



**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-2024-0116 – B2M LP 2025-2029 – SEC Interrogatories**

We are counsel to the School Energy Coalition (“SEC”). Attached, please find SEC’s interrogatories.

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

August 20, 2024  
Our File: EB20240116

**ONTARIO ENERGY BOARD**

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

**IN THE MATTER OF** an Application by B2M Limited Partnership, by its general partner Hydro One Indigenous Partnerships Inc. (HOIP), for an Order or Orders made pursuant to section 78 fo the Act approving revenue requirement for the transmission of electricity.

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

**A-SEC-1**

[A-4-1, p.4] Please confirm that the current Hydro One Networks Inc. transmission approved stretch factor is 0.15%.

**F-SEC-2**

[F-2-1, p.3] Please provide a breakdown of the B2M LP's OM&A expenses in each year between 2020 and 2029, into the following categories:

- a. Labour provided by Hydro One Networks Inc.
- b. Other Labour
- c. Non-Labour provided by Hydro One Networks Inc.
- d. Other Non-Labour

**F-SEC-3**

[F-2-1, p.3-5] Please provide a more detailed explanation, including specific basis and underlying assumptions, for the forecast 2024 to 2029 maintenance expenses.

**F-SEC-4**

[F-2-1] Has Hydro One Networks Inc. undertaken or participated in any compensation benchmarking studies since those filed in EB-2021-0110? If so, please provide copies.

**F-SEC-5**

[F-3-1, Attachment 1] Please provide the amounts paid or forecast to be paid to Hydro One Networks Inc. pursuant to the SLA for each year between 2020 and 2029, broken down by, i) Operational Fees, ii) Management Fees, and iii) any other payments.

**F-SEC-6**

[F-6-1, Attach 2; A-5-1, p.2] The evidence is that Hydro One Networks Inc. has a 65.7% ownership interest (as a LP) in B2M LP. Yet, B2M LP appears to allocate Hydro One Networks Inc. 72.3% of the annual forecast taxable income for income tax expense purpose (Ln 8/Ln 11). Please explain why.

**G-SEC-7**

[G-1-1] With respect to the long-term debt:

- a. [p.4] The evidence is that B2M LP issues debt to Hydro One Inc. to reflect Hydro One's debt issued to third-party investors. Does Hydro One Inc. issue debt specifically for B2M LP or is B2M LP allocated a portion of a larger debt issuance?
- b. [p.5] Please update the forecast February 2025 debt issuance based on the most recent available information (i.e. Consensus Forecast, new issues spreads, etc.).
- c. [p.5] Please explain why B2M LP is replacing a 5-year debt issuance with a 10-year debt issuance and why that is reasonable.
- d. Please provide Hydro One Networks Inc.'s current actual average long-term debt rate.

Respectfully, submitted on behalf of the School Energy Coalition this August 20th, 2024.

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Mark Rubenstein  
Counsel for the School Energy Coalition