EB-2026-0029

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an application by Canadian Niagara Power Inc. pursuant to section 78 of the Act for an order or orders approving or fixing just and reasonable distribution rates effective January 1, 2027 and related matters

INTERROGATORIES

FROM THE

SCHOOL ENERGY COALITION

1-SEC-1
[Exhibit 1, p. 37] Please confirm that the reorganization of Fortis corporate holdings approved in EB-2026-0122 is not expected to result, over the rate term, in any material changes to the source or amounts of corporate allocations or shared services affecting the Applicant.

1-SEC-2
[Exhibit 1, p. 38] Please describe all transactions (if any) involving the provision of goods or services, or the payment of monies, current or planned, between the Applicant and Westario Power Inc., Rideau St. Lawrence Holdings Inc., or Grimsby Power Inc. (including their respective affiliates).

1-SEC-3
[Exhibit 1, p. 38] Please provide the most recent (audited or unaudited) financial statements of FortisOntario Inc.

2-SEC-4
[DSP, Appendix K] Please confirm that a decision has been made to carry out a brownfield migration to SAP S/4HANA in 2029. Please advise whether that decision includes an expectation that the Applicant will seek ICM funding at that time. If that decision has not yet been made, please advise the most recent status of that ERP/CIS replacement process.

4-SEC-5
[Exhibit 4, p. 6] Please describe any shift in strategy or priorities that has caused the Administrative and General category to increase 41% from 2022 to 2027, while Operations and Maintenance categories are increasing by 27% from 2022 to 2027.

4-SEC-6

[Exhibit 4, p. 47] Please disaggregate the Appendix 2-K table into three separate tables (including FTEs and compensation, and in the same format), so that the net totals from the three tables will equal to the totals in the combined Appendix 2-K presented:

a) FTEs and all compensation of Employees directly employed by the Applicant.
b) FTEs and all compensation allocated, shared or charged from affiliates of the Applicant.
c) FTEs and all compensation allocated, shared or charged to affiliates of the Applicant.

4-SEC-7

[Exhibit 4, p. 60] Please confirm that, if the Expansion of OMERS eligibility is included, the figure for 2027 in Table 4-13 would be $425,352. If not confirmed, please restate the table with the correct number, and advise its derivation.

5-SEC-8

[Exhibit 5, p. 10] Please advise what steps the Applicant or its parent company took to seek alternative funding for the new $50M debt at a rate less than 4.73%. Please advise what external financing, if any, FortisOntario is expecting to put in place to support and/or fund the loan to the Applicant of $50M, and the terms of that financing.

Respectfully submitted on behalf of the School Energy Coalition this August 5, 2026.

Jay Shepherd
Counsel for the School Energy Coalition