

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 under the Ontario Energy Board's own motion to consider potential alternative approaches to recover costs of expanding natural gas service to communities that are not currently served

**INTERROGATORIES TO
EPCOR UTILITIES INC. ("EPCOR")
ON BEHALF OF THE
SCHOOL ENERGY COALITION**

1. [Yachew Report, p.6-7] To achieve the benefits of a competitive franchise process set out in paragraph 17 of his report, what does Dr. Yachew believe are the factors should a municipality consider in selecting a proponent?
2. [Yachew Report, p.12] Notwithstanding achieving any potential policy direction of the Government or Board regarding achieving community expansion, does Dr. Yachew believe that it is economically efficient or preferable to provide any form of subsidization for community expansion projects? If so, please explain.
3. [Yachew Report, p.12] Does Mr. Yachew believe that the "significant benefits of expansion" outweigh the costs of the proposed expansion reserve subsidy? If so, please explain and provide all calculations.
4. [Yachew Report, p.12] If the Board were to approve the 'Expansion Reserve' mechanism discussed in Dr. Yachew's report, would the Board have the jurisdiction to require natural gas consumers of Utilities Kingston and Kitchener Utilities to contribute? If it does not, would it still be appropriate to require some but not all natural gas consumers in the province to contribute?
5. [Yachew Report, Appendix A] Are the responses to the Board's Draft Issues List set out in Appendix A to the Yachew Report, the position of Dr. Yachew, EPCOR, or both?
6. [Parkland Evidence, Dasgupta and Nieberding Report] Please provide Dr. Yachew's view on the conclusions and the analysis contained in the Dasgupta and Nieberding Report.
7. Did EPCOR's successful proposal to the South Bruce municipalities include any proposal for subsidization or a shareholder contributions? If so, please provide details.
8. [South Bruce evidence, Municipalities Report, p.9] Please provide a copy of the responses provided by EPCOR to South Bruce's initial RFI and second phase of the RFI.

9. [Enbridge Evidence, para 14-16] Please provide Dr. Yachew's views with regards to Enbridge's position that more regulated natural gas utilities are not beneficial.
10. [Union Evidence, p.30-35] Please provide Dr. Yachew's views on Union's evidence regarding Issue 9.
11. [Union Evidence, p. 28-30] Please provide EPCOR's view regarding Union's proposed requirements for the Board to issue a Franchise Agreement or Certificate of Public Convenience and Necessity.
12. [EB-2016-0137/138/139, Franchise Agreement, section 5] EPCOR has filed applications for approval of its Franchise Agreements with the Municipalities of Arran-Elderslie, Kinkarden and Huron-Kinloss. In each of those Franchise Agreements, EPCOR has agreed to pay each municipality an annual fee equivalent to 1% of the gross revenue derived by it for natural gas supplied for consumption within the municipality net of the commodity costs of supply. Will EPCOR seek to recover that that annual fee from ratepayers or will that be a shareholder expense?
13. [EB-2016-0137/138/139, Franchise Agreement, section 6] EPCOR's proposed Franchise Agreements with the Municipalities of Arran-Elderslie, Kinkarden and Huron-Kinloss include an ITE for 10 years each. Please explain why EPCOR believes that is the appropriate term length.
14. Please provide any report or analysis conducted by EPCOR regarding potential rates for South Bruce customers.
15. What is EPCOR's estimated PI for the each for its expected natural gas expansion into each of the Municipalities of Arran-Elderslie, Kinkarden and Huron-Kinloss. Please provide all calculations.

Respectfully submitted on behalf of the School Energy Coalition this 8th day of April, 2016

Mark Rubenstein
Counsel for the School Energy Coalition