



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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October 11, 2018
Our File: EB20180028

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2018-0028 – Energy+ Inc. – SEC Interrogatories

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

Yours very truly,
Shepherd Rubenstein P.C.

Original signed by

Mark Rubenstein

cc: Wayne McNally, SEC (by email)
Applicant, TMMC, and interested parties (by email)

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 to the Ontario Energy Board by Energy+ Inc. pursuant to Section 78 of the *Ontario Energy Board Act* for approval of its proposed distribution rates and other charges, effective January 1, 2019.

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

SEC-TMMC-1

[Pollock Evidence, p.48-51] With respect to Mr. Pollock’s proposed standby rate design:

- a. Is Mr. Pollock aware of any other regulators who have considered a similar approach to standby rate design? If so, please provide details including copies of any regulatory decisions.
- b. Has Mr. Pollock ever recommended a similar standby rate design in evidence to a regulator? If so, please provide copies of that evidence and copies of the resulting regulatory decision.

SEC-TMMC-2

[Pollock Evidence, p.53] Mr. Pollock states that his “recommended standby rate closely parallels the rate design approved by several state regulatory commissions in the United States.” Please provide copies of regulatory decisions and or policies approving or discussing the referenced rate design.

SEC-TMMC-3

[Pollock Evidence, p.51-55] SEC seeks to understand how the Board would approve the proposed standby rate design on a generic basis for other Energy+ customers with LDG.

- a. Please provide the proposed wording that Mr. Pollock and/or TMMC believes would have to be included in Energy+ tariff.
- b. Please provide a step-by-step explanation of how Energy+ would determine the applicable maximum volumetric rate and daily volumetric rate.
- c. Does Mr. Pollock believe there should be a minimum size of a customer’s LDG facility or facilities before they should be required to pay a standby rate? If so, please explain.

- d. [Exhibit 8, p.13] Energy+ has proposed that its proposed standby rate proposal be applied not just to the large user class but also to the GS> 50-999 kW and GS 1,000-4,999 kW classes. Does Mr. Pollock believe that this is appropriate or that there should be a minimum size of the class that should be charged the standby rate? If so, please explain.
- e. If the answer to part (d) is yes, in full or in part, does Mr. Pollock propose any adjustments to his proposed methodology in determining the standby rate for customers in other rate classes.

Respectfully submitted on behalf of the School Energy Coalition, this October 11th, 2018.

Original signed by

Mark Rubenstein
Counsel for the School Energy Coalition