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August 24, 2010

Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street 27th floor Toronto, ON M4P 1E4

Dear Ms Walli

Hydro One Networks Inc. ("Hydro One")Application for Approval of New Rates and Fees Related to Distribution Generation ProjectsBoard File No.:EB-2010-0228Our File No.:339583-000079

Please find attached the Interrogatories of our client, Canadian Manufacturers & Exporters ("CME"). Paper copies are being sent as required.

Yours very truly,

Peter C.P. Thompson, Q.C.

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- enclosure
- c. Anne-Marie Reilly (Hydro One) EB-2009-0228 Intervenors Paul Clipsham (CME)

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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 Hydro One Networks Inc. for an order approving joint use rates for generator use of distribution poles and fees for Connection Impact Assessments.

INTERROGATORIES OF CANADIAN MANUFACTURERS & EXPORTERS ("CME") FOR HYDRO ONE NETWORKS INC. ("HYDRO ONE")

<u>Reference</u>: Exhibit B, Tab 1, Schedule 1

- 1. The evidence at Exhibit B, Tab 1, Schedule 1, page 2, line 20 indicates that the rate currently being charged to generators for joint use of a 50-ft. pole is \$28.61 per pole. Please explain how this current charge relates to the annual pole rental charge of \$22.35 charged for the joint use of a pole for telecommunications purposes, being an amount shown in line K of Table 1 in the evidence at Exhibit B, Tab 1, Schedule 1, page 4. Is the calculation of the current \$28.61 charged to generators linked to the space allocation factor of 28.1% for LDC attachments, compared to the 21.9% allocation factor applicable to telecommunications attachments?
- 2. Please explain how the proposed charges of \$38.15 for a 60-ft.pole, \$45.78 for an 80-ft. pole, and \$49.21 for a 100-ft. pole have been derived from the data provided in Table 2 and either the annual pole rental of \$22.35 charged for telecommunications attachments, or the \$28.61 currently charged for LDC attachments to 50-ft. poles.
- 3. In a format comparable to Table 1 at Exhibit B, Tab 1, Schedule 1, page 4, lines A to H inclusive, please provide the line items and Total Direct and Total Indirect Costs for pole lengths ranging between 55-ft. and 100-ft.
- 4. Please provide details of the variance account described at page 10 that Hydro One proposes to use to track joint use revenues in excess of the amount currently charged of \$28.61 for a 50-ft. pole with such revenues to be used to offset future rates for its distribution customers. For example, will distribution customers receive a credit towards future rates of \$9.54 for every generator that chooses to attach to a 60-ft. pole? (the proposed charge of \$38.15 for a 60-ft. pole exceeds current charge of \$28.61 for a 50-ft. pole by \$9.54 per pole).

5. Will the variance account apply in years beyond December 31, 2011?

Reference: Exhibit B, Tab 2, Schedule 1

- 6. Will the annual COLA adjustment being proposed in Exhibit B, Tab 2, Schedule 1, be recorded in the variance account as a credit to future distribution rates?
- 7. What are the implications for distribution customers of Hydro One's request for varying fees for connection impacts assessments described in Exhibit C, Tab 1, Schedule 1, pages 1 to 4? In particular, what incremental revenue, if any, is likely to result from this proposal during the years 2010 and 2011, and is Hydro One proposing to track these incremental revenues in a variance account and use them to off-set future rates for its distribution customers?

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