



Jay Shepherd

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BY EMAIL and RESS

October, 21, 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 Supplementary IRs

We are counsel to the School Energy Coalition (“SEC”). Enclosed, please find supplementary 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.

SUPPLEMENTARY INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

2-SEC-16

[2-EP-5] Please provide any formal analysis undertaken by the Applicant that demonstrates that “[r]emaining with the same provider for the financial system will meet GLPT’s need and reduce overall cost of the project as it will not require transition for the financial module of the ERP.”

4-SEC-17

[4-Staff-25, Ex. 2-1-1p.28] Please explain the variance between the 2013-2014 forecasted amounts sought in the EB-2012-0300 application, and the 2013-2014 actuals.

4-SEC-18

[4-Staff-26(b)] Based on the latest information available, what would be the total redemption cost?

4-SEC-19

[6-Staff-27, 4-SEC-14] With respect to the legal fees incurred:

- a) Please provide the total hours billed and counsel’s average hourly rate.
- b) If the action proceeds to trial, please provide the Applicant’s best estimate of total costs that may be incurred.

4-SEC-20

[4-SEC-10] Please provide the forecasted cost savings in each of 2015 and 2016, as a result of productivity initiatives undertaken (or forecasted to be undertaken) in each of 2013, 2014, 2015 and 2016.

4-SEC-21

[4-VECC-16] For each year between 2012-2014, please provide the total incentive pay that potentially could have been paid out. Please provide a forecast amount of possible incentive pay that could be paid out for 2015-16.

Submitted by the School Energy Coalition on this 21st day of October, 2014.

Original signed by

Mark Rubenstein
Counsel for the School Energy Coalition