

**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 Kitchener-Wilmot Hydro Inc. for an Order or Orders pursuant to section 78 of the Ontario Energy Board Act, 1998 for January 1, 2020 distribution rates and related matters.

**INTERROGATORIES**

**FROM THE**

**SCHOOL ENERGY COALITION**

1. [Ex. 1, p. 8] Please provide the main agreements and constating or other governance documents for GridSmartCity Cooperative.
2. [Ex. 1, p. 9] Please provide, for each of the last ten years of actuals, the Total Spend of the Applicant broken down between operating costs and capital costs, and for each year the number of customers and the Total Spend per customer.
3. [Ex. 1, p. 10] For each of the positions that were primarily funded by CDM programs, please describe what has happened to the position, how it is currently funded, and the full impact of the change on regulated revenue requirement.
4. [Ex. 1, p. 11] Please provide a breakdown of the full revenue requirement in the test year associated with owning and operating the eight transformer stations.
5. [Ex. 1, p. 15] Please provide the numerical data behind Table 1.1.3.3-1.
6. [Ex. 1, p. 36] Please advise which entity employs each of the four senior executives, and describe in detail the allocation of their salaries and other costs between the affiliated companies.
7. [Ex. 1, p. 36] Please provide the full final report on the corporate governance project or, if there was no final report, the reports, memoranda, presentations or other documents that set out the results of the project.
8. [Ex. 1, p. 37] Please file a copy of the Shareholders Agreement including any amendments.
9. [Ex. 1, p. 38] Please file the most recent long-range strategic plan of KPC.
10. [Ex. 1, p. 61] Please add a row to Table 1.4.5-3 that shows the total amount of capitalized employee costs in each year.
11. [Ex. 1, p. 72] Please provide any internal reports or analyses showing the reductions in operating costs associated with the online forms initiative.

12. [Ex. 1, p. 93] Please provide the most recent two packages sent to the Board of Directors, including the vice-presidents' reports and any reports by the CEO or any others.
13. [Ex. 1, p. 104] Please add a row to Table 1.7.4-1 showing the achieved ROE (calculated on a regulatory basis) for each year.
14. [Appendix 1-1] Please provide the report identified as GSC 2017/2018 Report.
15. [Ex. 4, p. 9] Please explain how the large increase in Totex from 2018 to 2019 and 2020 is consistent with the Total Spend approach.
16. [Ex. 4, p. 21] Please explain the up and down pattern of admin credits annually from 2014 to 2020.
17. [Ex. 4, p. 25] Please provide a detailed breakdown of the incremental costs, and the cost savings, associated with the new HR/Payroll system. If the purposes of the new system is not to generate cost savings, please provide details of the additional functionality or other benefits – other than cost savings – that justify the incremental spending.
18. [Ex. 4, p. 27] What happened to the additional administration credits arising out of the LRT project?
19. [Ex. 4, p. 29] Please provide the presentation to the Board of Directors, and the approval resolution, for the CIS approval in May 2019.
20. [Ex. 4, p. 31] Please provide a breakdown of all annual cost savings expected to arise as a result of the new CIS, and a detailed calculation of the annual \$910,000 revenue requirement. Please recalculate the revenue requirement using the new income tax rules in Bill C-97.
21. [Ex. 4, p. 33] Please provide all of the monthly financial statements and operating variance analysis reports for 2014.
22. [Ex. 4, p. 44] Please provide the study, report or other analysis that resulted in the change in wood pole testing.
23. [Ex. 4, p. 67] Please advise how roles have been reassessed from 2014 to date, and how many the Applicant has determined are no longer required.
24. [Ex. 4, p. 95] Please recalculate Table 4.10.2.1-4 applying the rules in Bill C-97.
25. [Ex. 4, p. 96] Please calculate the impact on revenue requirement of using the smoothed CCA of \$1,300,162 for the CIS as opposed to the expected actual 2020 CCA of \$1,842,500.

Respectfully submitted on behalf of the School Energy Coalition this July 10, 2019.

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Jay Shepherd  
Counsel for the School Energy Coalition