



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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October 1, 2020
Our File: EB20200008

Attn: Christine Long, Registrar & Board Secretary

Dear Ms. Long:

Re: EB-2020-0008 – Canadian Niagara Power Inc. Z-Factor – SEC Interrogatories

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

Yours very truly,
Shepherd Rubenstein P.C.

Mark Rubenstein

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

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an Application by Canadian
Niagara Power Inc. for an Order or Orders pursuant to Section
78 of the *Ontario Energy Board Act, 1998* approving or fixing
just and reasonable rates and other service charges for the
distribution of electricity.

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

SEC-1

[Ex.1, p.21] Please provide a breakdown of the Z-Factor claim associated with each of CNPI's internal labour (i.e. overtime costs) and third-party costs.

SEC-2

[Ex.1, p.20] Please provide the 2019 year-end total OM&A broken down by each of the major categories (i.e. operations, maintenance etc).

SEC-3

[Ex.1, p.22] The Applicant states: "Due to the infrequent and extreme nature of such events, CNPI has not planned or budgeted for such events, and as such, the costs of this extreme and unusual event are incremental to the costs underpinning CNPI's most recent cost of service application in 2017." Did the Applicant include in its most recent cost of service application a budgeted OM&A amount related to *any* storm restoration or other unanticipated operations and maintenance costs? If so, please provide that amount and the corresponding 2019 actuals. If not, please explain how storm restoration and operations and maintenance costs are normally considered in the Applicant's budgeting process.

SEC-4

Please provide the Applicant's 2019 regulated ROE. Please provide a copy of the supporting calculations.

Respectfully submitted on behalf of the School Energy Coalition this October 1, 2020.

Mark Rubenstein
Counsel for the School Energy Coalition