



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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December 2, 2021
Our File: EB20210052

Attn: Christine Long, Registrar

Dear Ms. Long:

Re: EB-2021-0052 – Ottawa River Power Corp. – 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;

AND IN THE MATTER OF an Application by Ottawa River Power Corp. for an Order or Orders approving or fixing just and reasonable rates for the distribution of electricity to be implemented as of May 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] 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 p.64, 70] Please provide revised versions of Table 20 and Table 23 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.

1-SEC-6

[Ex.1, Appendix 1E] Please provide details regarding METSCO Energy Solutions' experience in the field of public opinion research.

2-SEC-7

[Ex.2, p.49-63] Please explain the various analyses from previous DSP to include forecast 2020 and 2021 expenditures.

2-SEC-8

[Ex.2, Appendix 2-AB] Please confirm that capital expenditures are equal to in-service additions.

2-SEC-9

[Ex.2, Appendix 2-AA] Please provide a revised version of Appendix 2-AA that includes 2023-2026 expenditures that align with the proposed DSP spending included in Appendix 2-AB.

2-SEC-10

[Ex.2, DSP, p.116] Please provide cost details and completion timeline for the replacement of the power transformer failed in late June 2021.

2-SEC-11

[Ex.2, DSP, p.119] Please provide cost breakdown by project, and justification for the 101% increase in actual spending in System Renewal category between 2015 and 2019, particularly the significant increase in 2016, 2017, and 2018.

2-SEC-12

[Ex.2 DSP, p.119] Please provide cost breakdown by project, and provide a justification for the 218.3% increase in General Plant in 2019.

2-SEC-13

[Ex.2 DSP, p.123] With regard to the increased System Access actual spending in 2018 and 2019:

1. Please provide the number of new services installed and upgraded in 2018 and 2019.
2. Please explain the reason delaying the replacement of 1,000 failed meters.
3. Please provide cost details of the Petro-Canada driven plant relocation project.
4. Please provide cost details of the installation and connection of the pad-mounted transformer in 2019.
5. Please provide cost details of the relocation of overhead poles for the Paul Martin Drive project.
6. Please explain the reason for why projects referred to in parts 4 and 5 were not included in the DSP of previous applications.

2-SEC-14

[Ex.2 DSP, p.124] With regard to the increased System Renewal actual spending from 2015 to 2019:

1. Please provide justification to the decision to perform voltage conversion instead of full replacement and include any studies and reports consulted during pro and con analysis.
2. Please provide the number of additional poles replaced and the cost for additional pole replacement, as well as any other costs associated. Please also explain the reason the additional pole replacement was not accounted for in the previous DSP.

2-SEC-15

[Ex.2 DSP, p.135, Table 5-6] Please provide the information on which the breakdown estimate was based. Please also provide the total cost estimate and expected completion date for the upgrade and relocation.

2-SEC-16

[Ex.2 DSP, p.136 and 141, Table 5-7 and Table 5-10] With regard to the metering program:

1. Please explain the under-spending in 2015 and 2016.
2. Please provide a revised version of Table 5-7 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.
3. Please explain the pace of spending and justify the higher spending in 2022 in comparison to each year between 2023 and 2026.

2-SEC-17

[Ex.2 DSP, p.150, 157, Table 6-4 and Table 6-7] Please provide a revised version of Table 6-4 and Table 6-7 that includes 2021 year-to-date actuals, as well as the same point in time in the year, both 2019 and 2020 year-to-date actuals.

2-SEC-18

[Ex.2 DSP Section 6.3, p.161-170, general] With regard to the spending in Station Renewal:

1. Please confirm if Station Renewal is considered a part of System Renewal.
2. Please provide actual spending in each year between 2015 and 2021 in Station Renewal, including board approved amount.
3. Please explain the Applicant's endeavor to pace the spending in legacy station equipment replacement in each year since 2015.

2-SEC-19

[Appendix 2-AB, Table 2] Please confirm the months of actual data recorded for 2021. Please provide a revised version of Appendix 2-AB 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.

3-SEC-20

[Ex.3, Appendix 2-H] Please provide a revised version of Appendix 2-H 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-21

[Ex.4, p.8, Table 3, 16, Appendix 2-JA; Chapter 2 Appendices, Appendix 2-JC] Please provide revised versions of Appendix 2-JA and 2-JC that include 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-22

[Ex.4, p.18] With regard to the vacant position that potentially contributes to the increase in 2022 OM&A, please provide the title of the vacant position and the most recent date this position was filled.

4-SEC-23

[Ex.4, p.19] With respect to the increase of \$207,765 in Account 5085 between 2019 and 2020:

1. Please provide the breakdowns for \$129,738.73 of standby labour.
2. Please provide what portion of this increase is recorded in COVID Deferral Account.

4-SEC-24

[Ex.4, p.21] With regard to the increase of \$147,868 in customer billing, please explain if this increase is related to increase in number of customers. If yes, please provide the actual increase in number of customers during this period of time.

4-SEC-25

[Ex.4, p.24] Please confirm if the increase of \$126,783 in Account 5675 between 2018 and 2019 offset any other expenses.

4-SEC-26

[Ex.4, p.24] Please provide the Applicant's OM&A cost per customer benchmarking result, if any.

4-SEC-27

[Ex.4, p.43, line 5-6] Please provide the salary ranges of similar utilities in Ontario and the salary ranges of local similar workforces that the Applicant has consulted as a guideline.

7-SEC-28

[Ex.7 p.8, Table 2] Please justify the 10.0 weighting factor for Services Account 1855 attributed to GS >50 class.

9-SEC-29

[Ex.9, p.9] Please provide a forecast of the balance of Account 1508 – Pole Attachment Revenue Variance to the end of 2021.

9-SEC-30

[Ex.9, p.11] With respect to the Account 1592 – Sub-account CCA Changes:

1. Please explain why there is no accelerated CCA impact for 2018.
2. Please forecast the balance in the sub-account at the end of 2021, and provide similar supporting calculation as provided in Table 3.
3. Please provide for each year, including 2021 as requested in part 2, the full CCA continuity schedules with and without accelerated CCA.

Respectfully submitted on behalf of the School Energy Coalition this December 2, 2021.

Fred Zheng
Counsel for the School Energy Coalition