



BY EMAIL and RESS

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

Attn: Nancy Marconi, Registrar

Dear Ms. Marconi:

Re: EB-2023-0039 – NT Power IRM – SEC Interrogatories

We are counsel to the School Energy Coalition ("SEC"). Enclosed, please find SEC's interrogatories in this matter.

Yours very truly,
Shepherd Rubenstein P.C.

Mark Rubenstein

cc: Brian McKay, SEC (by email)
Applicant and intervenors (by email)

Mark Rubenstein
mark@shepherdrubenstein.com
Dir. 647-483-0113

February 9, 2024
Our File: EB20230039

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an Application by Newmarket-Tay Power Distribution Ltd. 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, effective May 1, 2024.

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

SEC-1

[p.16-22] With respect to the proposed adjustment to correct the errors made:

- a. Please provide the total interest it seeks to collect and the breakdown by year related to the proposed adjustment.
- b. Please provide a table that shows for each of Account 1588 and 1589, the total amount being sought from each customer class because of the proposed adjustment.
- c. Please provide a bill impact table, for each customer class, that shows the impact of the proposed adjustment. Please provide all underlying calculations.

SEC-2

[p.18] The Applicant states: “CT 2148 is effectively a balancing adjustment to the original CT 148 Global Adjustment charge from the IESO. Its accounting treatment therefore requires apportionment between the two classes of customers that ultimately pay for the CT 148 charge – RPP Class B customers and Non-RPP Class B customers. NT Power confirms that this charge type adjustment has been appropriately apportioned, on the basis of each customer class’s consumption for the month in which the correction pertains to. Specifically, of the total kWh for the month in which the adjustment pertains to, RPP consumption represented 64.26% of total Class B consumption and Non-RPP kWh consumption represented 35.74%, resulting in the allocated amounts of \$274,795 and \$494,079, respectively.” If the total Non-RPP kWh consumption was 35.74% of total class B consumption, please explain why Account 1589 was allocated \$494,079, and not \$274,795.

SEC-3

[Appendix A] With respect to the project budget.

- a. Please provide a breakdown of the project budget.

- b. The Applicant notes that the estimated cost of the project was provided by the constructor during the tender process.
 - i. Please confirm that the Applicant undertook a specific competitive procurement for this project.
 - ii. Please provide the number of bidders for the project and on what basis the contractor was selected.

Respectfully, submitted on behalf of the School Energy Coalition on February 9, 2024.

Mark Rubenstein
Counsel for the School Energy Coalition