Filed: September 23, 2010

EB-2010-0002 Exhibit J2.3 Page 1 of 1

#### **UNDERTAKING** 1 2 **Undertaking** 3 4 TO PROVIDE CORRECTION TO I-4-29. 5 6 **Response** 7 8 Please see attached an updated version of I-4-29. 9 10 The correction to the OM&A Table has been made as per the Undertaking. Upon a 11 further review, a minor correction has been made to the Capital Table for the 2012 12 Sustaining category to reflect an omission of the \$10.0M minimum level for 13 Transmission Lines Re-Investment. 14 15 Please note, the minimum levels are established at the beginning of the business planning 16 process and are not reset. 17

Filed: August 16, 2010 EB-2010-0002 Exhibit I Tab 4 Schedule 29 Page 1 of 3

# Vulnerable Energy Consumers Coalition (VECC) INTERROGATORY #29 List 1

# **Interrogatory**

**Issues:** 3.1 and 4.2

**References:** i) EB-2008-0272, Exhibit J2.7

a) Please provide an updated version of Exhibit J2.7 that sets out the minimum and proposed OM&A and Capital Spending for 2011 and 2012 as established by Hydro One Networks' Investment Prioritization Process.

ii) Exhibit A, Tab 12, Schedule 5, pages 4-8

## Response

a) By definition, the Business Plan represents the minimum aggregate set of investments as determined through the investment planning process outlined in Exhibit A, Tab 12, Schedule 5.

The investment planning process requires a number of alternatives for each category of investment and the lowest expenditure level is referred to as the Minimum and upper levels are generally a level 2 or 3. In most cases, with the exception of demand work, the level of investment that mitigates risks to an acceptable degree is between the minimum and upper level. The plan in this submission has gone through the prioritization process and represents the levels of investment to manage risks at acceptable levels over the test years.

Hydro One applies the risk based prioritization process to establish a uniform view of investments, recognizing that the investments differ in many ways, e.g., protection and controls as compared to vegetation management. In order to arrive at this common understanding of risk, the process requires a number of alternatives for each investment category to derive the appropriate level of investment. The minimum in most cases is used to facilitate the process, or provide a lower bound in order to zero in on the acceptable level from a perspective of risk mitigation. In most cases the process requires the selection of an extreme lower bound that would plan for a medium likelihood of severe occurrences, such as just recently occurred at Manby TS, refer to Exhibit I, Tab 1, Schedule12. Hydro One would never plan for such events, but that could be the consequence of selecting a minimum level without a detailed understanding of the prioritization process and the possible outcome. Furthermore, if one were to reduce a number of investments to the minimum level, the likelihood of a severe event would increase.

Updated: September 23, 2010 EB-2010-0002 Exhibit I Tab 4 Schedule 29 Page 2 of 3

As well, the minimum levels do not provide for long term sustainability of the assets. For example, in a number of cases reliability would drift lower and at some point in the future, investments would need to increase to renew the condition and performance of these assets.

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Considering these aspects, using the minimum as a point of reference is discouraged, as it truly does not represent a plan that is in the best interest of the rate payers and the province.

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### HYDRO ONE NETWORKS INC. TRANSMISSION OM&A 2011/2012 PLAN

Part				2011			2012			
Stations				Minimum			Minimum			
Stations   Land Assessment and Remediation   1.1   0.9   0.2   1.1   0.9   0.2			Filed	Level	Variance	Filed	Level	Variance		
Land Assessment and Remediation	Sustaining									
Environmental Management										
Power Equipment		Land Assessment and Remediation	1.1	0.9	0.2	1.1	0.9	0.2		
Protection, Control, Montioring, Metering and Telecommunications		Environmental Management	14.0	10.5	3.5	15.4	11.4	4.0		
Ancillary Systems Maintenance   15.8   16.1   -0.3   16.6   17.7   -1.1   Infrastructure Maintenance   27.9   23.9   4.0   28.7   24.9   3.9   27.0   28.7   24.9   3.9   27.0   28.7   24.9   3.9   28.7   24.9   3.9   28.7   28.0   28.7   28.0   28.7   28.0   28.0   28.7   28.0		Power Equipment	67.4	62.3	5.1	67.7	65.9	1.9		
Ancillary Systems Maintenance		Protection, Control, Monitoring, Metering								
Infrastructure Maintenance		and Telecommunications								
Total Stations										
Lines										
Vegetation Management   27.5   24.8   2.7   28.3   25.4   3.0		Total Stations	170.7	157.4	13.3	176.3	165.8	10.5		
Overhead Lines Programs   20.2   18.0   2.2   23.0   16.3   6.8	Lines									
Underground Cable Program   3.8   2.7   1.1   4.0   2.8   1.2   Total Lines   51.4   45.5   5.9   55.4   44.4   11.0   Engineering and Environmental Support   11.0   9.2   1.8   11.8   9.7   2.1   1.5										
Total Lines   S1.4   45.5   S.9   S5.4   44.4   11.0										
Engineering and Environmental Support   11.0   9.2   1.8   11.8   9.7   2.1										
Development   Research and Development   Fase arch and D		Total Lines	51.4	45.5	5.9	55.4	44.4	11.0		
Development   Research and Development   6.4   6.3   0.1   6.6   6.5   0.1		Engineering and Environmental Support	11.0	9.2	1.8	11.8	9.7	2.1		
Research and Development   6.4   6.3   0.1   6.6   6.5   0.1     Standards Development   7.8   3.9   3.9   8.3   4.2   4.1     IPSP Development Projects   35.7   33.7   2.0   46.7   41.6   5.1     Smart Grid   4.0   4.0   0.0   4.0   4.0   0.0     Total Development   53.9   47.9   5.9   65.7   56.4   9.3      Operations	Total Sustaining		233.0	212.0	21.0	243.5	220.0	23.6		
Research and Development   6.4   6.3   0.1   6.6   6.5   0.1     Standards Development   7.8   3.9   3.9   8.3   4.2   4.1     IPSP Development Projects   35.7   33.7   2.0   46.7   41.6   5.1     Smart Grid   4.0   4.0   0.0   4.0   4.0   0.0     Total Development   53.9   47.9   5.9   65.7   56.4   9.3      Operations										
Standards Development   7.8   3.9   3.9   8.3   4.2   4.1     IPSP Development Projects   35.7   33.7   2.0   46.7   41.6   5.1     Smart Grid   4.0   4.0   0.0   4.0   4.0   0.0     Total Development   53.9   47.9   5.9   65.7   56.4   9.3      Operations   Support   24.8   21.2   3.6   25.9   22.2   3.8     Environmental, Health & Safety   3.5   2.8   0.7   4.0   3.3   0.7    Total Operations   66.3   62.1   4.2   68.2   63.7   4.5      TOTAL Sustaining, Development & Operations   353.2   322.0   31.1   377.4   340.0   37.4      Shared Services and Other Costs   34.6   34.6   0.0   34.9   34.9   0.0     Common Corporate Functions & Services costs   100.8   100.8   0.0   98.3   98.3   0.0     Common Corporate Functions & Services costs   1.1   1.1   0.0   0.6   0.6   0.0     Information Technology   58.2   52.8   5.4   58.8   54.2   4.7     Cost of Sales   14.9   14.9   0.0   8.5   8.5   0.0     Comerstone   -12.5   -12.5   0.0   -21.4   -21.4   0.0     Other   -184.6   -182.6   -2.0   -179.4   -174.3   -5.1     Total Shared Services and Other Costs   12.4   9.0   3.4   0.4   0.8   -0.4     Property Taxes & Rights Payments   70.8   70.8   0.0   72.2   72.2   0.0	Developme									
PSP Development Projects   35.7   33.7   2.0   46.7   41.6   5.1										
Smart Grid   4.0   4.0   0.0   4.0   4.0   0.0     Total Development   53.9   47.9   5.9   65.7   56.4   9.3     Operations										
Departions		, ,								
Operations           Operation Operation Support Operations Support Services and Other Costs         38.0 38.0 0.0 0.0 38.3 38.3 0.0 0.0 38.3 38.3	T-1-1 D-1-1									
Operation Operation Operations Support         38.0         38.0         0.0         38.3         38.3         0.0           Operations Support Environmental, Health & Safety         3.5         2.8         0.7         4.0         3.3         0.7           Total Operations         66.3         62.1         4.2         68.2         63.7         4.5           TOTAL Sustaining, Development & Operations         353.2         322.0         31.1         377.4         340.0         37.4           Shared Services and Other Costs           Asset Management costs         34.6         34.6         0.0         34.9         34.9         0.0           Common Corporate Functions & Services costs         100.8         100.8         0.0         98.3         98.3         0.0           Customer care         1.1         1.1         0.0         0.6         0.6         0.0           Information Technology         58.2         52.8         5.4         58.8         54.2         4.7           Cost of Sales         14.9         14.9         0.0         8.5         8.5         0.0           Cornerstone         -12.5         -12.5         0.0         -21.4         -21.4         0.0	i otai Deve	opment	53.9	47.9	5.9	65.7	56.4	9.3		
Operations Support	Operations	•								
Shared Services and Other Costs		Operation	38.0	38.0	0.0	38.3	38.3	0.0		
Total Operations   66.3   62.1   4.2   68.2   63.7   4.5		Operations Support	24.8	21.2	3.6	25.9	22.2	3.8		
Shared Services and Other Costs		Environmental, Health & Safety	3.5	2.8			3.3			
Shared Services and Other Costs         Asset Management costs       34.6       34.6       0.0       34.9       34.9       0.0         Common Corporate Functions & Services costs       100.8       100.8       0.0       98.3       98.3       0.0         Customer care       1.1       1.1       0.0       0.6       0.6       0.0         Information Technology       58.2       52.8       5.4       58.8       54.2       4.7         Cost of Sales       14.9       14.9       0.0       8.5       8.5       0.0         Cornerstone       -12.5       -12.5       0.0       -21.4       -21.4       0.0         Other       -184.6       -182.6       -2.0       -179.4       -174.3       -5.1         Total Shared Services and Other Costs       12.4       9.0       3.4       0.4       0.8       -0.4         Property Taxes & Rights Payments       70.8       70.8       0.0       72.2       72.2       0.0	Total Opera	ations	66.3	62.1	4.2	68.2	63.7	4.5		
Asset Management costs       34.6       34.6       0.0       34.9       34.9       0.0         Common Corporate Functions & Services costs       100.8       100.8       0.0       98.3       98.3       0.0         Customer care       1.1       1.1       0.0       0.6       0.6       0.0         Information Technology       58.2       52.8       5.4       58.8       54.2       4.7         Cost of Sales       14.9       14.9       0.0       8.5       8.5       0.0         Cornerstone       -12.5       -12.5       0.0       -21.4       -21.4       0.0         Other       -184.6       -182.6       -2.0       -179.4       -174.3       -5.1         Total Shared Services and Other Costs       12.4       9.0       3.4       0.4       0.8       -0.4         Property Taxes & Rights Payments       70.8       70.8       0.0       72.2       72.2       0.0	TOTAL Sustaining, Development & Operations		353.2	322.0	31.1	377.4	340.0	37.4		
Asset Management costs       34.6       34.6       0.0       34.9       34.9       0.0         Common Corporate Functions & Services costs       100.8       100.8       0.0       98.3       98.3       0.0         Customer care       1.1       1.1       0.0       0.6       0.6       0.0         Information Technology       58.2       52.8       5.4       58.8       54.2       4.7         Cost of Sales       14.9       14.9       0.0       8.5       8.5       0.0         Cornerstone       -12.5       -12.5       0.0       -21.4       -21.4       0.0         Other       -184.6       -182.6       -2.0       -179.4       -174.3       -5.1         Total Shared Services and Other Costs       12.4       9.0       3.4       0.4       0.8       -0.4         Property Taxes & Rights Payments       70.8       70.8       0.0       72.2       72.2       0.0										
Common Corporate Functions & Services costs         100.8         100.8         0.0         98.3         98.3         0.0           Customer care         1.1         1.1         0.0         0.6         0.6         0.0           Information Technology         58.2         52.8         5.4         58.8         54.2         4.7           Cost of Sales         14.9         14.9         0.0         8.5         8.5         0.0           Cornerstone         -12.5         -12.5         0.0         -21.4         -21.4         0.0           Other         -184.6         -182.6         -2.0         -179.4         -174.3         -5.1           Total Shared Services and Other Costs         12.4         9.0         3.4         0.4         0.8         -0.4           Property Taxes & Rights Payments         70.8         70.8         0.0         72.2         72.2         0.0	Shared Ser	vices and Other Costs								
Customer care         1.1         1.1         0.0         0.6         0.6         0.0           Information Technology         58.2         52.8         5.4         58.8         54.2         4.7           Cost of Sales         14.9         14.9         0.0         8.5         8.5         0.0           Cornerstone         -12.5         -12.5         0.0         -21.4         -21.4         0.0           Other         -184.6         -182.6         -2.0         -179.4         -174.3         -5.1           Total Shared Services and Other Costs         12.4         9.0         3.4         0.4         0.8         -0.4           Property Taxes & Rights Payments         70.8         70.8         0.0         72.2         72.2         0.0	Asset N	lanagement costs			0.0					
Information Technology   58.2   52.8   5.4   58.8   54.2   4.7		•	100.8							
Cost of Sales         14.9         14.9         0.0         8.5         8.5         0.0           Cornerstone         -12.5         -12.5         0.0         -21.4         -21.4         0.0           Other         -184.6         -182.6         -2.0         -179.4         -174.3         -5.1           Total Shared Services and Other Costs         12.4         9.0         3.4         0.4         0.8         -0.4           Property Taxes & Rights Payments         70.8         70.8         0.0         72.2         72.2         0.0										
Comerstone Other         -12.5 -184.6         -12.5 -182.6         0.0 -2.0         -21.4 -179.4         -21.4 -174.3         -5.1 -5.1           Total Shared Services and Other Costs         12.4         9.0         3.4         0.4         0.8         -0.4           Property Taxes & Rights Payments         70.8         70.8         0.0         72.2         72.2         0.0	0,									
Other Total Shared Services and Other Costs         -184.6         -182.6         -2.0         -179.4         -174.3         -5.1           Property Taxes & Rights Payments         70.8         70.8         0.0         72.2         72.2         0.0										
Total Shared Services and Other Costs         12.4         9.0         3.4         0.4         0.8         -0.4           Property Taxes & Rights Payments         70.8         70.8         0.0         72.2         72.2         0.0										
Property Taxes & Rights Payments 70.8 70.8 0.0 72.2 72.2 0.0										
	Total S	hared Services and Other Costs	12.4	9.0	3.4	0.4	8.0	-0.4		
TOTALTransmission OM&A 436.3 401.8 34.5 450.0 413.0 37.0	Property Ta	axes & Rights Payments	70.8	70.8	0.0	72.2	72.2	0.0		
	TOTALTrai	nsmission OM&A	436.3	401.8	34.5	450.0	413.0	37.0		

Updated: September 23, 2010 EB-2010-0002 Exhibit I Tab 4 Schedule 29 Page 3 of 3

# HYDRO ONE NETWORKS INC. TRANSMISSION CAPITAL 2011/2012 PLAN

		 Minimum				2012			
					Minimum				
		Filed	Level	Variance	Filed	Level	Varianc		
ustaining									
Stations									
	ircuit Breakers	23.6	20.3	3.3	24.9	25.3	-0.4		
	tation Facility Re-investment	84.0	70.0	14.0	84.7	83.2	1.4		
	ower Transformers	63.5	54.8	8.7	65.7	63.2	2.4		
	Other Power Equipment	19.6	11.8	7.8	21.2	12.2	9.0		
	rotection, Control, Monitoring			7.0			0.0		
	nd Telecommunications	93.8	88.4	5.3	107.5	99.8	7.7		
	ncillary Systems	18.0	13.1	4.9	18.1	13.3	4.9		
	ransmission Site Facilities and	10.0	13.1	4.5	10.1	13.3	4.5		
	nfrastructure	26.5	10.6	15.9	26.4	11.3	15.1		
	tations Environment	8.4	4.2	4.2	8.5	4.3	4.3		
	otal Stations	337.3	273.1		356.9	312.6			
ı	otal Stations	337.3	2/3.1	64.1	356.9	312.6	44.4		
Lines									
	overhead Lines Refurbishment and								
C	Component Replacement	55.6	43.7	11.9	57.6	44.0	13.6		
Т	ransmission Lines Re-Investment	8.9	10.5	-1.6	7.3	10.0	-2.7		
U	Inderground Lines Cable								
R	efurbishment and Replacement	22.2	12.5	9.7	21.6	13.1	8.5		
Т	otal Lines	86.7	66.6	20.1	86.5	67.1	19.3		
tal Sustainir	ng	424.0	339.8	84.2	443.4	379.7	63.7		
L L	nter Area Network Transfer Capability ocal Area Supply Adequacy oad Customer Connection &C Enablement for	307.9 150.5 81.8	349.8 145.7 89.9	-41.9 4.8 -8.1	139.3 101.4 84.7	317.4 94.7 81.8	-178.1 6.7 2.9		
G	Seneration Connections	11.4	23.5	-12.1	36.0	37.4	-1.4		
	S Upgrades to Facilitate Distribution			05.0		4440			
	Generation	33.8	69.0	-35.2	81.4	114.0	-32.6		
	erformance Enhancement and	24.0	21.8	2.2	7.2	0.0	1.0		
	tisk Mitigation					6.2			
د tal Developn	mart Grid	7.8 <b>617.2</b>	1.5 <b>701.4</b>	6.3 -84.2	6.8 <b>456.8</b>	1.2 <b>652.7</b>	5.6 <b>-195.9</b>		
tai bevelopi	nent .	017.2	701.4	-04.2	430.0	032.1	-133.3		
perating									
	orid Operating and Control Facilities	22.6	12.9	9.7	18.5	12.3	6.2		
	ntegrating Operating Infrastructure	21.7	24.1	-2.4	38.9	25.7	13.2		
tal Operating	g	44.3	36.9	7.4	57.4	38.0	19.4		
TAL Sustair	ning, Development & Operations	1085.5	1078.2	7.3	957.6	1070.4	-112.8		
ared Service	s and Other Costs	<u>-</u>							
	ransport, Work & Service Equipment	21.6	20.4	1.1	17.0	15.8	1.2		
	nformation Technology	17.2	10.3	6.9	13.3	9.0	4.4		
	cornerstone	3.7	2.3	1.4	1.3	0.5	0.8		
F	acilities and Real Estate	23.9	22.3	1.6	19.1	5.2	13.9		
C	conservation and Demand Management	0.0	0.0	0.0	0.0	0.0	0.0		
Total Shared Services and Other Costs		66.4	55.3	11.1	50.7	30.5	20.2		
OTAL Transm	nission Capital	1151.9	1133.5	18.4	1008.3	1100.9	-92.6		
/IAL IIailSII	nooron oapitar	1131.9	1133.3	10.4	1000.3	1100.9	-32.0		

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