

**IN THE MATTER OF the Ontario Energy Board Act 1998,
S.O. 1998, c. 15, (Schedule B);**

AND IN THE MATTER OF an Application by Newmarket-Tay Power Distribution Ltd. for an Order or Orders approving or fixing just and reasonable rates and other charges for the distribution of electricity within its Newmarket Service Area, as of the date of the Ontario Energy Board's rate order.

**INTERROGATORIES
OF THE
SCHOOL ENERGY COALITION**

1. [Ref: 1.1.13] With respect to each of the seven dormant subsidiaries, please advise:
 - a. The original business purpose of the company;
 - b. Whether the company has any existing assets or liabilities relating to the distribution business;
 - c. Whether the company has any existing contractual relationships relating to the distribution business;
 - d. Whether the company has any tax loss or other tax account carry-forwards and, if so, the circumstances in which those tax accounts originally arose.
2. [Ref: 1.1.14] Please provide further details on the Administrative Structure Review, including who is carrying it out, when it started and is expected to be completed, its scope, and its current status.
3. [Ref: 1.2] Please provide a summary of why, in the Applicant's view, rate base has grown by only 12.8% in the last nine years, while customer numbers and load have grown by more than 20% each.
4. [Ref: 1.2] Please confirm that the Applicant proposes to forego any deficiency in 2008 relating to the period between May 1, 2008 and the date of the Board's order in this application. Please advise how the Applicant proposes to deal with any sufficiency during that same period, should the Board's decision result in a sufficiency for 2008.
5. [Ref: 1.3.2 and 5.1.1] Please provide a copy of any accounting orders authorizing the inclusion of the OEB, OMERS and Mearie amounts in Account 1508.
6. [Ref: 2.1] Please provide any studies or analyses in the possession of the Applicant on the working capital requirements of the distribution business.

7. [Ref: 2.1.2] Please provide a chart setting out, for each year from 1999 to 2008, the actual net fixed assets after depreciation for each of the fixed asset categories listed in 2.1.3. Please explain why overall rate base decreased from 1999 Board approved to 2006 actual. Please provide any studies, memoranda, correspondence or other documents in the Applicant's possession relating to the capital investment plan for that period, and in particular any documents that deal in whole or in part with constraints on capital investment.
8. [Ref: 2.1.5/6/7] For each project that is included in more than one fixed asset category, and/or more than one rate year (for example, "Rebuild Davis and Prospect/South Lake Regional Hospital Upgrade"), please provide an overall project cost, broken down by expense category and by year.
9. [Ref: 2.2.2] Please provide a copy of the Applicant's actual capitalization policy, showing any formulae, rules, and/or procedures utilized to determine capitalized amounts.
10. [Ref: 2.3] Please provide a more detailed breakdown of working capital allowance for each year. The preamble refers to individual accounts, but 2.3.1 shows only a single line item.
11. [Ref: 3.1.2] Please provide the Applicant's backup documentation and calculations for the 2006-2008 throughput, customer counts, and average consumption, by class, including all studies, memoranda, and other written material relating to the 2008 forecasts.
12. [Ref: 3.2] Please reconcile the figure of 9,964 kwh per residential customer with the figure of 9,862 kwh per customer in 3.1.2.
13. [Ref: 3.2] Please advise how many schools Newmarket has in each of the GS<50 and GS>50 classes.
14. [Ref: 3.3] Please provide the Applicant's "Interest Earned" actuals for each of 2002 through 2005.
15. [Ref: 4.2.2] Please provide details on the "annual meter information service contract".
16. [Ref: 4.2.2] Please provide details of the \$90,000 increase in building rental, including owner of building and relationship to Applicant, copy of appraisal, copy of lease amendment, and any internal documents supporting or analysing the increase.
17. [Ref: 4.2.2] Please provide a detailed list of all costs associated with the Tay merger that show as OM&A or capital expenditures in the Historical, Bridge, or Test Year numbers in the Application.
18. [Ref: 4.2.7] Please provide a detailed explanation of the 9.5% increase in base compensation per employee from 2006 to 2007.

19. [Ref: 4.3] Please explain why 2006 and 2007 use accounting income, and 2008 uses regulatory income. Please quantify the impact of that difference on the calculations, and present the calculations consistently for all three years.
20. [Ref: 4.3] Please provide a copy of the Applicant's latest federal and provincial tax returns.
21. [Ref: 4.3 and 6.1.2 and 6.2] Please provide a copy of all current long term debt instruments. Please advise which debt is with non-arms length parties. Please provide all amending documents relating to non-arms length debt since 2002. Please provide all reports or other documentation relating to any changes in interest rate since the debt was created.
22. [Ref: 5.1.1] Please explain why transmission network and connection costs have historically been less than revenues from customers. Please provide backup documentation supporting the differences between the rate decreases from the IESO and the proposed rate decreases to customers.
23. [Ref: 8.1] Please advise the Applicant's plan to achieve a revenue to cost ratio for GS>50 class of 1.0, including the length of time to get to that result.
24. [Ref: 8.1] Please provide the chart on page 141 using 2008 proposed data, in live Excel format.
25. [Ref: 8.2 and 9.1] Please restate the proposed 2008 rates on the assumption that the GS>50 fixed charge is set at the Board's maximum of \$155.86 and the volumetric rate is adjusted accordingly.
26. [Ref: 9.1] Please restate the proposed 2008 rates on the assumptions that GS>50 is at a revenue to cost ratio of 120%, street lighting is at a revenue to cost ratio of 70%, and any revenue requirement differential thus created is used to adjust residential rates.
27. [Ref: 9.1] Please advise what percentage of the streetlighting class revenue is received from entities that are not at arms length to the Applicant.
28. [Ref: 9.1.4] Please advise the percentage rate impact, by class, of using the 2007 loss factor instead of the five year average.
29. Please file a copy of the most recent Strategic Plan or similar document for the Applicant, and the most recent Strategic Plan or similar document for Newmarket Hydro Holdings Inc.