

**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  
SOUTH BRUCE  
ON BEHALF OF THE  
SCHOOL ENERGY COALITION**

1. [Municipalities Report, p.4] Please provide a copy of the independent analysis of the Union proposal prepared by AMEC/EFT consultants.
2. [Municipalities Report, p.7] Please provide a copy of the RFI package that Municipalities sent to utilities in both Canada and the United States on May 27, 2015.
3. [Municipalities Report, p.9] Please provide a copy of the responses to the initial RFI and second phase of the RFI by the successful proponent EPCOR.
4. [Municipalities Report, p.9] Regarding all those proponents who responded to the RFI, please provide information regarding the various submissions made regarding:
  - a. The role of subsidies
  - b. Customer rates estimates
  - c. System design and costs
5. [Municipalities Report, p.11] Have the Municipalities entered into any other agreement(s) besides a Municipal Franchise Agreement(s) with EPCOR to date. If so, please provide copies.
6. [Todd Report, p.2-3] Mr. Todd discusses that due to the current rate-making methodology, the cost of the distribution infrastructure to serve customers as reflected in the utility's revenue requirement is lower for existing customers than identical new customers. Does Mr. Todd believe there is a methodology to calculate what the appropriate Profitability Index should be to account for this? If so, please provide details.
7. [Bacon Report] Please explain how Mr. Bacon believes that the Rural Rate Assistance methodology can be adapted for community expansion. Please provide a sample calculation.

8. [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. What role did the EPCOR's willingness to pay the annual fee have in their selection as the natural gas proponent for the South Bruce municipalities? Please describe the history and development of the annual fee.

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

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy Coalition