

**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 North Bay Hydro Distribution Limited (“NBHDL”) for an Order or Orders approving or fixing just and reasonable rates and other service charges for the distribution of electricity, effective May 1, 2021.

**SECOND ROUND INTERROGATORIES**

**FROM THE**

**SCHOOL ENERGY COALITION**

*[All interrogatories reference the spreadsheet filed May 28, 2021]*

1. Please provide the conclusions that the Applicant believes the OEB and the parties should draw from the spreadsheet provided.
2. Please explain how the OEB and parties should adjust, if at all, the data for the comparators to reflect the fact that they come from different years.
3. With respect to the selection of the comparator group:
  - a. Please explain the criteria used to determine which utilities would be included in, and excluded from, the comparator group.
  - b. Please specifically explain why Greater Sudbury, although much larger than the Applicant was included.
  - c. Please specifically explain why Kingston Hydro, although a similar size to the Applicant, was excluded.
4. With respect to the results for the comparator group selected by the Applicant, please confirm:
  - a. Only Halton Hills and Sudbury have higher Management compensation per Management FTE than that proposed by the Applicant.
  - b. The Management compensation proposed by the Applicant is 8.64% higher per FTE than the average of the Applicant’s comparator group, and that translates into a variance from average of \$166,244 per year.

- c. Only Halton Hills has higher Management compensation per customer than that proposed by the Applicant.
  - d. The Management compensation proposed by the Applicant is 25.94% higher per customer than the average of the Applicant's comparator group, and that translates into a variance from average of \$430,045.
- 5. Attached to these interrogatories is a spreadsheet listing the OM&A, O&M, and G&A of each distributor from the 2019 OEB Yearbook. With respect to this data:
  - a. Please confirm that the Applicant accepts the accuracy of the data and the calculations.
  - b. Please confirm that the column GRP correctly identifies the LDCs included in the Applicant's comparator group.
  - c. Please confirm that, excluding Toronto Hydro and Hydro One, the Applicant already had both O&M and G&A per customer higher than the industry average in 2019, before the increases proposed in this Application.

Submitted on behalf of the School Energy Coalition this June 4, 2021.

Jay Shepherd  
Counsel for the School Energy Coalition

## Comparison of 2019 OM&A Values

Distributor	OM&A/Cust.	O&M/Cust	G&A/Cust	# of Customers	Grp.
1 Hydro One Networks Inc.	\$419.58	\$265.06	\$154.51	1,343,959	
2 Alectra Utilities Corporation	\$253.93	\$111.21	\$142.71	1,054,613	
3 Toronto Hydro-Electric System Limited	\$344.50	\$144.01	\$200.49	777,904	
4 Hydro Ottawa Limited	\$254.69	\$84.05	\$170.65	339,771	
5 Elexicon Energy Inc.	\$187.19	\$72.24	\$114.95	167,653	
6 London Hydro Inc.	\$250.00	\$119.21	\$130.78	160,598	
7 Kitchener-Wilmot Hydro Inc.	\$202.23	\$119.88	\$82.35	97,695	
8 ENWIN Utilities Ltd.	\$292.94	\$107.25	\$185.69	89,561	
9 Oakville Hydro Electricity Distribution Inc.	\$256.42	\$118.78	\$137.64	73,133	
10 Burlington Hydro Inc.	\$288.18	\$141.24	\$146.93	68,205	
11 Energy+ Inc.	\$281.45	\$92.77	\$188.68	66,521	
12 Entegrus Powerlines Inc.	\$237.59	\$72.57	\$165.02	59,810	
13 Oshawa PUC Networks Inc.	\$220.36	\$50.94	\$169.42	59,183	
14 Waterloo North Hydro Inc.	\$258.57	\$134.24	\$124.33	57,855	
15 Synergy North Corporation	\$302.64	\$156.68	\$145.96	56,700	
16 Niagara Peninsula Energy Inc.	\$340.98	\$136.70	\$204.28	56,067	
17 Greater Sudbury Hydro Inc.	\$330.68	\$170.16	\$160.51	47,725	**
18 Newmarket-Tay Power Distribution Ltd.	\$294.57	\$102.10	\$192.47	43,931	
19 Milton Hydro Distribution Inc.	\$249.63	\$98.38	\$151.25	40,388	
20 Brantford Power Inc.	\$278.30	\$89.57	\$188.73	40,124	
21 Peterborough Distribution Incorporated	\$235.32	\$85.32	\$150.00	37,250	**
22 Bluewater Power Distribution Corporation	\$371.34	\$112.89	\$258.45	36,743	**
23 PUC Distribution Inc.	\$340.90	\$187.30	\$153.59	33,647	**
24 Essex Powerlines Corporation	\$243.16	\$86.76	\$156.40	30,393	**
25 Canadian Niagara Power Inc.	\$347.75	\$135.12	\$212.63	29,455	**
26 Kingston Hydro Corporation	\$259.62	\$124.88	\$134.74	27,778	
27 North Bay Hydro Distribution Limited	\$281.43	\$113.85	\$167.58	24,199	**
28 Westario Power Inc.	\$250.64	\$89.81	\$160.83	23,774	**
29 Welland Hydro-Electric System Corp.	\$293.74	\$152.17	\$141.57	23,664	**
30 EARTH Power Corporation	\$315.50	\$97.32	\$218.18	23,380	**
31 Halton Hills Hydro Inc.	\$284.79	\$69.69	\$215.11	22,528	**
32 Festival Hydro Inc.	\$285.95	\$112.60	\$173.35	21,382	**
33 Innpower Corporation	\$312.27	\$105.54	\$206.72	18,632	
34 EPCOR Electricity Distribution Ontario Inc.	\$366.13	\$126.06	\$240.07	17,916	
35 Orillia Power Distribution Corporation	\$352.91	\$153.07	\$199.84	14,366	
36 Wasaga Distribution Inc.	\$249.97	\$63.82	\$186.14	14,003	
37 Lakeland Power Distribution Ltd.	\$351.32	\$124.30	\$227.02	13,762	
38 Orangeville Hydro Limited	\$275.36	\$75.80	\$199.56	12,652	
39 E.L.K. Energy Inc.	\$231.66	\$87.02	\$144.64	12,478	
40 Algoma Power Inc.	\$1,047.24	\$564.65	\$482.59	11,732	
41 Grimsby Power Incorporated	\$276.58	\$126.55	\$150.04	11,631	
42 Ottawa River Power Corporation	\$296.83	\$102.38	\$194.46	11,320	
43 Lakefront Utilities Inc.	\$254.29	\$93.46	\$160.83	10,546	
44 Niagara-on-the-Lake Hydro Inc.	\$300.81	\$119.77	\$181.04	9,558	
45 Centre Wellington Hydro Ltd.	\$362.98	\$118.92	\$244.06	7,156	
46 Tillsonburg Hydro Inc.	\$403.02	\$119.92	\$283.10	7,129	
47 Northern Ontario Wires Inc.	\$464.54	\$236.90	\$227.64	5,977	
48 Rideau St. Lawrence Distribution Inc.	\$385.26	\$136.35	\$248.91	5,910	
49 Hydro Hawkesbury Inc.	\$201.03	\$31.76	\$169.27	5,549	
50 Renfrew Hydro Inc.	\$315.32	\$97.70	\$217.62	4,325	
51 Wellington North Power Inc.	\$478.24	\$162.23	\$316.01	3,830	
52 Fort Frances Power Corporation	\$471.27	\$202.77	\$268.50	3,773	
53 Espanola Regional Hydro Distribution Corporation	\$501.73	\$217.89	\$283.84	3,309	
54 Sioux Lookout Hydro Inc.	\$546.28	\$252.95	\$293.33	2,848	
55 Hearst Power Distribution Company Limited	\$408.05	\$175.84	\$232.22	2,700	
56 Cooperative Hydro Embrun Inc.	\$296.26	\$34.99	\$261.28	2,366	
57 Atikokan Hydro Inc.	\$681.34	\$304.13	\$377.21	1,629	
58 Hydro 2000 Inc.	\$408.60	\$33.39	\$375.20	1,244	
59 Chapleau Public Utilities Corporation	\$680.90	\$148.40	\$532.50	1,222	
<b>Total Industry</b>	<b>\$317.59</b>	<b>\$154.68</b>	<b>\$162.91</b>	<b>5,253,152</b>	
<b>Toronto Hydro and Hydro One</b>	<b>\$392.05</b>	<b>\$220.68</b>	<b>\$171.37</b>	<b>2,121,863</b>	
<b>Total Industry excl. Toronto Hydro and Hydro One</b>	<b>\$267.13</b>	<b>\$109.95</b>	<b>\$157.17</b>	<b>3,131,289</b>	

<b>North Bay Unfavourable Variance to Adj. Industry</b>	-\$14.30	-\$3.89	-\$10.41
<b>Percentage Unfavourable Variance</b>	-5.08%	-3.42%	-6.21%
<b>Dollar Impact</b>	-\$346,070	-\$94,218	-\$251,852