

ONTARIO ENERGY BOARD

IN THE MATTER OF an application made by Windsor Canada Utilities Ltd. for leave to acquire 100% of the issued and outstanding shares of E.L.K. Energy Inc. from The Corporation of the Town of Essex, made pursuant to section 86(2)(a) of the *Ontario Energy Board Act, 1998*.

AND IN THE MATTER OF a Notice of Proposal made by Windsor Canada Utilities Ltd. under sections 80 and 81 of the *Ontario Energy Board Act, 1998*.

INTERROGATORIES

FROM THE

SCHOOL ENERGY COALITION

1. [Application p. 17] Please provide a similar Regulated Return on Equity chart for Enwin.
2. [App. p. 18] Please explain why the combination of ELK and Enwin does not achieve the result of restoring “financial and operational viability of the utility moving forward”.
3. [App, p. 18] Please explain why the Applicants are proposing to file a five year DSP when at the same time requesting a ten year deferred rebasing period.
4. [App, p. 23] Please describe what other benefits are expected to arise in Phase 2 in addition to those described for Phase 1.
5. [App, p. 24] Please provide the backup calculations and analysis supporting Table 8. Please include explanations supporting the estimates of exactly 35% revenue increase in 2027 and exactly 20% revenue increase in 2032 for ELK.
6. [App, p. 25] Please describe the tax implications, if any, on the Applicants or Enwin arising out of the change of control.
7. [Enwin Financials, p. 31] Please file the most recent financials of WCUL.
8. [Enwin Fin., p. 32] Please file the Management Services Agreement between WCUL and Enwin, and describe any changes to that agreement contemplated as a result of Phase 1.
9. [ELK Financials] Please file the December 31, 2024 financial statements of ELK Energy Inc..

10. [ELK Fin., p. 2] Please explain why the Administration Expenses portion of OM&A was allowed to reach 66% of the total. Please describe the extent, if any, to which that high cost is associated with unregulated services being provided by the utility. To the extent that the Admin ratio has increased or decreased in 2024, please describe the reasons for that change.

Respectfully submitted on behalf of the School Energy Coalition this July 18, 2025.

Jay Shepherd
Counsel for the School Energy Coalition