

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an Application by Alectra Utilities Corporation 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 as of January 1, 2023.

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

SEC-01

[General] Please provide a copy of all material provided to the Applicant's Board of Directors or any of its committees regarding cable replacement or injection activities planned for 2023 or 2024, whether part of the ICM projects or otherwise.

SEC-02

[General] Please provide a copy of all internal business cases related to cable replacement or injection activities planned in 2023 or 2024 in any of the Applicant's rate zones.

SEC-03

[General] Please provide any information used by the Applicant in benchmarking the costs for cable renewal projects over the period 2017 to 2024, or advise that no benchmarking has been carried out.

SEC-04

[Ex. 1-1-4 p.2] The Applicant's next rebasing is 2026 and the Applicant forecasts that "one out of every four neighborhoods in its service territory will be served by deteriorated and unreliable cables by 2025 the current condition of the cables will cause". Please provide the Applicant's plan, including cost details and repair options, to respond to the impact of the forecasted deteriorating condition of the cable in some of the neighbourhoods in its service territory for the year of 2025 if this ICM application is not approved by the OEB.

SEC-05

[Ex. 2-1-1 p.15] Please justify and explain how does each of the proposed ICM investments for 2023 (\$8,729,165, or 3.03% of the 2023 capital budget) and the maximum eligible incremental capital for 2024 (\$7,886,792 or 2.69% of the 2024 capital budget) satisfy the project-specific materiality test in light of the OEB's ACM report and OEB precedents.

SEC-06

[Ex. 3-1-1, p. 3] The Applicant identified deteriorating conditions of underground cables as an emergent need to be addressed. The Applicant also prioritized spending in IT related programs while reducing

capital spending in the system access and system renewal categories. Please explain the decision to prioritize capital spending in other areas instead of replacing or maintaining underground cables.

SEC-07

[Ex. 3-1-1, p. 11] Please confirm that the Applicant is seeking to qualify Guidehouse as expert witnesses. If confirmed, please specify the expertise claimed and provide all supporting material including CVs and expert acknowledgements in the OEB's standard form. If not confirmed, please provide the basis on which the Applicant offers the opinions of non-experts as evidence for the OEB. In either case, in responding to all interrogatories please specify those responses authored by Guidehouse.

SEC-08

[Ex. 3-1-2, p. 4] Please provide a set of tables showing the total length of direct-buried XLPE cable, and the total number of customers in each of the Applicant's rate zones, and the customer hours of interruption in each of those rate zones due to failure of those cables, for each of 2017 to 2021.

SEC-09

[Ex. 3-1-4, p. 10] Please explain the rationale for prioritizing the "base" cable renewal projects over the ICM cable renewal projects in each rate zone.

SEC-10

[Ex. 3-1-4, p. 13] Please provide a table in the form of Table 21 for each of the Applicant's rate zones.

SEC-11

[Ex. 4-1-1, attachment 12, p.1] Please provide a copy of the updated DSP referred to in footnote 1, in the form and including all supporting materials as provided to Guidehouse for their analysis..

SEC-12

[Ex. 4-1-1, attachment 12, p.7] Please provide details regarding the weighted inspection scores, including scoring categories and their weights.

SEC-13

[Ex. 4-1-1, attachment 12, p.8] Please confirm if the Applicant's ACA has taken into account only the age of the assets in assessing the condition of any category of its assets.

SEC-14

[Ex. 4-1-1, attachment 12, p.19] Please explain the forecasted significant increase in the general plant category in 2023 and 2024 in comparison to the average from 2020 to 2022, especially in light of this ICM application seeking additional system renewal capital funding.

Respectfully submitted on behalf of the School Energy Coalition this July 11, 2022.

Fred Zheng
Counsel for the School Energy Coalition