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BY EMAIL and RESS

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

June 27, 2022
Our File: EB20220158

Attn: Nancy Marconi, Registrar

Dear Ms. Marconi:

Re: EB-2022-0158 – Niagara-on-the-Lake Hydro – 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.

Mark Rubenstein

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, 3 Schedule B, as amended;

AND IN THE MATTER OF an Application by Niagara-on-the-Lake Hydro Inc. for an Order or Orders under section 78 of the OEB Act effective July 1, 2022.

INTERROGATORIES ON BEHALF

OF THE

SCHOOL ENERGY COALITION

SEC-1

[p.8] The Applicant seeks "An Order amending the Specified Customer Revenue Variance Account to a general Large Use Customer Revenue Variance Account." Please provide a copy of the draft Accounting Order for the proposed Large Use Customer Revenue Variance Account. Please also provide a blacklined copy compared to the Specified Customer Revenue Variance Account to which the Applicant seeks to amend.

SEC-2

[p.11] The Applicant states that "[u]nder this amended order, the 5 MW variance account would apply to each Large Use customer":

a. Is the proposed Account intended to capture variances in distribution revenue when i) each Large Use Customer's actual monthly demand is above or below 5 MW (i.e. it records differences in a customer's distribution revenue between actual demand and 5 MW), or ii) when the total actual demand of the all Large Use customers is above or below 5 MW (i.e. it records the difference between the total actual demand of the Specified Customer and all new Large Use customers, including the cryptocurrency mining customer, and 5 MW)?

b. If the answer to part (a) is (i), please explain why that is appropriate considering the cryptocurrency mining customer, and any other Large Use customer, except for the Specific Customer, was not a customer, nor forecast to be a customer, in EB-2018-0056, and so not included in the load forecast used to set base rates.

SEC-3

[p.11] Please explain how the proposed Account would operate in the following circumstance: An existing GS>50 customer with a load of 1 MW expands to 5 MW and is re-classified as a Large Use customer. After a period of time, the customer demand returns to 1 MW and so is re-classified back to GS>50.

SEC-4

[p.11] With respect to the new cryptocurrency mining customer:

a. The Applicant forecasts demand of 20 MW (p.9) for the customer while noting that it has requested 80 MW of transmission line capacity for the customer (p.4). Please reconcile the difference in forecast demand.
b. Please provide a status update on the connection of this new customer.
c. Please provide the incremental distribution revenue (distribution fixed and variable charge) expected with the addition of this new customer both in 2022 and 2023. Please provide the full details of the calculation.

SEC-5

[p.5] Please provide the monthly entries and total balance in the Specific Large Use Customer Revenue Variance Account.

SEC-6

[p.11] Please provide the total distribution revenue (distribution fixed and variable charge) forecast to be collected in 2022 and 2023 from all customers, both including and excluding the new cryptocurrency mining customer (or any other forecast new Large Use customer).

SEC-7

Please also provide the Applicant's materiality threshold.

Respectfully, submitted on behalf of the School Energy Coalition, this June 27, 2022.

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Mark Rubenstein
Counsel for the School Energy