



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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December 19, 2025
Our File: EB20250024

Attn: Ritchie Murray, Acting Registrar

Dear Mr. Murray:

Re: EB-2025-0024 – Lakeland Power Distribution Inc. Z-Factor – SEC Interrogatories

We are counsel to the School Energy Coalition (“SEC”). 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 Lakeland Power Distribution Ltd. 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

SEC-1

[p.33] Please provide for each rate class, separate distribution bill impacts for each of the two z-factor events.

SEC-2

[Appendix Z-1, p.5, 11] The Applicant states: “The transformer is currently expected to be fully repaired and returned to operations by Fall 2026 – therefore an update to this Z-factor with additional costs is expected to be filed in 2026.”

- a. Please provide further details regarding this expected update? Is the Applicant proposing a subsequent Z-factor claim in 2026?
- b. Please provide a revised version of Table 1 that shows forecast of Z-factor costs through the end of 2026.

SEC-3

[Appendix Z-1, p.5] Please provide copies of all reports provided to the Applicant, whether formally (e.g. reports or other written communications) or informally (e.g. emails or notes on phone or in-person conversations), by KPC Power regarding the failure of the Centennial MS.

SEC-4

[Appendix Z-1, p.6] Is the Applicant’s position that *but for* the lightning storm the Centennial MS would not have failed on that day, or that it would likely not have failed before or near its expected useful life? Please provide evidence to support your answer.

SEC-5

[Appendix Z-1, p.5-6] Please confirm that the Applicant has no direct evidence that the failure of the Centennial MS occurred as result of the lightning storm. For example, no evidence that the transformer was hit by lightning or any other information of that type.

SEC-6

[Appendix Z-1, p.9-10] With respect to the transformer rental:

- a. When did Bracebridge Generation purchase the temporary transformer?
- b. Please confirm that Bracebridge Generation purchased a temporary transformer for \$375,000.
- c. Please explain how the monthly rental price with Bracebridge Generation was determined.
- d. Please provide the expected remaining useful life of the temporary transformer.
- e. What is the total cost that Lakeland expects to pay Bracebridge Generation for use of the transformer?
- f. If the Applicant had purchased the temporary transformer, what would the first full-year costs, on a revenue requirement basis? Please provide the calculation.
- g. Please explain how the Applicant believes the transformer rental complies with the transfer pricing provisions of the OEB's *Affiliate Relationship Code For Electricity Distributors and Transmitters*.
- h. Please provide the Bracebridge Generation's fully-allocated cost to provide the transformer rental. Please provide all assumptions and calculations.

SEC-7

[Appendix Z-2, p.11] Please detail how internal incremental labour costs were calculated.

SEC-8

[Appendix Z-2, p.11-12] With respect to the capital expenditures incurred:

- a. Please provide a breakdown by asset type and their quantity.
- b. For each asset type, please provide a breakdown of the number of assets replaced in poor or very poor condition, and the total number each year between 2024 and its next forecast rebasing application.

Respectfully, submitted on behalf of the School Energy Coalition this December 19th, 2025.

Mark Rubenstein
Counsel for the School Energy Coalition