



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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October 14, 2021
Our File: EB20210018

Attn: Christine Long, Registrar

Dear Ms. Long:

Re: EB-2021-0018 – Energy+ 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);

AND IN THE MATTER OF an Application by Energy+ Inc. to the Ontario Energy Board for an Order or Orders approving or fixing just and reasonable distribution rates and other service charges to be effective January 1, 2022.

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

SEC-1

Please place on the record in this proceeding all evidence from EB-2018-0028 and EB-2019-0180 related to the Southworks Project. ((Note: It is sufficient for the Applicant to simply agree to deem its evidence in that proceeding on the record for this proceeding and provide a link to the OEB's WebDrawer, as opposed to re-filing all the material)).

SEC-2

[Ex.1, p.20] Please confirm that notwithstanding the OEB's decision to only approve a funding envelope of \$6,500,000, the Applicant's final cost for the Southworks Project is *higher* than what it originally requested.

SEC-3

[Ex.1, p.20] After the OEB's Decision in EB-2018-0028, please detail all attempts and investigations, implemented or otherwise, successful or otherwise, the Applicant took to reduce the cost of the Southworks Facility.

SEC-4

[Ex.1, p.23] Please provide any information provided to the Applicant's Board of Directors related to the Southworks Project after the issuance of the OEB's Decision in EB-2018-0028.

SEC-5

[Ex.1, p.20] If the OEB had approved the ACM request as include in the Applicant's 2019 Application of \$8,099,792, what would the total cost of the project have been.

SEC-6

[Ex.1, p.23, Table 12] The Applicant has provided a breakdown of the '2019 COS Approved Funding' into various cost categories. In the OEB's Decision in EB-2018-0028, it did not approved breakdown of costs. When and on what basis breakdown of the approved \$6.5M made.

SEC-7

[Ex.1, p.25, Table 14] Please provide the underlying information that is used to derive the minimum, average and maximum costs in Table 14.

SEC-8

[Ex.1, p.26, Table 15] Please explain how the Applicant estimated the \$996,833M of costs yet to be tendered.

SEC-9

[Ex.1, p.27] The Applicant states: “In 2020, and as part of the 2021 Budget, Energy+ reduced its capital spending to mitigate the overall impact of COVID-19 on the utility, while also recognizing that the cost forecast for the Southworks facility exceeded the approved \$6.5MM funding envelope”.

- a. Please provide further details.
- b. Please provide a revised version of Table 17 showing actual and any revised forecast capital expenditures in each year between 2019 and 2023.

Respectfully submitted on behalf of the School Energy Coalition this October 14, 2021.

Fred Zheng
Counsel for the School Energy Coalition