

PUBLIC INTEREST ADVOCACY CENTRE LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

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> Michael Janigan Counsel for VECC

October 03, 2014

VIA MAIL and E-MAIL

Ms. Kirsten Walli Board Secretary Ontario Energy Board P.O. Box 2319 2300 Yonge St. Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: Vulnerable Energy Consumers Coalition (VECC) VECC Interrogatories EB-2014-0086 Innisfil Hydro Distribution Systems Limited

Please find enclosed the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Thank you.

Yours truly,

Michael Janigan Counsel for VECC

cc: Innisfil Hydro Distribution Systems Limited

ONTARIO ENERGY BOARD

IN THE MATTER OF

the Ontario Energy Board Act, 1998, S.O. 1998, c. 15 (Schedule B), as amended;

AND IN THE MATTER OF an Application by

Innisfil Hydro Distribution Systems Limited pursuant to section 78 of the Ontario Energy Board Act for an order or orders approving or fixing just and reasonable rates and other charges for the distribution of electricity to be effective January 1, 2015.

Information Requests of the Vulnerable Energy Consumers Coalition (VECC)

Incremental Capital Module

VECC-1

Ref: 3.3.1 Incremental Capital Module

<u>Preamble:</u> Innisfil Hydro indicates that staff growth requirements are expected to be 75 FTEs in 2031 compared to 30 FTEs in 2009 and the customer base of 14,500 is expected to grow to 38,000 customers by 2031.

a) Please summarize the basis for these growth assumptions.

VECC-2

Ref: 3.3.1 Incremental Capital Module

- a) Page 44 Please confirm the address & relative location, size (square footage) and utilization of each of the existing 5 non-contiguous buildings.
- b) Page 51 Please confirm the scope of work/investigation that was undertaken by McKnight Sharron Laurin Architects.
- c) Page 51- Please confirm the origin of the five options and discuss if any other options have been considered.
- d) Page 51 please confirm the address of option 5.
- e) Page 51 Please confirm Old Town Hall is the same as Innisfil Town Administration campus on Innisfil Beach Road.

- f) Page 51 Please discuss the criteria used to evaluate the 5 options and the weighting given to each criterion.
- g) Page 52 Please discuss the efficiencies and economies of scale that could be achieved by remaining contiguous with the Town of Innisfil Parks and Roads cluster.
- h) Page 52 Please provide the specific details of the land swap with Innisfil Hydro and the Town of Innisfil and the discuss the impact on option 5 and the impact on the purchase agreement to sell 2.07 acres at the existing Innisfil Hydro site and purchase 3.5 acres at the Old Town Hall site
- i) Page 52 Please confirm the Yonge Street property and how it relates to option 5.
- j) Page 54 Please explain why the sale of the property for 2061 and 2073 Commerce Park Drive will not be finalized until February 2015. Please discuss when the property will be vacant and what the final carrying costs on the property will be once it is vacated.
- k) Page 55 Please provide the details (assumptions and analysis) to support leasing options that are anticipated to materialize in July 2015.
- Page 57 Please provide a schedule showing Innisfil Hydro's discretionary and nondiscretionary capital projects for the years 2012 to 2015.

VECC-3

Ref: Exhibit 2

a) Please discuss more fully the cons of option 5.