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August 24, 2010

VIA MAIL and E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli:

Re: Vulnerable Energy Consumers Coalition (VECC)
EB-2010-0228
Hydro One Networks Inc. – New Rates and Fees Related to Distribution Generation Projects

Please find enclosed the interrogatories of the Vulnerable Energy Consumers Coalition (VECC) in the above-noted proceeding.

Thank you.

Yours truly,

Michael Buonaguro
Counsel for VECC
Encl.

cc: Ms. Anne-Marie Reilly

HYDRO ONE NETWORKS INC.
APPLICATION FOR NEW RATES AND MISCELLANEOUS FEES
REALTED TO DISTRIBUTION GENERATINO PROJECTS
EB-2010-0228

VECC INTERROGATORIES

QUESTION #1

Reference: Exhibit B/Tab 1/Schedule 1, pages 1 - 4

Preamble: The Board Decision from EB-2003-0249 approved a pole rental rate of $22.35 per pole per year.

a) Please indicate what year's cost data was used in the Board's Decision.

b) Please provide the basis for the current joint use rate of $28.61. In doing so, please also fully explain the derivation of the $57.22 value referenced at Exhibit B, Tab 2, Schedule 1, page 2 and Table 3.

c) The OEB Decision makes no reference to a 28.1% space allocation factor. Please fully explain what the 28.1% represents and how it was determined.

d) Please explain the derivation of the 29.1% factor used in the Board's Decision and referenced on page 5.

QUESTION #2

Reference: Exhibit B/Tab 1/Schedule 1, pages 5-7

a) Page 6 makes reference to shared space between the LDC and Hydro One Distribution. Please explain why these parties are sharing space as opposed to it being a generator and a LDC that are sharing space.

b) The 29.1% factor used by the OEB was based on a 40' pole and 2.5 attachments. However, in the current Exhibit Hydro One has assumed a 50' pole and two attachments along with the LDC/generator. Please reconcile the use of 29.1% in the Hydro One calculations.

c) If the 56.2% shared space factor is based on a 50' pole, why won't this factor change as the size of the pole changes. Presumably, with larger poles to accommodate generators the allocation factor applicable to communications/street lights will decline.

d) Do the proposed rates account for the additional maintenance costs and productivity losses discussed at lines 6-12 or do they just account for the fact higher poles are required when generators also seek to connect and generators required a larger portion?

QUESTION #3

Reference: Exhibit B/Tab 1/Schedule 1, page 9

a) Why is $57.22 the appropriate cost base to use for the rates to be implemented January 1, 1010? Is $57.22 based on 2010 costs?

QUESTION #4

Reference: Exhibit C/Tab 1/Schedule 1, page 2

a) Please provide the basis for the proposed $3,000 charge for Net Metering projects and Capacity Allocation Exempt projects.

QUESTION #5

Reference: Exhibit C/Tab 1/Schedule 1, pages 3-4

a) Prior to the EB-2009-0096 Decision, what was the CIA rate charged for small and mid-sized projects?

b) What are the distinguishing features between these projects and the Capacity Allocation Exempt projects such that the latter warrant the lower charge?

c) Why is August 31, 2010 the appropriate date on which to start charging the “full cost”?