Energy Coalition