

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998,
being Schedule B to the Energy Competition Act, 1998, S.O.
1998, c.15;

AND IN THE MATTER OF an Application by Elexicon
Energy Inc. 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 for Elexicon Energy
Inc. as of January 1, 2022.

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

SEC-1

[Mgr. Summary, p.38] Please provide a copy of all material provided to the Applicant's Board of Directors regarding the proposed ICM projects.

SEC-2

[Mgr. Summary, p.38] Please provide a copy of any internal business cases for the proposed Projects, if different from the business cases filed with the Application.

SEC-3

[Appendix B] Please provide any information used by the Applicant in benchmarking of costs for projects similar to the two ICM projects, or advise that no benchmarking was carried out.

SEC-4

[Appendix B, p.6] Please provide a detailed capital projects table in the form established in the Board's Appendix 2-AA (normally applicable for cost of service applications), for 2022 and the previous four years, including all capital projects (i.e. not excluding merger-related projects). Please identify all projects in the table that are merger related (for example the CIS consolidation and upgrades).

SEC-5

[Appendix B, p.9] Please provide a calculation of the most recent achieved ROE for the VRZ separately.

SEC-6

[Appendix B, p.11] SEC notes that "the recent 2020 IRRP coincident load forecast for Whitby TS T1/T2 (27.6 kV) shows that for 2018 and 2019, the projected load from the 2016 report has not materialized." Please explain the lower than forecast load in the past years. Please provide details with respect to how the lower load forecast will impact the capital and operating costs of the Applicant going forward.

SEC-7

[Appendix B, p.17] Please confirm that the proposed in-service date of Seaton TS is December 31, 2022. If that is not correct, please advise the correct in-service date. If the in-service date is after the 2022 summer peak, please explain why it is being brought into service in 2022 rather than in the spring of 2023.

SEC-8

[Appendix B-1, p.1]. Please provide a table showing all retirements as a result of the BRT ICM project. Please calculate the impact on 2022 rate base, depreciation and cost of capital of those retirements.

SEC-9

[Appendix B-1, p.13] With respect to the BRT Relocation project, SEC notes “As the BRT Relocations work is initiated by external parties, the biggest risk to the project is external delays to starting the work. This risk is completely outside of Elexicon’s control.” Please explain, with supporting documents, EEI’s budgeting method and EEI’s budget estimate confidence level considering the uncontrollable factors noted above. Please confirm that the timelines of the project are as set forth in the business case, or provide a new forecast of timelines and in-service date.

SEC-10

[Appendix B-2, p.12] With regard to the Seaton TS project, please provide a revised Table 7 including 2020 actuals and 2021 year-to-date actuals.

SEC-11

[Appendix C, p.2] Please provide a detailed calculation showing the dollar impact on the proposed ESM threshold of the proposal to use 9.43% ROE rather than the current Board-approved ROE level for electricity distributors.

SEC-12

[Appendix C, p.3] Please confirm that, in the calculation of ROE under the Applicant’s proposal, both the revenues and the costs (including incremental capital and operating costs, interest, depreciation, and PILs associated with the BRT project and the Seaton TS) will be excluded from the calculation. If not confirmed, please provide more details on the Applicant’s proposal with respect to inclusion or exclusion of costs and revenues.

Respectfully submitted on behalf of the School Energy Coalition this October 26, 2021.

Jay Shepherd
Fred Zheng
Counsel for the School Energy Coalition