



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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October 21, 2025
Our File: EB20240115

Attn: Ritchie Murray, Acting Registrar

Dear Mr. Murray,

Re: EB-2024-0115 – Hydro Ottawa Limited 2026-30 – SEC Interrogatories on Staff Evidence

We are counsel to the School Energy Coalition ("SEC"). Attached, please find SEC's interrogatories on OEB Staff evidence.

Yours very truly,
Shepherd Rubenstein P.C.

Mark Rubenstein

cc: Brian McKay, SEC (by email)
Jane Scott, SEC Consultant (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 Hydro Ottawa
Limited (“Hydro Ottawa”) pursuant to section 78 of the OEB
Act, approving or fixing just and reasonable distribution rates
effective January 1, 2026.

**INTERROGATORIES TO OEB STAFF ON
ON BEHALF OF THE
SCHOOL ENERGY COALITION**

M1-SEC-1

[M1] Please provide a copy of Christensen Associates Energy Consulting, LLC’s (“CA Energy”) retainer and all instructions provided by OEB Staff. [Please note: Compensation/payment information can be redacted].

M1-SEC-2

[M1] CA Energy has provided an evaluation of certain aspects of the Hydro Ottawa proposed rate framework (see para. 6), but not others e.g. components of the capital-related revenue requirement, revenue vs price cap etc.). Is SEC to understand that if CA Energy did not comment on those aspects of the proposed framework it has no issues or that it simply did not undertake an analysis?

M1-SEC-3

[M1] As part of CA Energy’s review and analysis of Hydro Ottawa’s proposed rate framework, did CA Energy review any other OEB Custom IR decisions and/or approved settlements to determine if the Hydro Ottawa proposal is or is not consistent? If so, please provide details and analysis.

M1-SEC-4

[M1] Please provide CA Energy’s views on the comparative risk of Hydro Ottawa’s proposed rate framework in this Application as compared to the approved framework in its previous application (EB-2019-0261).

M1-SEC-5

[M1, p.9, p.40] Please provide CA Energy’s views on the appropriateness of using the existing stretch factor values (i.e. 0-0.6%), which were designed to apply on a total rates/revenue requirement basis, to just OM&A, which does not include any embedded costs where incremental savings cannot be achieved (i.e. historic in-service already embedded in rate base).

M1-SEC-6

[M1, p.9, p.40] With respect to the Hydro Ottawa proposed OM&A growth factor:

- a. CA Energy has recommended that the Hydro Ottawa growth factor be set to equal a revenue-weighted average forecasted growth rate of customers and capacity. Aside from the approach

being better than that proposed by Hydro Ottawa, please explain why there should be any weighting between the two growth rates, as opposed to them being additive.

- b. Please provide CA Energy's views on how the growth factor should account for the specific elasticity of costs growth arising from change in. a) number of customers, and b) peak demand.
- c. Please provide any analysis CA Energy has undertaken related to Hydro Ottawa, or electricity distributors more generally, on the specific elasticity of costs growth arising from change in, a) number of customers, and b) peak demand.

M1-SEC-7

[M1. p. 23] With respect to the various variance accounts set out in Table 3:

- a. Please provide in a table that shows for each account listed in Table 3, its proposed recommendation if the account should be approved, approved with modifications (i.e. scope, symmetrical/asymmetrical) or rejected.
- b. Please provide CA Energy's views with the potential use of a deadband (either symmetrical or asymmetrical) for some or all of the accounts listed in Table 3.

Respectfully, submitted on behalf of the School Energy Coalition, this October 21st, 2025.

Mark Rubenstein
Counsel for the School Energy Coalition