



**BY EMAIL and RESS**

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Ontario Energy Board  
2300 Yonge Street  
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July 12, 2019  
Our File: EB20190032

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2019-0032 – ENWIN 2020 – SEC Interrogatories**

We are counsel to the School Energy Coalition ("SEC"). Pursuant to Procedural Order No.1, enclosed please find SEC's interrogatories.

**Shepherd Rubenstein P.C.**

*Original signed by*

Mark Rubenstein

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

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*,  
S.O. 1998, c.15 (Sched.B);

**AND IN THE MATTER OF** an application by ENWIN  
Utilities Ltd. for an Order or Orders pursuant to section 78 of the  
*Ontario Energy Board Act, 1998* for approval of its proposed  
distribution rates and other charges, effective for January 1,  
2020.

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

**1-SEC-1**

[Ex.1] Please provide all material provided to the Applicant's Board of Directors regarding its approval of this application and the underlying budgets.

**1-SEC-2**

[Ex.1] Please provide copies of all benchmarking studies, reports, and analysis that the Applicant has undertaken or participated in since its last rebasing application in 2009, that are not already included in the application.

**1-SEC-3**

[Ex.1] Please provide a step-by-step explanation of the Applicant's budgeting process.

**1-SEC-4**

[Ex.1] Please provide details of all productivity and efficiency measures the Applicant has taken since its last rebasing application in 2009.

**1-SEC-5**

[Ex.1] Please provide details of all productivity and efficiency measures the Applicant plans to take in the test year. Please quantify the forecast savings.

**1-SEC-6**

[Ex.1] Please provide a copy of the Applicant's 2009 to 2019 corporate scorecards.

**1-SEC-7**

[Ex.1] SEC understands that since its last rebasing application Windsor city council has ordered a number of audits to be conducted of the Applicant. Please provide a copy of those audits, as well as an update on the implementation of any findings contained within.

**2-SEC-8**

[Ex.2] Please provide add a column to appendix 2-AA to show 2019 year-to-date actuals.

**2-SEC-9**

[Ex.2] Please provide a table that shows all material capital projects undertaken by the Applicant since 2009, that shows i) the original budget for the project, ii) the final budget for the project, iii) explanation of any variance +/- 5%.

**2-SEC-10**

[Ex.2, p.42] Please explain the basis for the 'plan' amount in each year.

**2-SEC-11**

[Ex.2, p.41] Please explain the drivers of the significant increase in annual; actual/forecast annual spending between 2013-2018 and 2019-2024.

**2-SEC-12**

[Ex.2, Attach 2-A] For each material capital project in 2019 and 2020, please provide the estimated in-service date.

**[2-SEC-13**

[Ex.2, Attach 2-A] Please provide a detailed chronology of the capital planning process that led to the capital plan contained in this application.

**2-SEC-14**

[Ex.2, Attach 2-A] Please explain how planning process set out in this application has changed since its last application before the Board for 2009 rates.

**2-SEC-15**

[Ex.2, Attachment 2-A] For each of the Applicant's major asset/asset categories, please provide a table that shows for each and for each year since 2009 to 2025: a) the number of assets replaced/forecast to be replaced, b) the cost/forecast cost to replace.

**2-SEC-16**

[Ex.2, Attach 2-A, p.56] Please provide a table that shows the Applicant's SAIDI and SAIFI for each year since 2009 excluding loss of supply and major event days.

**2-SEC-17**

[Ex.2, Attach 2-A, p.64] Please revise table 18 and 19 to include information from 2009 to 2012.

## **2-SEC-18**

[Ex.2, Attach 2-A, p.110] Before Kinetrics undertook an ACA in 2017, has the Applicant had a ACA or similar analysis of the condition of its assets. If so, please provide a copy of previous versions of the ACA or similar analysis since 2009.

## **2-SEC-19**

[Ex.2, Attach 2-A, p.183] The evidence states: “Since price is of critical importance to its customers, ENWIN has responded by pacing and deferring investments. In some cases, projects that were originally intended to be completed in the DSP were not pursued due to the cost of the project and the benefit.” Please provide full details of the changes made the capital plan after the Applicant undertook its customer engagement activities. Please quantify the impact to the test year budget of the changes made.

## **2-SEC-20**

[Ex.2, Attach 2-A, p.213-14] With respect to the risk matrix and benefits matrix:

- a. Within each value, which have a weighting, there are in some instances multiple categories, how does the Applicant weigh the categories within a value?
- b. How does the Applicant determine customer costs?
- c. Is there a more detailed guide used internally? If so, please provide a copy.
- d. Please explain how the likelihood of failure is determined.

## **2-SEC-21**

[Ex.2, Attachment 2-A, p.213-2015, 311]. With respect to the PROSORT tool:

- a. How long has the Applicant been using this tool?
- b. Since the Applicant begun to use the tool, for each year the Applicant has run the tool to prioritize projects, please provide a list of projects and the summary information (i.e. change of risk score, and CRPF).
- c. For all 2019 and 2020 projects, please provide the full project information similar to provide in Table 76
- d. How does the tool, if at all, ensure that projects that have a low overall risk, but low cost per unit of risk, are excluded from the prioritization?

## **2-SEC-22**

[Ex.2, Attachment 2-A, Appendix C, p.11] With respect to the Facilities Business Plan:

- a. Who owned and had legal responsibility over the Ouellette Facility, the Applicant or the Water Utility Commission?
- b. If the answer to part (a) is the Applicant, please explain why any portion of the gains on sale should be allocated to the Water Utility Commission.
- c. Please explain why the Applicant is proposing to share the gains on sale 50-50 between shareholder and ratepayer.

- d. The evidence is not sufficiently on what the specific renovations are to be undertaken to the 4545 Rhodes Drive. Please provide further details and detailed budget.

### **3-SEC-23**

[Ex.3] Please provide a revised version of Appendix 2-H with 2019 year-to-date actuals.

### **4-SEC-24**

[Ex.4, p.8, Table 6-2] Please provide the underlying spreadsheet (with formulas intact) used to create Table 4-2.

### **4-SEC-25**

[Ex.4] Please add a column to Appendix 2-JC for 2019 year to date actuals.

### **4-SEC-26**

[Ex.4, p.18, Table 4-9] Please explain why 'IFRS Change in Burden Rates – Rate' is a cost driver in any year after 2012, the year the Applicant adopted IFRS.

### **4-SEC-27**

[Ex.4, p.35] The evidence states that the current collective agreement with the 'Hydro' bargaining unit ended on March 31, 2019. Please provide an update on the status of negotiations.

### **4-SEC-28**

[Ex.4, p.43] Please revise Appendix 2-K to include the following:

- a. Breakout of non-management into union and non-union FTEs;
- b. Add a row to show the total amount of compensation costs in each year that are capitalized.

### **4-SEC-29**

[Ex.4, p.66] Are the 2020 regulatory rebasing costs that are to be recovered commencing in 2020, also included in the historical/bridge OM&A costs in Appendix 2-JA, 2-JB, and 2-JC.

### **4-SEC-30**

[Ex.4, p.50] With respect to the relationship between the Applicant and its affiliates:

- a. Please complete a version of the attached excel table for each of 2017, 2018, 2019 and 2020.
- b. [Ex.4, Appendix K-O] Please detail all changes made to current shared services agreement with each of the Applicant's affiliates since 2009.

### **4-SEC-31**

[Ex.4, p.62] Please revise 2020 PILS amount for the impact of Bill C-97. Please detail all changes made.

### **5-SEC-32**

[Ex.5] For each year between 2009 and 2019, please provide the Applicant's actual or forecast ROE and the Board's ROE parameter for that year.

**7-SEC-33**

[Ex.7, p.8] The Applicant proposes to eliminate two of its rate classes. Please provide a table showing the impacts in to all classes in a scenario where the Board does not approve eliminate of the two classes.

**9-SEC-34**

[Ex.9, 15] With respect to account 1508 – Other, the Productivity Initiatives Deferral Account established in the EB-2008-0227 proceeding.

- a. Please provide a full breakdown of the \$977,507 incurred.
- b. For each external expert retained:
  - i. Please provide a copy of their retainer, terms of reference, work plan, or similar document.
  - ii. Please provide a copy of their final work product.
  - iii. Please explain how the Applicant implemented their advice and/or recommendations.
  - iv. Please provide the savings achieved as a result of the implementation of their advice and/or recommendation and a breakdown of how those savings are calculated.
- c. Please explain how, if at all, the Applicant facilitated stakeholder involvement.

**9-SEC-35**

[Ex. 9, p.17] With respect to account 1534 and 1535:

- a. Please provide a full breakdown of the costs contained in Account 1534.
- b. Please provide a full breakdown of costs contained in Account 1535.

Respectfully submitted on behalf of the School Energy Coalition this July 12, 2019.

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy Coalition