



**BY EMAIL and RESS**

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Ontario Energy Board  
2300 Yonge Street  
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Toronto, Ontario  
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December 20, 2019  
Our File: EB20190023

**Attn: Christine Long, Registrar & Board Secretary**

Dear Ms. Long:

**Re: EB-2019-0023 – Burlington Hydro Inc. ICM – SEC Interrogatories**

We are counsel to the School Energy Coalition ("SEC"). Attached, please find a copy of SEC's interrogatories.

Yours very truly,  
**Shepherd Rubenstein P.C.**

*Original signed by*

Mark Rubenstein

cc: Wayne McNally, SEC (by email)  
Applicants and intervenors (by email)

**ONTARIO ENERGY BOARD**

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

**AND IN THE MATTER OF** an Application by Burlington Hydro Inc. to the Ontario Energy Board for an Order or Orders approving or fixing just and reasonable rates and other service charges for the distribution of electricity as of May 1, 2020.

**INTERROGATORIES**

**ON BEHALF OF THE**

**SCHOOL ENERGY COALITION**

**SEC-1**

[p.46] Please show where the Applicant informed the Board that it would be filing an application for an ICM when it requested approval to defer rebasing for 2020 rates.

**SEC-2**

[p.46] Please explain why the two ICM projects are required to be completed in 2020 and cannot wait until the Applicant's rebasing application.

**SEC-3**

[p.45-46] Please provide and explain what the Applicant believes is its project-specific materiality threshold.

**SEC-4**

[Appendix I] With respect to the Customer Information System Replacement program:

- a. Please provide an update on the status of the project.
- b. Please provide a detailed project schedule.
- c. Please explain the basis of the project cost estimate.
- d. Please explain how the project vendor was selected.
- e. Please provide any internal project business case or similar document for the for the project.
- f. The Applicant states "BHI's customers have expressed their dissatisfaction and frustration with its current system and have been asking for more functionality for many years." Please provide further details regarding customer dissatisfaction, and how the new CIS will address these issues.

- g. Please detail and quantify the savings customers can expect because of the new CIS.

**SEC-5**

[Appendix II] With respect to the Geographic Information System Replacement program:

- a. Please provide an update on the status of the project.
- b. Please provide a detailed project schedule.
- c. Please explain the basis of the project cost estimate.
- d. Please explain how the project vendor was selected.
- e. Please provide any internal project business case or similar document for the for the project.
- f. Please detail and quantify the savings customers can expect because of the new GIS savings.

Respectfully submitted on behalf of the School Energy Coalition, this December 20, 2019.

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy Coalition