



Jay Shepherd

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BY EMAIL and RESS

January 23, 2015
Our File: EB20140311

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2014-0311 – NWBTL Deferral Account – 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*, S.O. 1998, c.15 (Schedule B);

AND IN THE MATTER OF an Application by Hydro One Networks Inc. for an accounting order to establish a deferral account.

INTERROGATORIES
ON BEHALF OF THE
SCHOOL ENERGY COALITION

1. When did Hydro One for the first time become aware that it would likely need to undertake development activities for the North West Bulk Transmission Line between 2014-2016? Please provide details and supporting documentation.
2. Please explain why any development cost, or a deferral account to record any development costs, was not included in Hydro One's 2015-16 Transmission 'Proposed Application' (Section III, Hydro One Pre-filed Evidence and Application in EB-2014-0140).
3. Did Hydro One provide notice to signatories of the EB-2014-0140 Settlement Agreement before that application was filed with the Board, that it would be bring this (or a similar) application before this Board for a Deferral Account to record development work conducted in 2015 and/or 2016 relating to the North West Bulk Transmission Line? If so, please provide details and supporting documentation.
4. Is Hydro One seeking to record any development costs in the proposed Deferral Account between the date of the filing of the application (October 3, 2014) and the date of any Board final approval of the application?
5. Please provide an estimate of the amount that may be recorded in the proposed Deferral Account, for each of 2014, 2015 and 2016.
6. Please provide copies of all references to the North West Bulk Transmission Line in the Hydro One's EB-2012-0031 and EB-2014-0140 application.
7. Please explain how the proposed deferral account meets each of the following criteria:
 - a) Causation;
 - b) Materiality; and
 - c) Reasonableness.

Submitted by the School Energy Coalition on this 23rd day of January, 2015.

Original signed by

Mark Rubenstein
Counsel for the School
Energy Coalition