



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
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October 5, 2021
Our File: EB20210027

Attn: Christine Long, Registrar

Dear Ms. Long:

Re: EB-2021-0027 – Grimsby Power Inc. – 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.

Fred Zheng

cc: Ted Doherty, 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, as amended (the “OEB Act”);

AND IN THE MATTER OF an Application by Grimsby Power
Inc. (the “Applicant”) under Section 78 of the OEB Act 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 January 1, 2022.

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

1-SEC-1

[Ex.1] Please provide copies of all benchmarking studies, reports, and analyses that the Applicant has undertaken or participated in since its last rebasing application, that are not already included in the application.

1-SEC-2

[Ex.1] Please provide a copy of all documents that were provided to the Board of Directors in approving the underlying budgets contained in the Business Plan and this Application.

1-SEC-3

[Ex.1; EB-2015-0072 Decision, p.7] In the EB-2015-0072 Decision, the Board noted that “During the oral hearing, Mr. Curtiss expressed Grimsby Power’s intention to search for productivity improvements and bring them “front and center” over the next 5 years. The OEB supports this commitment and will continue to monitor the OM&A per customer and related productivity measures”. Please provide details of all productivity and efficiency measures the Applicant has undertaken since its last rebasing application in 2016. Please quantify the savings and explain how they were calculated.

1-SEC-4

[Ex.1] Please provide details of all productivity and efficiency measures the Applicant plans to undertake in the test year. Please quantify the savings and explain how they were calculated.

1-SEC-5

[Ex.1, Tab 3, Attachment 1, p.23] Please provide a revised version of Table 7 that includes 2021 year-to-date actuals, as well as at the same point in time in the year, both 2019 and 2020 year-to-actuals.

1-SEC-6

[Ex.1, Tab 6, p.17] Please update Tables 1-11 to 1-14 for the 2020 OEB Scorecard information released on September 10, 2021.

2-SEC-7

[Ex.2, Tab 1, p.2; Ex.2 Tab 2, p.7] Please provide a revised version of Tables 2-1 and 2-19 that include 2021 year-to-date actuals, as well as at the same point in time in the year, both 2019 and 2020 year-to-actuals.

2-SEC-8

[Ex.2, Tab 1, p.7] Please provide cost details and anticipated completion time of projects that contribute to the increase in gross fixed assets in-service of \$1,809,104 in 2020 in comparison to 2019.

2-SEC-9

[Ex.2, Tab 1, p.8] Please provide anticipated completion time of the referenced System Renewal and System Service projects.

2-SEC-10

[Ex.2 Tab 1, p.9] The variance between the 2022 Test Year and the 2021 Bridge Year rate base is the highest since GPI's last application in 2016. Please provide a table showing evenly paced increase in capital expenditure during the period from 2016 to 2026.

2-SEC-11

[Ex.2, Tab 2, p.7] Please provide explanations to the underspent in capital expenditures in each year from 2016 to 2019.

2-SEC-12

[Ex.2 Tab 2, Attachment 1, p.1] Please provide a revised version of Appendix 2-AB that includes as the 2021 'Plan' amount, the Applicant's internal forecast expenditures approved at the beginning of the year.

2-SEC-13

[Ex.2, Tab 2, p.10] Please provide cost details of the Casablanca Blvd project, including cost forecast of the project and actual capital expenditures incurred to date. Please also provide anticipated completion time of the project.

2-SEC-14

[Ex.2, Tab 2, p.10] Please provide cost details for the additional 3rd feeder from NW MTS. Please confirm 2022 Test Year forecast does not include cost related to the additional 3rd feeder.

2-SEC-15

[Ex.2, Tab 3, Attachment 1, p.87, Table 28] The Applicant has provided forecast capital expenditures by category between 2023 and 2026 in Appendix 2-AB. Please provide a revised version of Appendix 2-AA that includes planned expenditures between 2023 to 2026.

2-SEC-16

[Ex. 2, Tab 3, Attachment 1, p.61] Using the same asset categories as provided in Table 21, please provide the number of assets replaced or planned to be replaced for each year between 2016 to 2026.

2-SEC-17

[Ex.2, Appendix 2-AA] For each system renewal, program included Appendix 2-AA, please provide a table that shows the number of assets replaced or planned to be replaced in each year between 2016 to 2022. Please provide the response in excel format.

2-SEC-18

[Ex. 2, Tab 3, Attachment 1, p.111] With respect to the Residential Expansions:

- a. The Applicant states: “New subdivisions/developments subject to economic evaluation. A subdivision/development will have a capital contribution from the developer that considers 25 years of operating revenue.” Yet, the Applicant has not forecast any capital contributions related to its Residential Expansion Program between 2022 and 2026. Please reconcile.
- b. For each year between 2016 and 2021, please provide the total capital contributions that Applicant has received regarding its Residential Expansion Program.

3-SEC-19

[Ex.3, Tab 2, p.1] Please provide a revised version of Table 3-24 that includes 2021 year-to-date actuals, as well as at the same point in time during the year, both 2019 and 2020 year-to-actuals.

4-SEC-20

[Ex.4, Appendix 2-JB] Please provide a corrected version of Appendix 2-JB that shows OM&A cost drivers between each year from 2016 and 2022.

4-SEC-21

[Ex.4, Tab 1, p.6] Please provide justifications to GPI’s selection of the benchmarking group.

4-SEC-22

[Ex.4, Tab 3, p.15] Please provide cost details related to the Utilismart, including any one-time cost and any incremental cost actually incurred or forecasted for each year since 2018.

4-SEC-23

[Ex.4, Tab 3, p.2] Please provide a revised version of Appendix 2-JC that includes 2021 year-to-date actuals, as well as at the same point in time during the year, both 2019 and 2020 year-to-actuals.

4-SEC-24

[Ex.4, Tab 3, p.15] With respect to the maintenance cost of poles, towers, and fixture:

1. Please provide a revised version of Table 4-16 including 2021 year-to-date actuals, as well as at the same point in time during the year, both 2019 and 2020 year to actuals.
2. Please provide forecast amount for each year of the Application period.

4-SEC-25

[Ex.4, Tab 3, p.16] Please provide Administration and Financial Cost (Labour) Actuals in each year from 2016 to 2020

4-SEC-26

[Ex.4, Tab 4, p.10] Please provide a revised Table 4-22 / Appendix 2-K including 2021 year-to-date actuals, as well as at the same point in time during the year, both 2019 and 2020 year to actuals.

4-SEC-27

[Ex.4, Tab 4, p.20] For each year between to 2016 and 2020, please provide the annual Corporate Performance Measures and Metrics used for incentive pay, and the actual end of year results for measure and metric.

4-SEC-28

[Ex. 4, Tab 6, Attachment 1] With respect to regulatory costs:

1. Please provide a breakdown of (one-time) consultants’ cost.

2. Please confirm that all application-related one-time costs are not included in 2017 to 2021 historic/bridge year OM&A costs.

4-SEC-29

[Ex.4, Appendix 2-K] Please provide a revised version of Appendix 2-K that includes two additional rows showing total compensation amounts allocated to capital and OM&A.

4-SEC-30

[Ex. 4, Tab 9, p.9] With respect to Accelerated CCA:

1. Please provide the supporting calculations for 2018.
2. Please provide a forecast of the 2021 calculations.

7-SEC-31

[Ex.7, Tab 1, p.3] Please provide the breakdown of and justifications to the 7.4 weighting factors attributed to GS 50-4,999 kW class.

8-SEC-32

[Ex.8, Tab 2, p.3] With respect to the increase in volumetric charge due to the adjustment for Transformer Allowance:

1. Please provide the number of customers in the General Service >50 to 4,999 kW class who provide their own step down transformation.
2. Please provide the amount of Transformer Allowance credit that BPI has actually paid out in each year from 2016 to 2021 and GPI's forecast of the same in each year of the Application period.

9-SEC-33

[Ex.9, Tab 1, p.7] With respect to Account 1508 - Other Regulatory Assets-Sub Account OEB Cost Assessment, please provide a table that shows for each year from 2016 to 2021, the calculation of the principal balance that is included in the account.

9-SEC-34

[Ex.9, Tab 1, p.7] For each Group 2 account that the Applicant is seeking to discontinue to the account, please provide a forecast of the balance to the end of 2021, including forecast 2021 principal balance. For each account, please explain how the 2021 principal was forecast.

Respectfully submitted on behalf of the School Energy Coalition this October 5, 2021.

Fred Zheng
Counsel for the School Energy Coalition