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March 8, 2011

VIA RESS and COURIER

Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto ON M4P 1E4

Dear Ms. Walli:

Re: Interrogatories of The Electrical Contractors Association of Ontario (ECAO) and The Greater Toronto Electrical Contractors Association (GTECA)

Application by 1798594 Ontario Inc. for an electricity distribution licence;
Applications by Toronto Hydro Energy Services Inc. for leave to sell streetlighting assets; and
Application by Toronto Hydro-Electric System Limited and 1798594 Ontario Inc. for leave to amalgamate

Board File Nos. EB-2009-0180, EB-2009-0181, EB-2009-0182, and EB-2009-0183

Please find attached the Interrogatories of ECAO and GTECA in respect of the above applications.

Yours truly,

MACLEOD DIXON LLP

Robert Frank
RIF/ss
Enclosure
c: Applicants (*via email*)

INTERROGATORIES OF
THE ELECTRICAL CONTRACTORS ASSOCIATION OF ONTARIO (ECAO)
AND
THE GREATER TORONTO ELECTRICAL CONTRACTORS ASSOCIATION (GTECA)

Application by 1798594 Ontario Inc. for an electricity distribution licence;
Applications by Toronto Hydro Energy Services Inc. for leave to sell streetlighting assets; and
Application by Toronto Hydro-Electric System Limited and 1798594 Ontario Inc. for leave to amalgamate

Board File Nos. EB-2009-0180, EB-2009-0181, EB-2009-0182 and EB-2009-0183

March 8, 2011

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1. **Reference: Applicants' Additional Evidence, Page 12**

The applicants state: "Despite this, in some cases the intended use of the assets (principally poles, together with associated conductors) at a given location may not be evident by observing their existing configuration."

...

However, in certain settings poles and associated conductors may have been intended to supply future or potential scattered loads such as bus shelters and phone booths, and may in fact be the only overhead infrastructure locally available to meet those needs." [emphasis added]

1.1 What is meant by "principally", i.e. other than poles and associated conductors, what assets are being referenced?

1.2 Other than applying the City of Toronto's Road Classification System, was any analysis done of the assets on Collector and Arterial roads to determine which poles or associated conductors are currently used to supply scattered loads?

1.3 If yes, what analysis was done and what were the results?

1.4 Other than applying the City of Toronto's Road Classification System, was any analysis done to determine which poles and associated conductors are intended to supply future or potential scattered loads?

1.5 If yes, what analysis was done and what were the results?

1.6 Other than applying the City of Toronto's Road Classification System, was any analysis done to determine which poles and associated conductors are the only overhead infrastructure locally available to meet the needs for future or potential scattered loads?

1.7 If yes, what analysis was done and what were the results?

2. **Reference: Applicants' Additional Evidence, Page 13**

The applicants state: "In order to determine the "mixed use" character of certain roads with underground supplies, THESL used the City of Toronto's Road Classification System. This system is described in the document (City of Toronto 2008 Road Classification System) available at the City of Toronto website (at URL www.toronto.ca/transportation/road_class/pdf/rc_document.pdf). In that system, roads are classified as:

- Local
- Collector
- Arterial (major and minor)
- Expressway

...

Accordingly, on the premise that Collector and Arterial streets have existing and future bus shelters, traffic signals and pedestrian crossings which presently do or will require connection to the distribution system, THESL has deemed all Collector and Arterial Streets as meeting the Board's criteria for Mixed Use Areas." [emphasis added]

2.1 Was any analysis done to determine which Collector or Arterial roads have existing bus shelters, traffic signals and pedestrian crossings which presently require connection to the distribution system?

2.2 If yes, what analysis was done and what were the results?

2.3 Was any analysis done to determine which assets on any given Collector or Arterial road are currently configured with existing bus shelters, traffic signals or pedestrian crossings which presently require connection to the distribution system?

2.4 If yes, what analysis was done and what were the results?

2.5 With respect to Collector or Arterial roads which do not currently have bus shelters, traffic signals or pedestrian crossings which presently require connection to the distribution system, was any analysis done to determine whether there are currently any plans for those services to be added in the future?

2.6 If yes, what analysis was done and what were the results?

2.7 Was any analysis done to determine whether there are any differences between Arterial and Collector road types in terms of whether they have existing bus shelters, traffic signals, pedestrian crossings or other scattered loads which presently require connection to the distribution system?

2.8 If yes, what analysis was done and what were the results?

3. **Reference: Applicants' Additional Evidence, Page 13**

The applicants state: "Therefore, THESL has assigned all otherwise eligible streetlight assets (such as poles, but excluding luminaires and brackets) on Collector and Arterial Roads as distribution assets, effectively determining that the assets along Collector and Arterial Roads that feed into Residential Setting Underground Supply qualify as distribution assets. The result of this process using the Road Classification methodology to categorize all Toronto streets provides a comprehensive and correct implementation of the functionality or intended use of assets aspect of the Decision." [emphasis added]

3.1 Was any analysis done to determine whether the Road Classification methodology (i.e. the City of Toronto's Road Classification System) provides a comprehensive or correct analysis of whether specific assets are servicing existing bus shelters, traffic signals, pedestrian crossings or other scattered loads which presently require connection to the distribution system?

3.2 If yes, what analysis was done and what were the results?