



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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October 13, 2017
Our File: EB20170069

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2017-0069 – Oshawa PUC Networks Inc. – SEC Interrogatories

We are counsel to the School Energy Coalition (“SEC”). Pursuant to Procedural Order No. 1, please find SEC’s interrogatories.

Yours very truly,
Shepherd Rubenstein P.C.

Original signed by

Mark Rubenstein

cc: Wayne McNally, SEC (by email)
Applicant and interested parties (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 Oshawa PUC Networks Inc. for an Order approving final rates for the distribution of electricity for the years 2018 and 2019.

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

SEC-1

[Ex A, p.12] The Applicant states that it has based its customer growth forecast on discussions with the City of Oshawa. Please provide copies of any notes, emails, meeting minutes or similar documents from those discussions.

SEC-2

[Exhibit A, p.16-17] With respect to the Enfield TS and related assets:

- a. Please provide the forecast month the Applicant expected Enfield TS to be in-service.
- b. [EB-2014-0101, Tech Conference Transcript p.124-125] SEC understood from the evidence in EB-2014-0101 that the Applicant required Enfield TS to be in-service prior to the MS9 substation. The pre-filed evidence in this proceeding is that MS9 substation is expected to be in-service in 2018, while Enfield TS in-serve date is delayed until 2019. Please reconcile.
- c. Please provide details and a breakdown regarding the additional costs \$6.5M. Please explain why the amount was not forecasted at the time of the Custom IR application.

SEC-3

[EB-2014-0101, Ex. 2-A, p.113] With respect to the MS9 Substation:

- a. Please provide the forecast month the substation is expected to be in-service.
- b. The evidence in EB-2014-0101 was that the MS9 substation construction was to be undertaken pursuant to “RFP/RFQ for a turn-key design, construction and commissioning” contract. Please provide an update on the status of the RFP/RFQ process and if a proponent has been selected, please provide details regarding the contractor and the amount of the contract.

SEC-4

[Exhibit A, p.17] Please provide a detailed breakdown of the difference in plant forecasted in 2018 and 2019 at the time of the Custom IR application, and the updated amount.

SEC-5

[Exhibit A, p.17] Please provide the basis for the statement, “[h]owever, based on the City and Regional planning and the completion of infrastructure for the 407 ETR extension, OPUCN expects the total planned capital for the third-party requested plant relocations for the five years to be spent.”

Respectfully submitted on behalf of the School Energy Coalition this October 13th, 2017

Original signed by

Mark Rubenstein
Counsel for the School Energy
Coalition