

**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 Enersource Hydro Mississauga Inc. for an Order or Orders approving just and reasonable distribution rates and other service charges for the distribution of electricity, effective January 1, 2016.

**INTERROGATORIES**  
**FROM THE**  
**SCHOOL ENERGY COALITION**

**Tab 2 – Manager’s Summary**

**2-SEC-1**

[Tab 2, p. 2] Please provide all information available to the Applicant explaining why the Application, including an extensive ICM claim, was not filed until August 17, 2015, and the ICM supporting information was not filed until October 2, 2015. Please confirm that the Applicant is still seeking rates effective January 1, 2016.

**2-SEC-2**

[Tab 2, p. 5] Please discuss the advantages and disadvantages to the customers of clearing the deferral and variance accounts over one year, as opposed to a different time period, with particular regard to the rate impacts on individual customer classes.

**2-SEC-3**

[Tab 2, p. 16] Please provide the most recent Strategic Plan, and the most recent Distribution System Plan, of the Applicant or, if those documents are already on file with the Board, an evidence reference for those documents. If there are any material changes between the proposed capital spending in 2016, and the most recent Distribution System Plan, please provide a detailed explanation/justification of each of those differences.

**2-SEC-4**

[Tab 2, p. 20, 23] Please provide a table showing actuals for each year 2006-2014, and forecast 2015-2020, of the following, each broken down into System Renewal, System

Service, System Access, and General Plant:

- a) Capital spending
- b) Capital Contributions
- c) Capital additions
- d) Depreciation.

**2-SEC-5**

[Tab 2, p. 27, 34] Please confirm that the revenue shortfall arises because the Applicant committed to a greater load growth than actually transpired, in large part due to natural and government-driven conservation that was not forecast by the Applicant.

**2-SEC-6**

[Tab 2, p. 31-32] Please provide a full budget for the costs of the Hurontario LRT work to be done by the Applicant, broken down by year, and also a similar breakdown for the costs to be borne by Hydro One Brampton for the same project.

**2-SEC-7**

[Tab 2, p. 33-36] Please provide references for each past decision by the Board approving either the Churchill Meadows TS or the Cardiff TS.

**2-SEC-8**

[Tab 2, p. 40] Please explain why it is appropriate to recover the incremental capital projects by fixed and variable rate riders. Please provide numerical analysis showing how the proposed rate base additions would be allocated and then recovered if done on a cost of service basis.

**Supplementary ICM Evidence**

**Supp-SEC-9**

[Supplementary Evidence, throughout] For each of the capital projects that are included in the proposed ICM for 2016, please provide a detailed explanation of how, if at all, the Applicant has taken into account, in assessing costs, benefits, timing, and prioritization of the projects, the potential impacts of:

- a) The Distribution Sector Review Panel Report, 2012
- b) The Report of the Premier's Advisory Council on Government Assets, April, 2015 (the Clark Report)
- c) The Board's Report on Ratemaking Associated with Distributor Consolidation, March, 2015
- d) The announcement by the Applicant and three other utilities in April 2015 that they would merge.

Please provide a detailed explanation of the risks to the Applicant and its customers of proceeding with each of the proposed ICM projects at this time. Please ensure that the explanation for each ICM project includes full quantification of those risks, and

describes all mitigation activities the Applicant expects to use to minimize the cost of those risks, in each case as it applies to that particular project.

Submitted by the School Energy Coalition November 25, 2015.

---

Jay Shepherd  
Counsel for School Energy Coalition