



**BY EMAIL and RESS**

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Ontario Energy Board  
2300 Yonge Street  
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Toronto, Ontario  
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October 19, 2020  
Our File: EB20200030

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

Dear Ms. Long:

**Re: EB-2020-0030 – Hydro One Dx 2021 – 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*, S.O. 1998, c. 15, (Schedule B);

**AND IN THE MATTER OF** an Application by Hydro One Networks Inc. for an Order or Orders approving just and reasonable rates and other charges for electricity distribution to be effective January 1, 2021.

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

**SEC-1**

[p.17] For each of 2018 and 2019, please provide a table that shows the inputs to the ROE calculation used for the purpose of the ESM calculation, as compared to the amounts approved in EB-2017-0049. Please provide an explanation for all variances.

**SEC-2**

[p.17] Please provide a copy of the RRR 2.1.5.6 filings for each of 2018 and 2019 years. Please reconcile the filings with the detailed ESM calculations provided in response to SEC-1 and 4.0-Staff-17(a).

**SEC-3**

[p.17] If the Board orders interim disposition of the ESM amounts for 2018 and 2019 as suggested by interrogatory 4.0-Staff-17, please explain what could cause the amount to change between the interim order and its next rebasing application when disposition on a final basis would be sought.

**SEC-4**

[p.17] Please provide a copy of the referenced Distribution Productivity Report.

**SEC-5**

[p.9] Please provide a table that shows the elements of the revenue requirement calculation approved in the EB-2017-0049 that is used to derive the fixed elements of the Capital Factor during the Custom IR term (i.e. a final version of Table 2 provided in EB-2017-0049, Draft Rate Order, p.11).

**SEC-6**

[p.9] Please provide the incremental reduction in the revenue requirement in 2021 (over the 2020 amount), as a result of the application of the stretch factor for: a) OM&A, and b) capital-related revenue requirement.

Respectfully submitted on behalf of the School Energy Coalition this October 19, 2020.

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Mark Rubenstein  
Counsel for the School Energy Coalition