



Jay Shepherd

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BY EMAIL and RESS

April 2, 2015
Our File: EB20130421

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2013-0421 – Hydro One SECTR Phase 2 – 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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ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act 1998*, S.O. 1998, c.15, Schedule B;

AND IN THE MATTER OF Phase 2 of an application by Hydro One Networks Inc. for an order or orders pursuant to section 92 of the *Ontario Energy Board Act, 1998* granting leave to construct transmission line facilities in the Windsor Essex Region, Ontario.

**INTERROGATORIES ON BEHALF
OF THE
SCHOOL ENERGY COALITION**

SEC-1

[B-4-4, p.8-9] Did the OPA (now IESO) consider any other methods for apportioning costs between load customers and transmission customers? If so, please provide details and reasons for why they were ultimately not recommended.

SEC-2

[B-4-4, p.8-9] Based on current wording of the Transmission System Code, please provide the apportioning of costs and supporting calculations.

SEC-3

[B-4-4, p.8-9] Please explain how the OPA (now IESO) estimate the \$22.5M cost for transmission updates.

SEC-4

[B-4-5, p.2] Did Hydro One and the affected distributors ever discuss alternative approaches to the allocation between themselves? If so, please provide details.

SEC-5

[B-4-5, p.3] Do the capital contributions from new large customers include only new customers, or does it also include increased demand or physical expansions of existing large customers?

SEC-6

[B-4-5, p.6-8] Did Hydro One consider any other method for apportioning costs between distributors? If so, please provide details and reasons for why there were ultimately rejected.

SEC-7

[B-4-5, p.3] Does Hydro One believe that there may be other potential distributors who may benefit at some future date from the proposed project? If so, how does Hydro One proposed to allocate costs to them?

SEC-8

[B-4-5, p.6-8] Is Hydro One proposing the Board approve the method of cost allocation between distributors existing ratepayers and any of its new large customers, in this application?

Submitted by the School Energy Coalition on this 2nd day of April, 2015.

Original signed by

Mark Rubenstein
Counsel for the School Energy Coalition