



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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August 18, 2025
Our File: EB20250209

Attn: Ritchie Murray, Acting Registrar

Dear Mr. Murray:

Re: EB-2025-0209 – Ottawa River Power Corp. Accounting Order – 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)

ONTARIO ENERGY BOARD

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 Ontario
River Power Corporation (“ORPC”) under section 78 of the
Ontario Energy Board Act, 1998 for an accounting order.

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

SEC-1

[p.2] Please provide the specific regulatory mechanism or policy that ORPC is relying on for the relief it seeks, and how ORPC meets each of its specific requirements.

SEC-2

[p.2] With respect to the formula error made in Appendix 2-BA (EB-2021-0052):

- a. Please confirm that the identified formula errors were included in all versions of Appendix 2-BA filed in the proceeding (EB-2021-0052) by ORPC, including as part of the pre-filed evidence, interrogatory responses, and the Settlement Proposal.
- b. If (a) is confirmed, please confirm that the result was that the revenue requirement and bill impacts applied for, at each stage, were lower than would otherwise have been the case if there had been no formula error.
- c. Please confirm that it was ORPC who made changes to the standard Appendix 2-BA Excel spreadsheet, which resulted in the formula errors described in the evidence.

SEC-3

[EB-2021-0052, [Settlement Proposal](#), p.7] Please confirm the EB-2021-0052 approved Settlement Proposal includes the following: “Included with the Settlement Proposal are attachments that provide further support for the proposed settlement. The Parties acknowledge that the attachments were prepared by ORPC. The intervenors and OEB Staff have reviewed the attachments. However, the intervenors are relying on the accuracy of the attachments and the underlying evidence in entering into this Settlement Proposal.”

SEC-4

Did ORPC include the ICM project in its rate base calculation for the purposes of its 2022 to 2024 RRR filings?

SEC-5

[p.5] ORPC proposes the account capture the annual revenue requirement impact beginning May 1, 2022. Please provide ORPC's view on the permissibility of the retroactive effective date. In your response, please address the OEB's [Decision and Rate Order](#) in EB-2017-0045 (pages 17-21).

SEC-6

[p.5] With respect to the ICM project:

- a. Please provide a table that shows the annual revenue requirements (and all underlying calculations) for the ICM project, each year between 2022 and 2026.
- b. Please provide a table that shows the difference each year between what the annual revenue requirements included in part (a), and the annual amount ORPC recovered in base rates.

SEC-7

[p.2] If the OEB were to determine that the adjustment should be made with respect to prospective amounts only and implemented right away, please provide proposed riders based on:

- a. ORPC's proposed methodology.
- b. Based on the difference outlined in part (b) of SEC-6.

Please provide all supporting calculations.

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

Mark Rubenstein
Counsel for the School Energy
Coalition