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BY EMAIL and RESS

November 24, 2015
Our File: EB2015107

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2015-0107 – Wasaga Distribution Inc. 2016 – 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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EB-2015-0107

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 an Application by Wasaga Distribution Inc. for an Order approving rates and other service charges for the distribution of electricity as of May 1, 2016.

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

1-SEC-1
[Ex.1] Please provide a copy of all materials provided to the Board of Directors in approving this application, and the underlying Test Year budgets. Please also provide a copy of the Applicant's most recent Business Plan.

1-SEC-2
[Ex.1] Does the Applicant have a corporate scorecard or similar document? If so, please provide the 2014 and 2015 versions.

1-SEC-3
[Ex.1] Please provide copies of all benchmarking studies, reports and analysis, that the Applicant has undertaken or participated in since 2012, that are not already included in this application.

1-SEC-4
Please provide details of all efficiency and productivity measures the Applicant has undertaken since its last rebasing application. Please quantify those savings and provide all assumptions made in doing so.

1-SEC-5
[Ex.1, p.83] Please provide a step-by-step explanation of the Applicant's budgeting process. Please provide any internal budget guidance documents that were issued.

1-SEC-6
[Ex.1, p.51] Did the Applicant's customer engagement activities directly affect any expenditures sought in this Application? If so, please provide details.

1-SEC-7
[Ex.1, p.54] Please provide a full copy of the results of the online 'Survey Money' survey document.

1-SEC-8
[Ex.1, Attach B] Is the Applicant able to disaggregate the CHEC results in the Utility Pulse Survey to show Wasaga Distribution's results only? If so, please provide that information.

2-SEC-9
[Ex.2-3-2, p.35] Please provide details of the "basis analysis of a Lead Lag Study" that the Applicant is undertaking. Who is undertaking this analysis? When was this analysis commissioned and when is it expected to be completed and filed?

2-SEC-10
[Ex.2] Please provide a step by step description of how the Applicant builds a cost estimate for its capital projects.

2-SEC-11
[Ex.2, Attach A] Has the Applicant had its asset condition assessment methodology reviewed by a third-party? If so, please provide that assessment.

2-SEC-12
[Ex.2, Attach A, p.38] Please confirm that the only inputs into the asset condition assessment for distribution transformers are a) age, and b) loading. If this is confirmed, please explain why this would lead to an accurate assessment of <u>actual</u> asset condition of the Applicant's distribution transformers.

2-SEC-13
[Ex.2, Attach A, p.46] Please confirm that the only inputs into the asset condition assessment for poles are a) age, and b) stress. If this is confirmed, please explain why this would lead to an accurate assessment of <u>actual</u> asset condition of the Applicant's poles.

2-SEC-14
[Ex.2, Attach A, p.46] Please provide the number of pole failures in each of the past 4 years.

2-SEC-15
[Ex.2, Appendix 2-AA] Please provide the in-service data for each 2015 and 2016 material capital project.

2-SEC-16
[Ex.2, Attach A] With respect to reactive maintenance and capital costs, for each year from 2012-2020, please provide:

a. reactive maintenance costs
b. reactive based capital costs

2-SEC-17
[Ex.2, Appendix 2-AB] Please provide 2015 year-to-date actuals.

4-SEC-18
[Ex.4, p.24] Please provide on the same basis as Appendix 2-JC:

a. 2015 year-to-date amounts
b. the 2014 amount at that point in the year as provided in (a)

4-SEC-19
[Ex.4, p.29] Please explain why the Applicant does not provide management with any portion of its compensation to be delivered in incentive pay.

4-SEC-20
[Ex.4, p.30] Please provide a version of Appendix 2-K which shows employees categorized between unionized and non-unionized.

4-SEC-21
[Ex.4, p.30] Please provide two additional rows to Appendix 2-K to show, for each year, the amount of compensation costs allocated to OM&A and capital.

7-SEC-22
[Ex.7, Appendix 2-P] Please explain why the Applicant is proposing to adjust the revenue to cost rations for the GS>50.

9-SEC-23
[Ex.9, p.24] Please provide the rationale for the request for the new deferral/variance account.

Respectfully submitted on behalf of the School Energy Coalition this November 24th, 2015.

Original signed by

Mark Rubenstein
Counsel for the School Energy Coalition