



Jay Shepherd

Professional Corporation
2300 Yonge Street
Suite 806, Box 2305
Toronto, ON M4P 1E4

BY EMAIL and RESS

October 3, 2014
Our File: EB20140086

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2014-0086 – Innisfil Hydro Distribution Systems Ltd. – 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)

T. (416) 483-3300 F. (416) 483-3305

mark.rubenstein@canadianenergylawyers.com

www.canadianenergylawyers.com

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 Innisfil Hydro
Distribution Systems Limited 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

SEC-1

[p.51] Please provide a copy of the Applicant's formal business case for the new facility.

SEC-2

[p.51] Please provide a copy of all materials provided to the Applicant's Board of Directors in approving the proposed Corporate Headquarters and Operations Facility.

SEC-3

[p.51 and Exhibit 2, p.57] Please reconcile the significant difference in the total costs of each site option in the McKnight analysis, with the total estimated capital cost in the application.

SEC-4

[p.53] The evidence states that the Applicant plans to demolish the its old facility and sell 2.07 acres of the land for \$925k.

- a) What is the total size of the plot of land in which the old facility sits? If the amount is greater than 2.07 acres, please explain why the Applicant is not planning to sell the entire plot.
- b) Has the Applicant incorporated an offset to its ICM to account for the \$925K revenue from the sale? If so, please provide details of the offset calculation. If not, please explain the rationale.

SEC-5

[p.53] Please provide a copy of the "twenty year plan".

SEC-6

[p.54] Please provide information to support the application that the proposed Corporate Headquarters and Operations Facility design is appropriate and cost-effective.

SEC-7

[p.54] Please provide the design requirements and expectations provided to the architect for the design of the building.

SEC-8

[p.54] Regarding the size of the new the proposed Corporate Headquarters and Operations Facility:

- a) Please provide the full architectural layout.
- b) What is the total square feet of the proposed facility?
- c) Why is 250 square feet per person an appropriate standard considering a significant portion of the Applicant's employees do not primarily work in doors.
- d) What is the actual square feet per person of new facility?
- e) Please provide the i) gross square feet per employee, ii) capital cost per employee, and ii) capital cost/gross square feet.

SEC-9

[p.55] Has the Applicant incorporated the estimated leasing revenue as an offset to the amount sought to recover in this ICM application? If so, please provide details of the offset calculation. If not, please explain the rationale.

SEC-10

[p.55] Regarding the estimated leasing revenue, please provide details regarding how the Applicant determined the estimated square footage and leasing rate per square foot.

SEC-11

Please provide the Applicant's actual regulated ROE for 2013 and forecasted regulated ROE for 2014.

Submitted by the School Energy Coalition on this 3rd day of October, 2014.

Original signed by

Mark Rubenstein
Counsel for the School
Energy Coalition