

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an Application by Toronto Hydro-Electric System Limited (“Toronto Hydro”) for an Order or Orders approving or fixing just and reasonable distribution rates and other charges, effective January 1, 2020 to December 31, 2024.

**INTERROGATORIES ON BEHALF
OF THE
SCHOOL ENERGY COALITION**

U-SEC-98

[Ex. U-1B-1, p.14, Table 2] With respect to Table 2:

- a. Please confirm that under the 2018 column, it should read ‘Unit Costs (2018)’ and not ‘Unit Costs (2017)’.
- b. Please provide the table in excel format.

U-SEC-99

[U-1C-5, p.62; 1B-SEC-8, Table 5] Similar to what is provided in the 2018 Toronto AIF, please provide the weightings for the 2019 corporate scorecard.

U-SEC-100

[JTC2.18] Toronto Hydro notes that there were errors made to the box construction poles forecast in interrogatory responses 2B-AMPCO-24(a), 2B-SEC-51, and 2B-VECC-15. Please a) update the interrogatories as applicable for 2018 actuals, b) make the noted corrections.

U-SEC-101

[2B-SEC-52] Please update the interrogatory response to include 2018 actuals.

U-SEC-102

[JTC3.6, Appendix A] Please update the interrogatory response to include 2018 actuals. (Please also provide include in your response the table in excel format)

U-SEC-103

[8-SEC-94] Please update the interrogatory response. (Please also provide include in your response the table in excel format)

U-SEC-104

[Evidence Overview Presentation, p.6] Please provide the underlying data tables used in the total capital and OM&A expenditure graphs. Please ensure the tables have both the unadjusted amounts and the OEB inflation numbers used for the purposes of the adjustment.

U-SEC-105

[Evidence Overview Presentation, p.15] With respect to reliability:

- a. Please expand the SAIFI chart to include (a) 2018 data, and b) forecast 2019 to 2022 SAIFI levels.
- b. Please provide a similar chart as requested in part (a) for SAIDI.
- c. Please provide a table showing numerical values for the charts requested in parts (a) and (b).

Respectfully submitted on behalf of the School Energy Coalition this May 21, 2019.

U-SEC-106

[Update - Schedules] Please file, in Excel format, the OEB PILs model and the Revenue Requirement Work Forms for 2020 to 2024, adjusted for the impacts of Bill C-97, the federal government bill to implement the 2018 Fall Economic Statement and the 2019 Budget.

U-SEC-107

[Update - Schedules] Based on the results of U-SEC-106, and assuming the changes meet the materiality threshold, please file updated versions of the following (in Excel format where applicable):

- a. Cost allocation model.
- b. Appendix 2-N, Shared Services
- c. Appendix 2-OB, Capital and Debt
- d. Appendix 2-W, Bill Impacts
- e. The evidence of PSE, including the supplementary report, or a statement that the PSE evidence is not affected by the tax changes
- f. To the extent, if any, that the tax changes will result in changes to capital expenditures, or changes to the amount of contributions to be received by the Applicant, Appendices 2-AA and 2-AB, Capital Expenditures, Appendix 2-BA, Fixed Asset Continuity Schedule, and Appendix 2-C, Depreciation and Amortization Expense, for all relevant years.
- g. Any other evidence of the Applicant, whether original, updated, or in response to interrogatories, that, if not updated to reflect the tax changes, would be misleading or confusing for the Board.

Mark Rubenstein
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