

ONTARIO ENERGY BOARD

IN THE MATTER OF Sections 86 and 18 of the Ontario Energy Board Act, 1998 S.O. 1998, c. 15, (Schedule B);

AND IN THE MATTER OF an application for leave to amalgamate North Bay Hydro Distribution Limited and Espanola Regional Hydro Distribution Corporation, into an entity referred to in this Application as “New NBHDL”, made pursuant to section 86(1)(c) of the Ontario Energy Board Act, 1998 and other relief as described under Section 2 of this application..

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

SEC-1

[p.7] Please provide the services agreement with PUC Services Inc and advise whether any service agreement between NHDL and EHRDC exist, and provide such agreement if exists.

SEC-2

[p,27] Please provide the underlying calculations (spreadsheets with formulas intact), and explanation of all assumptions, for Table 6-1. Please detail all assumptions made in the calculation

SEC-3

[p. 28] As NBHDL will assume the functions under the PUC Services Agreement, please advise whether NBHDL plans to increase its FTEs for this incremental responsibility? If yes, please provide the increase in FTEs and the new positions being created.

SEC-4

[p. 28] Please provide details and data relating to the duplication that the Applicants identified in both businesses.

SEC-5

[p. 29] As the Applicants anticipates there will be substantial infrastructure requirements of ERHDC over the next 10 years, does NBHDL plan to bring any ICM applications before its next rebasing?

SEC-6

[p.31] Although ERHDC and NBHDL have similar service territory characteristics, ERHDC has significantly better reliability as indicated by its lower SAIDI and SAIFI numbers. Please explain:

- a. What is the cause of this discrepancy?
- b. Does NBHDL plan post-amalgamation NBHDL to improve its reliability?
- c. If yes, how will NBHDL ensure this does not result in attrition in resources allocated to ERHDC territory and negatively impact the reliability for ERHDC customers?

SEC-7

[p. 34-35] Considering that Management Service and Control Center of ERHDC will be physically moved out of its service territory to North Bay, please advise whether the Applicants have assessed any negative impact on reliability and customer service performance for ERHDC.

SEC-8

[p.29 and p.39] The Applicant stated the following in the filed evidence:

It is anticipated that there will be substantial infrastructure requirements of ERHDC over the next 10 years. (p.29)

The Applicants propose a rebasing deferral period of five (5) years from the date of closing of the Proposed Amalgamation. (p.39)

Please estimate the impact of the anticipated capital investment of ERHDC on customers of NBHDL in comparison to stand-alone scenarios. Please advise as result of the proposed transaction whether these capital investments would negatively impact customers of NBHDL after 2027.

SEC-9

[General] Please provide in which efficiency cohort each of ERHDC and NBHDL is assigned, and in which cohort would the Applicants anticipate the post-amalgamation entity will be assigned?

SEC-10

[General] For ERHDC and NBHDL, please provide a table with a side-by-side comparison of the current approved distribution rates, broken down by each component such as monthly service charge, variable rate, group 2 DVAs, low voltage charge etc.

SEC-11

[General] Please provide further calculation details and explanation to the proposed forecast “net (costs)/synergies” for each year?

Respectfully submitted on behalf of the School Energy Coalition this February 7, 2022.

Fred Zheng
Counsel for the School Energy Coalition