Shepherd Rubenstein

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BY EMAIL and RESS

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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September 23, 2019
Our File: EB20190180

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2019-0180 – Energy+ Motion to Review – SEC Interrogatories

We are counsel to the School Energy Coalition ("SEC"). Pursuant to Procedural Order No. 2, please find interrogatories on behalf of SEC.

Yours very truly,
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 subsection 25(1) of the *Electricity Act, 1998*;

AND IN THE MATTER OF a Motion to Review and Vary the Board's Decision and Order dated June 13, 2019 in respect of an Application by Energy+ Inc. under Section 78 of the Act for an order approving just and reasonable rates and other charges for electricity distribution to be effective January 1, 2019 (Board File No. EB-2018-0028).

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

1. Please confirm that all else being equal, a retrofit/renovation of an existing building are less costly than a new build.

2. [SEC-TCQ-5] In Energy+'s evidence it provided its own benchmarking evidence to support its proposed new facility.

    a. Please confirm that Energy+'s own benchmarking evidence did not include any adjustments for comparator facilities.
    b. Please provide a revised table showing a similar cost per square foot which includes a Building Construction Price Index adjustment for each of the comparators. Please provide an explanation of all underlying calculations.

3. Please confirm that the expert was not asked and has not provided an opinion on the on appropriateness of Energy+ selecting the Southworks facility as its dedicated administration office.

Respectfully submitted on behalf of the School Energy Coalition this September 23rd, 2019.

Original signed by

Mark Rubenstein
Counsel for the School Energy