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BY EMAIL and RESS

August 19, 2016
Our File: EB20160058

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2016-0058 – Brantford Power Inc. – 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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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 Brantford Power Inc. under Section 78 of the OEB Act to the Ontario Energy Board for an Order or Orders approving or fixing just and reasonable rates and other service charges for the distribution of electricity as of January 1, 2017.

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

1-SEC-1

[Ex.1-1-2, p.2-3] With respect to the Applicant’s strategic goals, please:

- a. Provide a copy of the latest Strategic Plan.
- b. Explain how the strategic goal to “[g]row the business...” furthers each of the RRFE outcomes.
- c. Please explain what the Applicant means by growing the business by directing capital to industry levels.

1-SEC-2

[Ex.1-1-3, p.4] Please provide a copy of the latest Business Plan.

1-SEC-3

[Ex.1-2-3, p.4] Please provide details about what changes the SLT made after reviewing departmental budgets after “comparing it to the general inflation rate and the customer’s ability to pay”.

1-SEC-4

[Ex.1] Please provide copies of all benchmarking studies, reports, and analysis that the Applicant has undertaken or participated in since 2013, and are not already included in the application.

1-SEC-5

[Ex.1] Please provide a list of measurable outcomes that ratepayers can expect the Applicant to achieve during the Test Year. Please explain how those outcomes are incremental and commensurate with the rate increase the Applicant is seeking in this application.

1-SEC-6

[Ex. 1] Please provide details of all productivity initiatives the Applicant has undertaken since 2013. Please quantify the savings achieved.

1-SEC-7

[Ex. 1] Please provide details of what *incremental* productivity initiatives the Applicant plans to undertake in the Test Year. Please quantify the forecast savings that will be achieved.

1-SEC-8

[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.

1-SEC-9

[Ex.1] Does the Applicant have a corporate scorecard or similar document? If so, please provide the 2015 and 2016 versions.

2-SEC-10

[Ex.2-1] Please provide an update on the forecast in-service date of all 2016 material capital projects.

2-SEC-11

[Ex.2-1-1, p.9] With respect to the proposed new facility:

- a. Please provide any internal business case and all materials provided to the Board of Directors regarding the new facility and potential options.
- b. Please identify and describe each of the 17 properties CBRE, and a rationale for each of the 15 properties that the Applicant chose not to investigate.
- c. Please provide a copy of the AECOM reports and letters which provided advice regarding both, Property A and Property B.
- d. Please provide a copy of the Feasibility Study regarding Property B.
- e. Please provide a status update on the project.
- f. Please provide the basis for AECOM’s budgeted costs for the new facility.
- g. Does the Applicant have a more accurate forecast of the total costs at this time? If so, please provide details, and the basis for it.
- h. Please complete the following table:

	<u>Total (Admin and Operations)</u>	<u>Admin Only</u>
In-Service Year		
Cost Type (Actual or Estimate)		
Total Cost (\$K)		
Total Sq. Ft.		
FTEs (Year In-Service)		
FTEs (Test Year)		

2-SEC-12

[Ex.2-1-1, p.16] Please explain how customers benefit from the purchase of a new building.

2-SEC-13

[Ex.2-5-1, p.1] Please complete Appendix 2-AB by providing internal budgeted amounts for the year in the ‘Plan’ column. Please explain any material variances between plan and actual for each year.

2-SEC-14

[Ex.2-Attach A, p.54-56] For which assets has the ERL% been adjusted due to their observed CHI? Please provide details of the adjustments made to each of those assets.

2-SEC-15

[Ex.2-Attach A, p.54-56] Please complete the table included in Excel file 2-SEC-15 for all asset types and provide the response also in Excel format.

2-SEC-16

[Ex.2] Please add a column appendix 2-AA to the following appendices that show year-to-date actuals for 2016.

4-SEC-17

[Ex.4] Please add a column appendix 2-JC to the following appendices that show year-to-date actuals for 2016.

4-SEC-18

[Ex.4-2-1, p.8] With respect to the Financial Information System project, please:

- a. Provide an update on the status of the project.
- b. Provide the project business case.
- c. Provide a copy of the RFP.
- d. Detail and provide the annual OM&A savings that will be achieved in 2017 and onwards due to the migration to the new Financial Information System.
- e. Provide a breakdown of the Annual support/hosting fees.

4-SEC-19

[Ex.4-2-1, p.10] Please provide a copy of the System Integration Study.

4-SEC-20

[Ex.4-2-1, p.10] With respect to the Customer Information System Project, please:

- a. Provide an update on the status of the project.
- b. Provide the project business case.
- c. Provide a copy of the RFP.
- d. Detail and provide the annual OM&A savings that will be achieved in 2017 and onwards due to the migration to the new Financial Information System.
- e. Provide a breakdown of the Annual support/hosting fees.

4-SEC-21

[Ex.4-2-2, p.2] For each new position created since 2014, please provide a full job description and justification for why the position is required.

4-SEC-22

[Ex.4-4-2 p.7] Is the Applicant recovering any of the costs for its Vice-President Customer Service and Conservation from amounts available from the IESO for CDM activities? If so, please provide details.

4-SEC-23

[Ex4-5-1, p.9] Please explain why there is not a decrease in the Applicant's OM&A as a result of a reduction in services to be provided to BPI in 2017 as a result the City of Brantford forecasted sale of that asset.

5-SEC-24

[Ex.5] Please provide the Applicant's regulated ROE for each year since 2013.

5-SEC-25

[Ex.5-Attach. 5A] Please provide a copy of the previous Promissory Note with the City of Brantford.

5-SEC-26

[Ex.5-Attach. 5A] Before renewing the Promissory Note with the City of Brantford, did the Applicant look at replacing that debt from a third-party provider? If so, please explain why it chose not to.

9-SEC-27

[Ex.9-1-1, p.3-5] Please explain what type of expenses the Applicant believe it may be required to incur as a result of Ontario's Cap and Trade program.

Respectfully submitted on behalf of the School Energy Coalition this August 19th, 2016.

Original signed by

Mark Rubenstein
Counsel for the School Energy
Coalition