



Jay Shepherd

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BY EMAIL and RESS

September 22, 2014
Our File: EB20140238

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2014-0238 – Great Lakes Power Transmission – 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 Great Lakes
Power Transmission LP for an Order or Orders approving just and
reasonable rates and other service charges for the transmission of
electricity, effective January 1, 2015.

INTERROGATORIES
ON BEHALF OF THE
SCHOOL ENERGY COALITION

1-SEC-1

Does the Applicant or one of its corporate affiliates/parents produce a Business Plan or similar type of document for the Applicant's operations? If so, please provide a copy.

1-SEC-2

[Ex.1-5-11] Please explain the Applicant's governance structure, with specific emphasis on the approval of its annual budget and rate applications.

2-SEC-3

[Ex.2-1-1-p.4,15] With respect to the Wood Structure Replacement program:

- (a) Please provide the forecasted and actual budgets for the program for each year between 2012-2014.
- (b) Please provide the number of wood structures replaced, by type, for each year between 2012-2014 .

2-SEC-5

[Ex.2-1-1-p.8] With respect to the Highway 101 TS 44kv Upgrade project:

- (a) Please provide the number and duration of outages at the Highway 101 TS for each year between 2008-2014.
- (b) Please provide details regarding the average standard of performance and minimum standard of performance for each year between 2008-2014.

2-SEC-6

[Ex.2-1-1-] Please provide the forecasted in-service date for all material capital projects in 2014, 2015, and 2016.

2-SEC-7

[Ex.2-1-3] Please provide a copy of the 2010 Navigant lead lag study.

4-SEC-8

[Ex.4-2-1-Appendix A] Please provide a list of all other transmission companies that are part of the First Quartile Consulting cost analysis.

4-SEC-9

[Ex.4-2-1-p.3] Please explain why the Applicant believes it is appropriate to forecast its 2015 and 2016 inflation rate based on inflation data from 2009-2013? Does the Applicant have any information from any source regarding forecasted inflation rates for 2015 and 2016? If so, please provide details.

4-SEC-10

[Ex.4-2-1] Please detail all productivity initiatives that the Applicant has undertaken in 2013 and 2014, any forecasting to undertake in 2015 and 2016. Please detail the expected cost savings from these initiatives.

4-SEC-11

[Ex.4-2-1-p.14] Please provide the rationale for the proposed Compliance Analyst position.

4-SEC-12

[Ex.4-2-1-p.17] What percentage of the Applicant's employees historically retire within the first year of their eligibility?

4-SEC-13

[Ex.4-2-3-p.7] Please provide a copy of the Navigant report referenced.

4-SEC-14

[Ex.6-1-2-p.3] Please provide information to support the reasonableness of the quantum of the Comstock Claim costs.

4-SEC-15

[Ex.6-1-2-p.13] Please provide details to support the reasonableness of the Applicant incurring \$54,972 in legal costs in support of the East-West Tie Line designation process.

Submitted by the School Energy Coalition on this 22nd day of September, 2014.

Original signed by

Mark Rubenstein
Counsel for the School Energy Coalition