



**BY EMAIL and RESS**

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Ontario Energy Board  
2300 Yonge Street  
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Toronto, Ontario  
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September 23, 2025  
Our File: EB20250241

**Attn: Ritchie Murray, Acting Registrar**

Dear Mr. Murray:

**Re: EB-2025-0241 – Milton Hydro Distribution Inc. Accounting Order – Interrogatories**

We are counsel to the School Energy Coalition ("SEC"). Pursuant to the Notice of Hearing and Procedural Order No. 1, attached please find SEC's interrogatories in the above-captioned 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*,  
being Schedule B to the Energy Competition Act, 1998, S.O.  
1998, c.15;

**AND IN THE MATTER OF** an Application by Milton  
Hydro Distribution Inc. (“MHDI”) to the Ontario Energy  
Board for an Order or Orders establishing a variance account..

**INTERROGATORIES**

**ON BEHALF OF THE**

**SEC-1**

[p.2] Please provide the specific regulatory mechanism or policy that MHDI is relying on for the relief it seeks (e.g. Z-Factor, ICM, etc.), and how MHDI meets each of its specific requirements.

**SEC-2**

[EB-2022-0049, [Decision and Order](#), October 13, 2022] Please confirm that the terms of the approved EB-2022-0049 Settlement Proposal make no provision for MHDI to seek an accounting order or any other relief regarding the outcome of the independent third-party review during the IRM term.

**SEC-3**

[p.7] MHDI states: “The decision to advance the study was a proactive measure to identify and correct potential inaccuracies sooner, rather than waiting for the next rebasing. MHDI is committed to accurate accounting and compliance with the OEB's ARC”.

- a. Is MHDI’s position that before the changes to its corporate cost allocation methodology its accounting was inaccurate? If so, please explain how.
- b. Is MHDI’s position that before the changes to its corporate cost allocation methodology it was out of compliance with the OEB’s ARC? If so, please explain how, including with reference to specific provisions of the ARC.

**SEC-4**

With respect to the 2023 rate year:

- a. Please confirm that the approved EB-2022-0049 Settlement Proposal set rates for 2023.
- b. Please confirm that MHDI’s actual ROE was higher than the amount included in approved rates.
- c. If (b) is confirmed, please provide all drivers for the overearning and explain all costs and revenue variances, between the approved amount. For each variance in specific cost or revenue, please explain why it is not a similar inaccuracy.

**SEC-5**

[p.2; Appendix 2, p.5-6] MHDI states that, “Atrium Economics was retained by MHDI to support the process of updating and evaluating Milton Hydro’s affiliate cost allocation methods to ensure that Milton Hydro’s methodology to allocate costs between its affiliates is reasonable.” However, the Atrium Report appears to simply provide an opinion on the appropriateness of the updated cost allocation methodology and makes no reference to supporting the process of updating the methodology.

- a. Please confirm the scope of Atrium’s engagement.
- b. Please provide a copy of the Atrium engagement letter, scope of work, and any similar documents.
- c. Please provide all written analysis and opinions of Atrium regarding the methodology used in the 2023 rates application.

**SEC-6**

[Appendix 2] With respect to the shared service allocation:

- a. Please provide a copy of the most recent financial statement of MHDI and each of the affiliates (MHDI and MEGS).
- b. Please provide a copy of each shared service (or similar) agreement between MHDI and its affiliates, both in place at the time of the 2023 application and now.
- c. Please provide the basis, and all supporting calculations, and working papers, used to calculate the changes in the allocation methodology.

Respectfully, submitted on behalf of the School Energy Coalition this September 23, 2025.

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Mark Rubenstein  
Counsel for the School Energy  
Coalition