



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-2024-0117 – NRLP 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: EB20240117

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 Niagara Reinforcement Limited Partnership (“NRLP”) by its general partner, Hydro One Indigenous Partnerships Inc. (HOIP), for an Order or Orders made pursuant to section 78 of 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.3] Please confirm that the current Hydro One Networks Inc. transmission approved stretch factor is 0.15%.

F-SEC-2

[F-2-1, p.2] Please provide a breakdown of the NRLP’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 Network 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] The evidence is that Hydro One Networks Inc. has a 54.9% ownership interest (as a LP) in NRLP. Yet, NRLP appears to allocate Hydro One Networks Inc. differing amount of taxable income each year between 2024 and 2029 (ranging from a low of 44% in 2025 to a high of 60% in 2027) for the purposes of the income tax expense (See Ln 8/Ln 12). Please explain why.

G-SEC-7

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

- a. [p.4] The evidence is that NRLP 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 NRLP or is NRLP 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 NRLP 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.

Mark Rubenstein
Counsel for the School Energy Coalition