

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, C.S.O. 1998, c.15, Schedule B, as amended (the “OEB Act”);

AND IN THE MATTER OF an Application by Entegrus Powerlines Inc. (“Entegrus”) under Section 78 of the OEB Act to the Ontario Energy Board for an Order or Orders approving or fixing just and reasonable rates and other service charges for the distribution of electricity as of May 1, 2026.

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

1-SEC-1

[Exhibit 1, Attachment 1-B Business Plan]

- a. Please provide all materials provided to the Entegrus Board of Directors regarding the proposed 2026 Cost of Service rate application (“Application”), that are not included in the Application.
- b. Please explain any material differences between the financials shown in the Business Plan for the test year and the Application.
- c. Please confirm that Entegrus’ forecasted 2025 Return on Equity (“ROE”) for the regulated business is 5.4%. If not confirmed, please provide an update.

1-SEC-2

[Exhibit 1, Chapter 2, Appendices]

- a. How many months of actuals are included in the Bridge Year Data?
- b. Please update the Bridge Year Data to include the most up-to-date actuals available and update the 2026 Forecast if required for Appendices 2-AA, 2-AB, 2-BA, 2-JA, 2-JB, 2-JC and 2-K.
- c. Please provide actuals for 2023 and 2024 to the same date as provided in part b.

1-SEC-3

[Exhibit 1, p.91] Entegrus has provided savings as a result of the merger.

- a. Please provide any productivity and efficiency measures not associated with the merger for the historical period since the last cost of service applications.
- b. Please explain the methodology used to determine any savings, quantify the savings and provide supporting calculations.
- c. Please provide details of all productivity and efficiency measures Entegrus is planning to undertake over the next five years. Please quantify the forecasted savings and explain how they were calculated.

1-SEC-4

[Exhibit 1] Please provide copies of all benchmarking studies, reports, and analyses that Entegrus has undertaken or participated in since the filing of its last rebasing applications, that are not already included in the Application.

2-SEC-5

[Exhibit 2, p.5; Appendix 2-BA] Entegrus states that ‘EPI’s capital expenditures are equivalent to in-service additions’; however, Appendix 2-BA shows changes in construction work in progress (“CWIP”) which would indicate this is not the case.

- a. Please explain the \$1,120,516 (Cell E925) addition to CWIP in 2024, which appears to be scheduled to go into service in 2025 (Cell F989).
- b. Please explain the \$550,000 (Cell E989) addition to CWIP in 2025, which appears to be scheduled to go into service in 2026 (Cell F1053).
- c. Please explain the \$550,000 (Cell E1053) addition to CWIP in 2026. When is this asset scheduled to go into service?
- d. Please explain the entries shown for accumulated depreciation for CWIP, e.g. in Cells K540, J604, J668 and K668.

2-SEC-6

[Exhibit 2; Appendix 2-AA]

- a. The average percentage contributed capital from 2016 to 2025 is 45% of gross System Access capital. Please explain why for the forecast period the average contributed capital has dropped to 38%.
- b. Please break out the forecasted contributed capital by the projects in System Access: Customer Conns: Commercial & Industrial, Customer Conns: Residential & Subdivisions, Engineering Support Capital, Miscellaneous System Access and Third-Party Attachments.

2-SEC-7

[Exhibit 2, Table 2-18] Please provide an update on the status of the capital work forecasted to be done in 2025.

2-SEC-8

[Exhibit 2, Table 2-26; Appendix 2-D] Please provide details of how Entegrus determined the OM&A allocated to capital for 2026.

2-SEC-9

[Exhibit 2, Attachment 2-C Distribution System Plan (“DSP”) (1of6), p.35]

- a. What is Entegrus’ estimate of the potential load of the St Thomas Volkswagen electric battery production facility?
- b. Has Entegrus made any adjustments to its capital plan or load forecast to account for this load?

2-SEC-10

[Exhibit 2, DSP (1of6), p.76] Is Entegrus proactively upgrading transformers to 100 kVA, or is this done only upon replacement for other reasons?

2-SEC-11

[Exhibit 2, DSP (1of6), Tables 5-22 to 5-25; Appendix 2-AB]

- a. Please explain the basis for numbers shown for 2025 Plan and for 2025 Forecast in the Tables 5-22 to 5-25.
- b. Please explain the variance between the numbers in Tables 5-22 to 5-25 and the 2025 Actual and 2025 Plan the numbers shown in Appendix 2-AB.

2-SEC-12

[Exhibit 2, DSP (1of6), Table 4-1 and Tables 5-27 to 5-30] The listed tables show a priority ranking for each project for the five years of the DSP.

- a. Please provide the details on how these rankings were determined, i.e. showing the scoring for each project by objective in Table 4-1.
- b. Please provide a priority ranking for each of the projects in 2026 and show how the rankings were determined.
- c. Were there any other projects planned for 2026 that were deferred based on the priority ranking? If so, please explain.

2-SEC-13

[Exhibit 2, DSP (2of6) Attachment A 2021-2025 DSP, Attachment C, Asset Condition Assessment (“ACA”) 2021 Table 0-2 and DSP (3of6) Attachment B, ACA 2024, Table 0-2]

- a. Please explain the decrease in average HI from 2021 to 2024 for steel, concrete poles and underground primary cables.
- b. Please confirm that all “Pole-Tran” style transformers in the Pole-Trans and Platform Transformers class were replaced with pad-mounted units by the end of 2024.

2-SEC-14

[Exhibit 2, DSP (6of6), Attachment J Material Investment Narrative, 09. Metering Renewal, p.68]

- a. Entegrus states that it “had applied for a 6-year extension” for the approximately 5,000 meters that “tested poorly during the 2nd seal period sampling in 2024”. Please provide an update to the status of this request.

- b. Will Entegrus be able to ask for an extension for any of the approximately 39,700 meters seal that will expire during the 2026-2030 period?
- c. Please provide the number of meters replaced each year 2021-2025 and forecasted to be replaced each year 2026-2030.
- d. When is Entegrus planning to deploy AMI 2.0?

2-SEC-15

[Exhibit 2, DSP (6of6), Attachment J Material Investment Narrative, 11. Operations Support Capital, p.84] Please explain which “large-scale investments in the distribution system” in 2026 this budget will be spent on.

2-SEC-16

[Exhibit 2, DSP (6of6), Attachment J Material Investment Narrative, 12. Pole Replacements] Please provide the number of poles replaced in each year 2021-2024 and forecasted to replace in each year 2025-2030. Please break the number down into emergency replacement, planned replacement, replacement due to voltage conversion, etc.

2-SEC-17

[Exhibit 2, DSP (6of6), Attachment J Material Investment Narrative, 13. Transformer Replacement] Please provide the number of transformers replaced in each year 2021-2024 and forecasted to replace in each year 2025-2030. Please break the number down into emergency replacement, planned replacement, replacement due to voltage conversion, etc.

2-SEC-18

[Exhibit 2, DSP (6of6), Attachment J Material Investment Narrative, 14. Voltage Conversion]

- a. Please provide a listing of the 4 kV stations that will be converted, including the Health Index for each station’s assets.
- b. Please indicate the scheduled year for conversion of each station.

2-SEC-19

[Exhibit 2, DSP (6of6), Attachment J Material Investment Narrative, 16. System Modernization and Planning] Please indicate which specific projects will be done under this budget.

2-SEC-20

[Exhibit 2, DSP (6of6), Attachment J Material Investment Narrative, 17. Capacity Enhancements] Please indicate which specific projects will be done under this budget.

2-SEC-21

[Exhibit 2, Attachment 2-C DSP (6of6), Attachment J Material Investment Narrative, 20. IT Software] Please show the budget for each of the two specified projects planned for 2026.

2-SEC-22

[Exhibit 2, Attachment 2-C DSP (6of6), Attachment J Material Investment Narrative, 22. Rolling Stock]

- a. Please provide details of how Entegrus determines the Asset Replacement Criteria and how it is met.
- b. Please provide a full listing of Entegrus' fleet, including age, condition and year of planned replacement.
- c. Please break out the forecasted budget by vehicle to be replaced.
- d. Please provide the status of the vehicles scheduled for 2026, e.g. have they been ordered, when is the expected delivery date?

2-SEC-23

[Exhibit 2, DSP]

- a. Under which program(s) does Entegrus replace overhead and underground conductors?
- b. Please provide the number of km of overhead and underground conductors replaced in 2021-2024 and forecasted to be replaced in years 2025-2030.

3-SEC-24

[Exhibit 3, p.10, Appendix 2-IB]

- a. Please provide actual year-to-date data for billing determinants in 2025.
- b. Please update the load forecast to include 2025 actuals to date and update Appendix 2-IB.

3-SEC-25

[Exhibit 3, Table 3-12] Has Entegrus done any analysis to determine that the weather sensitivity per rate class has not changed since 2015? If so, please provide results. If not, please explain why Entegrus thinks the values from 2015 still apply.

3-SEC-26

[Exhibit 3, Table 3-14] Entegrus states that "For the Large Use rate class, the 2022-2024 average was used to appropriately reflect the current customer/demand mix of this rate class in the Test Year." Please explain what changed in the customer/demand mix in 2022 to prompt this decision.

3-SEC-27

[Exhibit 3, Tables 3-16 and 3-24]

- a. Please explain the negative variance in customer numbers in the GS > 50 kW to 4,999 kW class between 2016 approved and actuals.
- b. Please explain the significant decrease in customer numbers in the GS > 50 kW to 4,999 kW class from 2016 to 2024.
- c. Please break down the change in customer numbers in this class between customer reclassifications and new or leaving customers.

4-SEC-28

[Exhibit 4, Tables 4-4 and 4-7, Appendix 2-JB and Exhibit 1, Table 1-32, p. 10]

- a. Please explain how Entegrus determined the \$2,124,397 in Inflation on Non-Labour Items shown in Table 4-7 and Appendix 2-JB, based on the information in Table 4-4.

- b. Please explain how Entegrus determined the Merger Synergies of (\$1,817,597) shown in Table 4-7 and Appendix 2-JB.
- c. Please reconcile the Merger Synergies of (\$1,817,598) as shown in Table 4-7 and Appendix 2-JB and Merger Transaction Costs of \$107,325 with the Operating Costs and Savings shown in Table 1-32 of Exhibit 1.
- d. If fewer employees were required due to the merger, would the resulting reduction in compensation be captured in Change in Operating Portion of Salaries, Wages, and Benefits or Merger Synergies?
- e. Entegrus has added 25 incremental Full-Time Equivalents (“FTEs”) since the 2016 OEB Approved Proxy year. Please break out this number into FTEs reduced as a result of the merger and new FTEs added.

4-SEC-29

[Exhibit 4, Table 4-22] Table 4-22 shows bad debt has been increasing since 2024 despite the increase in LEAP funding.

- a. Please provide details on how the 2026 forecast for bad debt was determined.
- b. Please comment on why the increase in LEAP funding has not helped to reduce bad debt expense?

4-SEC-30

[Exhibit 4, p.50] Please provide an update on the project to identify new work management and service order platforms.

4-SEC-31

[Exhibit 4, Table 4-33]

- a. Please provide the number of locates and cost per locate for each year.
- b. Is all locate work done in-house? If not, please provide a breakdown between in-house and contract work.

4-SEC-32

[Exhibit 4, p.72, Table 4-45 and Appendix 2-K]

- a. Please break out compensation in Appendix 2-K to show incentive pay.
- b. Please provide the details on how incentive pay is determined.
- c. Entegrus states that it “ensures that all compensation is market competitive, which is defined as +/- 10% of the P50 value for each position”. Please demonstrate that this is correct and provide any analysis or studies that have been done.
- d. Has Entegrus included a provision for vacancies in its 2026 FTE forecast? If so, what percentage?

4-SEC-33

[Exhibit 4, Table 4-64]

- a. Please provide an update on spending to the date of filing the Application in the following categories: legal, consultants and incremental staff.
- b. Please also provide the spending to date for the categories in part a.
- c. Please provide details of the consultants hired for this Application.

4-SEC-34

[Exhibit 4, Appendix 2-JC] Please provide details of the \$1,013,893 increase in 2025 over 2024 and the \$332,488 increase in 2026 over 2025 for the Administrative & Human Resource Expenses line.

5-SEC-35

[Exhibit 5, p.7] Please update the Return on Equity and the Short-Term Debt Rate based on those issued by the OEB on Cost of Capital Parameters (EB-2025-0303) dated October 31, 2025.

6-SEC-36

[Exhibit 6, p.21; Appendix 2-H]

- a. For Account 4375, Entegrus has noted that revenues have decreased due to the end of providing management services to another LDC. Please indicate where the decrease in related expenses to provide the management services is included.
- b. Please update Appendix 2-H to include 2025 actuals to-date and update the 2026 forecast as required.

7-SEC-37

[Exhibit 7, Tables 7-2, 7-3 and 7-4] Please provide the underlying data behind the calculations of the weighting factors in the three tables.

8-SEC-38

[Exhibit 8, Table 8-4] Please show how Entegrus determined the blended fixed charges shown in Table 8-4.

8-SEC-39

[Exhibit 8, p.22] What amount has been included in contributed capital to replace the two charges detailed on page 22.

8-SEC-40

[Exhibit 8, p.33] The application states that “there are no former Entegrus-STT rate zone customers that will be migrating to the ...Unmetered Scattered Load rate classes which will now apply in this service territory”.

- a. Is every load in the STT rate zone metered? If not, then how are these loads billed?
- b. If every load is metered, has Entegrus examined what the difference in the bill would be for loads that normally would be unmetered, e.g. traffic lights or telecom connections if moved to the Unmetered Scattered Load rate class?

9-SEC-41

[Exhibit 9, Table 9-1, p.12]

- a. Please confirm that Entegrus has maintained separate Deferral and Variance Accounts (“DVA”) for each rate zone since the merger.
- b. If confirmed, please break out Table 9-1 into the two rate zones.
- c. If not confirmed, when did Entegrus start recording DVA amounts on a consolidated basis?
- d. Please calculate separate DVA rate riders for each rate zone based on the information in part b.
- e. Please explain what Entegrus means with the statement “consistent with the methodology approved in EPI’s 2016 COS (EB-2015-0061), EPI also seeks to dispose of all Group 1 and Group 2 deferral variances on a harmonized basis” stated on page 12.

9-SEC-42

[Exhibit 9, Table 9-21] Please provide evidence that the amount requested to be disposed of for account 1508 Other Regulatory Assets, Getting Ontario Connected Act (“GOCA”) is directly a result of GOCA.

Respectfully, submitted on behalf of the School Energy Coalition on November 7, 2025.

Jane Scott
Consultant for the School Energy Coalition