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BY EMAIL and RESS

March 14, 2016
Our File No. 20150089

Borden Ladner Gervais
40 King Street West
40th Floor
Toronto, Ontario

Attn: James Sidlofsky

Dear Mr. Sidlofsky:

Re: EB-2015-0089 – Milton Hydro – Materials for Oral Hearing

We are counsel for the School Energy Coalition. This letter is being sent to confirm our previous advice to you some weeks ago that certain materials will be needed for full cross-examination on occupancy costs, and overall OM&A, at the oral hearing in this matter.

We would ask that the following materials be filed with the Board this week, so that we can have them prior to the oral hearing and can ask questions in cross-examination on the contents:

- If any growth factor is being used by the Applicant to assess or support the overall reasonableness of OM&A costs, or any part of OM&A costs (for example, future occupancy costs), the full calculations used by the Applicant to get to that growth factor. Please provide this in live Excel format, if that is how it was calculated.
- A full, side-by-side comparison of all occupancy costs of the Applicant before and after the new building is put into service. This should include all capital costs, all operating costs to hold or maintain the building or any previous properties used for office, warehouse, storage, or other occupancy purposes, depreciation, cost of capital including PILs impacts, property taxes, and any collateral cost changes (such as new furniture or equipment, build-out costs, write-offs of previous assets, asset retirement costs, energy, water, or similar savings, etc. as well as any related PILs impacts) Please include in the comparison, in addition to the individual data items, a calculation of the total revenue

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requirement relating to occupancy for the test year, and for the last prior year without the new building.

- All appraisals of the new building or any part of the new building or its related land.
- All estimates obtained by the Applicant of the cost to build a new building, and any reports or analyses of the advantages and disadvantages of doing so.
- A detailed breakdown of the usage of the new building, including square footage by function, with current floorplans and other backup documents. If the Applicant had a space plan prior to acquiring the new building, or any consultants' reports or other assessments relating to the size or usage of the new building, please include those documents. If there is a forecast of future usage based on growth or other factors, please provide that document or documents as well. For each of the functions in the new building, please provide details of how that occupancy function – e.g. general and executive office space, meeting rooms, warehouse, machine shop, vehicle storage, etc. – was satisfied before moving into the new building, including square footages and similar data.

Thank you for your co-operation.

Yours very truly,
JAY SHEPHERD P. C.

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cc: Wayne McNally, SEC (email)
Interested Parties