



**BY EMAIL and RESS**

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Ontario Energy Board  
2300 Yonge Street  
27th Floor  
Toronto, Ontario  
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February 5, 2017  
Our File: EB20170045

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2017-0045 – Halton Hills Hydro Inc. 2018 IRM – SEC Interrogatories**

We are counsel to the School Energy Coalition (“SEC”). Pursuant to Procedural Order No.1, please find SEC’s interrogatories.

Yours very truly,  
**Shepherd Rubenstein P.C.**

*Original signed by*

Mark Rubenstein

cc: Wayne McNally, SEC (by email)  
Interested parties (by email)

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Schedule B, as amended;

**AND IN THE MATTER OF** an application by Halton Hills Hydro Inc. to the Ontario Energy Board for an Order or Orders approving or fixing just and reasonable rates and other charges for electricity distribution to be effective May 1, 2018.

**INTERROGATORIES**

**ON BEHALF OF THE**

**SCHOOL ENERGY COALITION**

**Depreciation**

**SEC-1**

Please explain on what regulatory basis (e.g. z-factor) the Applicant is seeking approval to establish a new deferral and variance account for the purpose of recovering amounts related to its depreciation expense, and how the request meets the applicable regulatory criteria.

**SEC-2**

[p.1] Please confirm that the error was made by the Applicant or those working for it (e.g. auditors, regulatory consultants, etc.) and was entirely within its control.

**SEC-3**

[p.1] Please confirm that the Applicant's last cost of service application (EB-2015-0074) was resolved by way of an approved Settlement Proposal with intervenors on all issues.

**SEC-4**

Please provide the Applicant's 2016 and 2017 regulatory ROE, including the full calculations as would be provided to the Board in its RRR filings. Please provide a similar calculation regarding its forecast ROE for 2018 if this request for a deferral and variance account is not approved.

**Z-Factor**

**SEC-5**

[p.4] Please provide a copy of the referenced October 2014 Government of Ontario issued mandate.

**SEC-6**

[p.4] Please provide a copy of the originating processes for the settlement and arbitration process (i.e. notice of arbitration, grievance, etc.).

**SEC-7**

[p.5] Please provide a copy of the Agreement.

**SEC-8**

[p.5] Please provide references to the EB-2015-0074 record where the Applicant referenced the outstanding/on-going pay equity process.

**SEC-9**

[p.8] Please confirm that Agreement was reached as a remedy to the Applicant not meeting its obligations under the *Pay Equity Act*.

**SEC-10**

[p.9] Please explain why it is appropriate for the Board to approve the following:

- a. Forecast costs in 2018
- b. Forecast costs in future rate years (2019-2021)
- c. Disposition of those costs for future rate years

**SEC-11**

[p.9] With respect to Table PE1:

- a. Is the table intended to reflect amounts incurred or forecast to be incurred for the given years? If not, please explain what the table is intended to demonstrate, and provide a separate table showing, for each year between 2012 and 2021, the amount actually to be incurred by the Applicant.
- b. Please breakdown the 2012-2014 year into each individual year.
- c. Please confirm that the costs would be classified as an OM&A cost.
- d. Which individual years has the Applicant incurred or forecast to incur these incremental costs above its materiality threshold of \$50,000?

Respectfully submitted on behalf of the School Energy Coalition this February 5<sup>th</sup>, 2018.

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy  
Coalition