

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c. 15, Schedule B;

AND IN THE MATTER OF an Application under Section 74
of the Act by Horizon Utilities Corporation for a license
amendment.

**HORIZON UTILITIES CORPORATION
INTERROGATORIES TO
HYDRO ONE NETWORKS INC.**

JANUARY 23, 2013

Interrogatories Common to all or Several Parts of Horizon Utilities Corporation (“Horizon Utilities”) Service Area Amendment Application (“SAA Application”)

1. Please provide the names of those witnesses who will appear at the oral hearing of this proceeding to give evidence on behalf of Hydro One Networks Inc. (“**Hydro One**”). Please provide a copy of their respective résumé or *curriculum vitae*.
2. Please file the Ontario Energy Board (“**OEB**” or the “**Board**”) approved rates for Hydro One for 2013 for all residential rate classes, <50 kW, >50kW, and the sub transmission (“**ST**”) rates for common and express feeders.
3. Has the Board approved for 2013 any changes to the rate class descriptions in respect of the density thresholds for the residential rate classes? If so, please detail the changes. Please confirm which residential rate class Hydro One submits is applicable to Parts I, II and III of the SAA Application.
4. When did Hydro One receive a request for an Offer to Connect (“**OTC**”) from:
 - (a) Multi Area Developments Inc. (“**Multi-Area**” or the “**Developer**”); and
 - (b) the Hamilton-Wentworth Catholic District School Board (“**School Board**”);

Please produce a copy of every written request received from either of these prospective customers and any related communications.

5. Reference: Hydro One Pre-filed Evidence filed January 11, 2013, updated January 14, 2013 (hereinafter “**Hydro One Pre-filed Evidence**”)

Preamble

Horizon Utilities’ initial understanding was that Hydro One was proposing to construct a new 27.6 kV circuit along Rymal Road East (“**27.6 kV Rymal Road East Circuit**”) with a connection to either the M3 and/or M4 express feeders which have always exclusively served Horizon Utilities. From Hydro One’s pre-filed evidence filed January 11, 2013, Horizon Utilities now understands that Hydro One is no longer proposing to connect the new 27.6 kV Rymal Road East Circuit to either of the M3 and/or M4 feeder but rather to connect to the M5 feeder at or near the Nebo Transformer Station (“**Nebo TS**”).

Please provide a detailed breakdown of all of the fully loaded costs associated with the 27.6 kV Rymal Road East Circuit, including, without limitation (whether incurred or forecast):

- (a) the cost of connection to the M5 feeder;
- (b) Hydro One’s responsibility for the costs to replace, refurbish or repair Bell Canada telephone poles;

- (c) the cost to reframe or refurbish poles;
- (d) the cost to replace any Hydro One poles;
- (e) the cost to install all wires, supports, conductors (including labour, equipment and materials);
- (f) the cost to install the several "Rabbits" which currently provide power to the Summit Park 7 development;
- (g) any other labour and materials associated with the design, acquisition, and construction of this proposed circuit; and
- (h) the cost of the planned upgrades at the Nebo TS to provide additional load to the M5 feeder (or the 27.6 kV Rymal Road East Circuit).

In the event that the interconnection with the M3 or M4 express feeders remains a consideration by Hydro One, please respond to the same questions above detailing all of the costs associated with the new 27.6 kV Rymal Road East Circuit with the connection at the M3 and/or M4 express feeder.

- 6.
 - (a) Please confirm that Hydro One's current proposal is to extend the proposed 27.6 kV Rymal Road East Circuit from a point near the connection with the M3/M4 feeders west and south to a connection point at or near Nebo TS.
 - (b) What is the distance from the connection point at or near Nebo TS to the proposed connection to Summit Park 7?
 - (c) Please provide a detailed construction route map for the proposed 27.6 kV Rymal Road East Circuit from the Nebo TS to Summit Park 7.
- 7. Assuming that the proposed 27.6kV Rymal Road East Circuit is constructed, what are the costs to connect this circuit to:
 - (a) Multi-Area's Summit Park 7 development; and to
 - (b) Bishop Ryan Catholic Secondary School ("**Bishop Ryan SS**").

Please fully describe and explain your response and why such costs do not appear in Hydro One's OTC to these customers (Appendix C and D to Hydro One's Pre-filed Evidence).

- 8. Reference: Hydro One Pre-filed Evidence

Preamble

Hydro One has stated on a number of occasions that the proposed 27.6 kV Rymal Road East Circuit is necessary to provide service to the Summit Park 7 development

and to the Bishop Ryan SS. Given the capacity constraints at the Nebo TS, please respond to the following questions:

- (a) Is an upgrade at Nebo TS necessary for the purposes of Hydro One providing service to the Bishop Ryan SS and to the Summit Park 7 development?
 - (b) Are any changes planned or forecast at the Nebo TS to provide load to supply these customers?
 - (c) Please produce copies of all documentation between Hydro One Distribution and Hydro One Transmission which relate to any reconfiguration or upgrading of the Nebo TS for the purposes of connecting the proposed 27.6 kV Rymal Road East Circuit to provide load to the Bishop Ryan SS and the Summit Park 7 development. Horizon Utilities requests that the documentation produced include all emails, memoranda, draft Cost Sharing Agreements and executed Agreements commencing as at the date when such reconfigurations or upgrades at Nebo TS were first contemplated.
9. Reference: Hydro One Pre-filed Evidence, page 14 of 15; Appendix E, and Horizon Utilities Interrogatory Responses to Board Staff No. 1 and the Utility Co-ordination Minutes, December 5, 1012.

Preamble

It is the understanding of Horizon Utilities that the City of Hamilton intends to widen Rymal Road East to four or more lanes and require streetlights on both sides of the road. For the purposes of this question, please assume this to be the case and that it will become necessary for Hydro One or Bell to relocate the poles along the south side of Rymal Road East to accommodate the proposed 27.6kV Rymal Road East Circuit, this road widening and street lighting requirements.

Please provide a detailed breakdown of the fully loaded costs that Hydro One will incur to remove the existing poles and wires (whether the poles are owned by Hydro One or not; if the latter is the case, the breakdown should include Hydro One's reasonable contribution to the work). Without limiting the generality of the request, please include in the cost breakdown the following:

- (a) the cost to remove the existing poles and wires (whether owned by Hydro One or not, and in the latter case, the reasonable contribution of Hydro One to the work);
- (b) the cost to acquire new poles and/or replacement wires;
- (c) the labour costs associated with all of the work, including planning and execution;
- (d) any costs associated with the reconnection of Bishop Ryan SS and/or

the Summit Park 7 development as a result of the work.

10. Reference: Hydro One Pre-filed Evidence

Preamble

Horizon Utilities now understands that Hydro One is no longer proposing to connect the proposed 27.6 kV Rymal Road East Circuit to the M3 and/or M4 feeder. It is now proposing to connect to the M5 feeder, which does not serve Horizon Utilities.

- (a) Please confirm that Hydro One is no longer considering connecting the proposed 27.6 kV Rymal Road East Circuit to the M3 and/or M4 feeder.
- (b) If the connection to the M3/M4 remains a possibility, please respond to the following questions:
 - (i) Does Hydro One agree that the M3/M4 feeders constitute subtransmission (“**ST**”) circuits and that in 2011 these circuits solely serviced Horizon Utilities?
 - (ii) Does Hydro One agree that where feeders such as the M3/M4 feeders solely serve Horizon Utilities, that such feeders are designated as an “express feeder” and that Horizon Utilities is therefore eligible to pay the approved express feeder ST rate?
 - (iii) What rates did Hydro One charge Horizon Utilities for the M3/M4 feeders in 2012? Does Hydro One agree that Horizon Utilities should have been charged an express ST rate under Hydro One’s approved ST rates? What is Hydro One’s estimate of the refund due to Horizon Utilities as a result of this error in billing for 2012?
 - (iv) Is it Hydro One’s position that if the 27.6kV Rymal Road East Circuit is connected to the M3/M4 feeder, that to supply either or both of Bishop Ryan SS Ryan or Summit Park 7, then the feeder will then become “common” and subject to the rate applicable to the ST rate for common feeders?

11. When did Hydro One decide to no longer use the M3/M4 connection for the proposed 27.6 Rymal Road East Circuit? Please explain the reasons for the change? Please produce all construction drawings and specifications which identify this change and the additional route this circuit will follow. If these documents are not dated, please advise of the date of their creation.

12. Please provide a detailed history of the planning, execution and installation by Hydro One of the proposed 27.6 kV Rymal Road East Circuit. In addition, please provide a copy of all internal and external (such as Bell Canada) communications including,

without limitation, all memoranda, plans, emails, studies, work orders.

13. Reference: Hydro One Pre-filed Evidence and Distribution Area Study, Appendix A

For the purposes of Hydro One's planning in respect of the new M5 feeder proposed along Rymal Road East, please advise of the details of all assets health, visual inspection, and any third party testing that was undertaken in respect of the poles which exist along the preferred and alternate routes. Please produce copies of all documentation generated as a result, including inspection reports and third party test results.

14. Please provide a complete copy of all earlier versions and iterations (whether draft or otherwise) of the Distribution Area Study for Ancaster and Glanbrook Areas 2010-2022, found at Appendix A of Hydro One's pre-filed evidence.

15. Please provide a complete copy of all earlier versions and iterations (whether in draft or otherwise) of the document entitled "Hydro One - Dundas Area Loop Feed to Binbrook", filed as Appendix B of Hydro One's pre-filed evidence.

16. Please provide a detailed description and chronology of the history of all work undertaken by Hydro One to date on the proposed 27.6 kV Rymal Road East Circuit, including:

- (a) the date when the circuit was first considered as an option internally at Hydro One;
- (b) when plans for the circuit were first prepared;
- (c) when approval was first given for the work;
- (d) when was the work first scheduled to commence;
- (e) the actual dates that work was undertaken and the status of the work;
- (f) a description of the work completed on each of the dates identified; and
- (g) A timetable of all future scheduled work.

If not already produced in response to an earlier question, please provide copies of all documentation confirming the above. Please also produce copies of all construction schedules.

17. Please provide the Hydro One construction standards in 2012 for the design of a 3-phase 27.6KV distribution line, as per Ontario Regulation 22/04 under the *Electricity Act*, Sections 6 and 7. Please include the standards for pole heights, framing and conductor sizing, including the associates bills of material.

18. Please produce the approved design plans that were used to construct the line modifications that have been undertaken on the south side of Rymal Road East between Trinity Church and Summit Park 7 (being part of the proposed 27.6 kV Rymal Road East Circuit), as per Regulation 22/04, Sections 6 and 7, evidencing the bill of material, pole heights of new poles installed by Hydro One, and the height of existing Bell poles that have been re-framed. Please produce the credentials of the individual who signed-off on the Certificate of Approval as per Regulation 22/04, Section 7.
19. Please provide the Hydro One Construction Verification Program for the work undertaken on the south side of Rymal Road East between Trinity Church Road and Summit Park 7, as per O. Reg. 22/04, Section 8. Please specify if, prior to commencing this new construction, the Construction Verification Program was used to sign-off, or if the sign-off was provided by the ESA or a Professional Engineer.
20. Please provide the Records of Inspection and Certificates for the construction of the line modifications undertaken on the south side of Rymal Road East between Trinity Church Road and Summit Park 7, as per O. Reg. 22/04, Section 8. Please provide the credentials of the individual(s) who signed-off the Records of Inspection and Certificates.
21. What were the original line voltage levels and the number of phases on the distribution line on the south side of Rymal Road East between Trinity Church Road and Summit Park 7 prior to the construction which Hydro One has recently undertaken? What are the current line voltage levels and the number of phases? What are the planned future line voltages and number of phases of this distribution line in order to service the Summit Park 7 development and the Bishop Ryan SS?
22. Does Hydro One consider the construction that took place on the south side Rymal Road East between Trinity Church Road and Summit Park 7 a Line Upgrade, a New Line, a Line Replacement, or a Like-for-Like construction as per the definition in Regulation 22/04?
23.
 - (a) Does Hydro One agree that in the event it provides service to the Bishop Ryan SS and/or Summit Park 7 through the proposed 27.6 kV Rymal Road East Circuit that there will be a period of service disruption while Hydro One Transmission and/or Hydro One Networks completes the upgrades to the Nebo TS?
 - (b) Please provide Hydro One's reasonable estimate of the extent of the service interruption and Hydro One's plans for providing alternate service to Bishop Ryan SS and the Summit Park 7 homes and businesses during this period of service interruption.
 - (c) When is the work to upgrade the Nebo TS scheduled to commence and be completed?
24.
 - (a) Does Hydro One acknowledge that in the event that there is a service

interruption due to a problem with the proposed 27.6kV Rymal Road Circuit (for example, a pole is struck by a truck and the circuit is damaged), Hydro One would have no alternative means of providing load to Bishop Ryan SS and/or Summit Park 7?

- (b) If the answer to this question is No, please provide a detailed response and explanation supporting the response.
25. Is it correct that the proposed new 27.6kV circuit will not provide loop feed protection to Summit Park 7 or the Bishop Ryan SS in 2013? If not, please provide a detailed description of how Summit Park 7 and Bishop Ryan SS will be provided with loop feed protection. Please also provide a line diagram depicting the loop feed. If the loop feed is to be constructed at some point in the future, what are the current proposed dates and what are the cost estimates involved with the work.
26. Please provide a detailed list, including all sources of data and assumptions used in respect of Hydro One's revenue projections used in its OTCs to Multi-Area and to the School Board. Without limiting the generality of the following, this should include a detailed list of all assumptions including the load projections for the houses at Summit Park 7.
27. What percentage of the homes does Hydro One estimate will be heated electrically, by natural gas or by any other means? What are the specific load forecasts used?
28. Reference: Horizon Utilities Response to Board Staff No. 1

Preamble

In an email dated February 22, 2012 (provided to Horizon Utilities by Multi-Area Developments Inc.) from Gordon Messervey, Supervisor Planning and Design, Hydro One, Mr. Messervey stated in respect of the Summit Park 7 development:

“Based on the information I have seen on this site would this project not fall into the category or be considered one that we should support the SAA on? Isn't there approx. \$400K of expansion/enhancement just to get our supply to that site?”

- (a) Please ask Mr. Messervey to provide a list of all of the information he is referring to in his email and to produce copies of same.
- (b) Please also ask where and how Mr. Messervey determined that the costs to get supply to the site would be “approx \$400K”. Please produce copies of all documents Mr. Messervey examined for the purpose of arriving at this estimate.
- (c) Please produce any responses to this email and summarize any oral discussions which relate to this email by Mr. Messervey.

29. Reference Hydro One Pre-filed Evidence at page 11 of 15, re Parts II and III of Horizon Utilities' SAA Application

Preamble

Hydro One states that if Parts II and III of Horizon Utilities' SAA Application are approved, there will be approximately \$15,000 of existing assets that would be stranded.

- (a) Please provide a detailed breakdown, by type of equipment, age and by location, of this \$15,000 estimate.
30. Please specifically identify, by Docket and evidentiary citation in each Application, all prior Applications by Hydro One to the Board that identifies or references Hydro One's intention to proceed with the proposed 27.6 kV Rymal Road East Circuit. Please produce copies of these filings.
31. Reference: Distribution Area Study, Appendix A to Hydro One Pre-filed Evidence, Figure 1
- (a) Figure 1 sets out the Study Area for the Distribution Area Study. Does Hydro One accept that the Study Area includes some of Horizon Utilities' service area?
- (b) Please list all of the dates and attach copies of all communications from Hydro One to Horizon Utilities evidencing Hydro One's consultations with Horizon Utilities and/or requests for information for the purposes of its Distribution Area Study.
32. With specific reference to the proposed 27.6 kV Rymal Road East Circuit, please provide copies of all communications and correspondence from Hydro One to Horizon Utilities inviting Horizon Utilities to comment on this proposed work, requesting any input in respect of Hydro One's planning, any requests by Hydro One for information from Horizon Utilities as to the availability of its assets to serve the SAA lands and all documentation evidencing Hydro One's notice to Horizon Utilities that Hydro One intended undertake this work.
33. What is the distance to the closest Hydro One Operations Centre or alternative dispatch able location for the lands that are the subject of Horizon Utilities' SAA Application? Where is the nearest Hydro One Operations Centre located?
34. Reference: Distribution Area Study, Appendix A to Hydro One Pre-filed Evidence, page 5 of 17, Table 2

Preamble

This Table sets out feeder capacity and loading, existing and a 10-year forecast. For the Nebo TS M5, it indicates in the Notes to the Table that: "Red Hill Business Park is estimated to be 26MVA during the study period and is shown on Nebo M5 for the

2017 and 2022”.

- (a) Please provide a map depicting the location of the Red Hill Business Park and Hydro One’s proposed route of the M5 feeder to supply the Red Hill Business Park.
 - (b) What is the impact in amps of adding 26MVA to 288 amps.
35. Reference: Distribution Area Study, Appendix A to Hydro One Pre-filed Evidence

Please confirm that the 8.32 kV supply to the SAA Application lands in question is via Dickenson Road DS F3 feeder. If not, please indicate which F-class feeder currently provides 8.32 kV service to the SAA Application lands in question and provide a line diagram evidencing this feeder from the customers on Rymal Road East back to the Dickenson DS.

Interrogatories relating to Part I – Summit Park

36. Does Hydro One acknowledge that its current 8 kV circuit which is located on the south side of Rymal Road East is insufficient to supply the load required by the approximately 286 houses (and possible commercial or institutional applications) which are currently being constructed as part of the Summit Park 7 residential development?
37. Please provide a copy of the Standard Terms and Conditions for Multi-Service Connection Projects V1 06-2011.
38. Please produce copies of all written communications (including memoranda, notes to file confirming telephone conversations, emails, etc.) between Hydro One and Multi-Area that relate to load requirements, upstream capacity available, construction timelines, Hydro One specifications, oral or written representations and any warranties or indemnities given by Hydro One.
39. Reference: Hydro One OTC to Multi-Area, dated July 27, 2012, page 6, Schedule A – Description of the Contestable and Non-Contestable Work, and page 7, Schedule “B”, Description of Civil Work

Preamble:

Hydro One’s OTC includes a description of contestable work that Hydro One or the developer/contractor can perform at Schedule “A”, on page 6. This page identifies two items under the subheading dealing with underground lines. On page 7, “Schedule B”, Description of Civil Work, the OTC states that the developer “shall perform the following civil work at its own expense”. Schedule B’s description of civil work, at page 7, goes on to itemize a number of areas of civil work specifically.

- (a) Please advise whether for the purposes of this OTC, Hydro One’s estimate of the costs of contestable work excluded the civil work

contemplated under Schedule B, at page 7 of the OTC.

- (b) If some portion of the civil work identified on page 7 of the OTC was included in the contestable costs included in the OTC, please provide a detailed breakdown with estimates of the work, by type of work, which was included or excluded from the Hydro One OTC contestable work calculations.

40. Reference: Hydro One OTC to Multi-Area, dated July 27, 2012, Hydro One Pre-filed Evidence, Appendix D

Preamble

Hydro One has included in its OTC, at Schedule F, the Basic Discounted Cash Flow calculation under the heading "Capital Costs and Charges Option A" the sum of \$850,665. This is the aggregate of the total of the Option A non-contestable work totals (Sections 1.1, 2.1, and 2.2) and the contestable totals (Sections 4.1 and 4.2). By comparison, the aggregate of all of the non-contestable work under Option B (Sections 1.1, 2.1, 2.2 and 4.2) is \$571,849.

- (a) Please explain why the non-contestable worksite inspection costs were not included in the Basic Discounted Cash Flow calculation;
- (b) Please re-do the economic evaluation including the \$38,253 amount for the non-contestable worksite inspection costs under the Option B alternative selected by Multi-Area.
- (c) Does Hydro One have the ability to recover any additional amount from Multi-Area under the OTC for these costs? Does Hydro One have the right to undertake a final economic evaluation under the terms of its OTC?

41. Reference: Hydro One OTC to Multi-Area, dated July 27, 2012, and Hydro One Pre-filed Evidence, Appendix D

Preamble

Hydro One estimated in its OTC total Contestable Work charges of \$317,068 (the aggregate of Total Costs, Sections 4.1 and 4.2). Hydro One's pre-filed evidence, at page 4 of 15, states that total contestable costs are in fact \$538,900.

- (a) For the purposes of any final economic evaluation, will Hydro One use its under-estimate of the contestable costs of \$317,000 or the actual contestable costs of \$538,900?
- (b) Has Hydro One advised Multi-Area of its intention in this regard?

42. Does Hydro One acknowledge that under its OTC with Multi-Area, Horizon Utilities is using the direct buried method to install wires as part of the civil work at the Summit

Park 7 development? Does Hydro One acknowledge that all six prior phases of the Summit Park development, Horizon Utilities has installed wires in ducts, pursuant to its specifications? As a general matter, does Hydro One acknowledge that installing wire in ducts is more expensive than the direct buried method? Does Hydro One also acknowledge that the use of duct for underground wires tends to reduce the incidents of interruptions by excavations and facilitates the replacement of faulty wire?

43. Reference: Hydro One OTC dated July 27, 2012, Appendix D

Please provide the CD-ROM identified in Hydro One's OTC as Schedule C – "Hydro One Overhead and Underground Distribution Standards – 2011 Edition".

44. Reference: Hydro One OTC dated July 27, 2012, Appendix D

Please provide Schedule D to Hydro One's OTC, consisting of Drawing 00351-12-116 Rev 06.

45. Does Hydro One acknowledge that its OTC to Multi-Area does not include the costs to provide service from the lot line to the meter and metering to the individual homes? If not, please explain where these costs are included and the amount for Summit Park 7?

46. Reference: Hydro One OTC dated July 27, 2012 to Multi-Area, Appendix D to the Pre-filed Evidence

Preamble

The Hydro One OTC to Multi-Area dated July 27, 2012 contains Basic Discounted Cash Flow calculations and uses a figure of 2477 meters of UG Line. This figure, divided by the 287 lots which make up Summit Park 7, equals 8.7 meters per lot, or 28.3 feet which appears to account only for the primary conductors required for the subdivision.

- (a) Please provide the basis (including any applicable plans and specifications) which support an estimate of 2477 meters for Summit Park 7.
- (b) Please advise whether this figure also includes the secondary conductors on municipal rights-of-way. If it does not, how and where has Hydro One included the costs for the secondary conductors on municipal rights-of-ways?

47. Reference: Hydro One OTC dated July 27, 2012

If not answered in an earlier question, please confirm what assumptions Hydro One has used in respect of revenues arising from the Summit Park 7 development in each of the years 2012 – 2015.

48. Reference: Hydro One OTC dated July 27, 2012

Which rate class did Hydro One use for the purposes of its OTC dated July 27, 2012?

49. Reference: Hydro One Pre-filed Evidence, Hydro One's OTC to Multi-Area dated July 27, 2012

Preamble

Hydro One has not included any costs for upstream expansion work in its OTC to Multi-Area. Horizon Utilities takes the position that the proposed 27.6 kV Rymal Road East Circuit which Hydro One must necessarily construct to provide service to the Summit Park 7 development and to the Bishop Ryan SS constitutes upstream expansion work.

Should the Board conclude that the proposed 27.6 kV Rymal Road East Circuit is upstream expansion work, what amount would Hydro One have included in its OTC to Multi-Area? Please provide a breakdown of this figure and a detailed explanation as to how it has been calculated.

Interrogatories relating to Part II: Fletcher Road Legacy Properties

50. Hydro One requested by email dated September 26, 2012 from Robert Davidson to Horizon Utilities that it agree to the transfer of the 3 legacy homes on the west side of Fletcher Road. Is Horizon Utilities' evidence that Hydro One subsequently orally rescinded this request correct? If so, please provide a detailed explanation for Hydro One's rescission of its request that Horizon Utilities assume the transfer of these customers.

51. Does Hydro One acknowledge that either Multi-Area or Hydro One is required to remove the several legacy poles on Fletcher Road as part of the Site Plans approved by the City of Hamilton in respect of its streetscape requirements?

52. Assuming Part II of Horizon Utilities' SAA Application is not approved, please detail Hydro One's plans to provide service to these 3 legacy homes on the west side of Fletcher Road after the poles are removed. Please include in your answer:

- (a) a map or plan depicting the route Hydro One proposes to take to provide service to these customers and the details of how the necessary wires/transformers will be installed.
- (b) a detailed breakdown of the costs to undertake all of the work contemplated by (a); and
- (c) who will be responsible to pay for these costs (i.e., from its stakeholders, Multi-area, the customers, or some other entity) and how

will these costs be recovered.

Interrogatories Relating to Part III: Rymal Road Legacy Properties

53. In the event that Part III of Horizon Utilities' SAA Application is not approved, please detail Hydro One's plans to provide service to the 3 legacy Hydro One customers on the south side of Rymal Road East. Please include in your answer:
- (a) a map or plan depicting the route Hydro One proposes to take to provide service to these customers and the details of the equipment (i.e., wires, transformers) that will be installed to connect the customers to the proposed 27.6 kV Rymal Road East Circuit.
 - (b) a detailed breakdown of the costs to undertake all of the work contemplated by (a); and
 - (c) who will be responsible to pay for these costs (i.e., from its stakeholders, Multi-area, the customers, or some other entity) and how will these costs be recovered.

Interrogatories relating to Part IV: Bishop Ryan Catholic Secondary School

54. Does Hydro One accept that its current 8 kV circuit along the south side of Rymal Road East does not have the capacity to reliably provide the load required by the new Bishop Ryan Catholic Secondary School ("Bishop Ryan Secondary") currently under construction?
55. The Electronic Layout/Schedule 'A' on the Hydro One OTC dated November 25, 2012 indicates that the feeder to be used is M3. A revised OTC dated December 14, 2012 now indicates that the feeder will be M5. Why was a different feeder selected? How will the connection to M5 be completed?
56. The Electronic Layout/Schedule 'A' on the OTC dated November 25, 2012 indicates in Section 3 that the Connection Work that can be performed either by Hydro One or a Contractor as per the customer's choice at a cost of \$3,439.27 and consisted of "load break elbows, operate elbow, bushing cap, HI-POT cable and bushing insert". The revised OTC dated December 14, 2012 no longer indicates that this Connection Work is required. Were these costs omitted, or was the design changed? Please explain.
57. Both OTCs indicate that Bell needs to change an end-of-life 40' pole for a 45' pole. Is there a cost to Hydro One for the extra pole height? If yes, will this cost be passed to the customer?
58. The Electronic Layout/Schedule 'A' on the OTC dated November 25, 2012 indicates that the Rate Class is UGd – Urban General Services. A revised OTC dated December 14, 2012 now indicates that the Rate Class is ST- Subtransmission. Why was a different rate class selected? How does this rate class affect the OTC?

Please provide details.

59. Reference: Hamilton-Wentworth Catholic District School Board letter dated December 18, 2012, to Tammy O’Sullivan, Hydro One, re the Hydro One “Second Offer to Connect”.

Preamble

Attached to the above-noted letter, which has been filed with the Board, is an analysis prepared by the School Board’s electrical engineer, NRG Consultants (“NRG”). The letter indicates that NRG undertook a comparative evaluation of costs and in the attachment – Bishop Ryan Electricity Cost Analysis (Revision 1) – it appears that NRG has used Hydro One’s 2012 ST rate.

Please confirm the percentage by which Hydro One’s 2012 ST rate has increased for 2013 over the 2012 ST rate.

60. Reference: Hydro One Pre-filed Evidence, page 7 of 15

Preamble

Hydro One sets out the reasons why it should remain the service provider for the Bishop Ryan SS at page 7 of its Pre-filed Evidence.

- (a) Please confirm whether Hydro One received a copy of the letter dated December 18, 2012 from David Morrissey, Controller of Plant, Hamilton-Wentworth Catholic District Board, to Tammy O’Sullivan, Hydro One.
- (b) Has Hydro One subsequently received any further communications, whether oral or in writing, which would indicate that the School Board has reached a conclusion other than that set out in the December 18, 2012 letter? If so, please produce copies of all such correspondence and communications.

61. Reference: Hydro One OTC dated December 14, 2012

Preamble

Horizon Utilities understands that Hydro One has used a ST rate for the above OTC.

- (a) Please confirm that this is correct. If so, is there a threshold demand which the Bishop Ryan SS must achieve, failing which it is no longer eligible to pay the ST rate? What is the threshold? Would the alternative rate be the GS>50 kW rate in the event that the Bishop Ryan SS falls below this threshold?

62. Reference: Hydro One Pre-filed Evidence, page 7 of 15 and Hydro One's OTC to the School Board dated December 14, 2012

Preamble

Hydro One has not included any costs for upstream expansion work in its OTC to the School Board. Horizon Utilities takes the position that the proposed 27.6 kV Rymal Road East Circuit which Hydro One must necessarily construct to provide service to the Bishop Ryan SS and to Summit Park 7 constitutes upstream expansion work.

- (a) Should the Board conclude that the proposed 27.6 kV Rymal Road East Circuit is upstream expansion work, what amount would Hydro One have included in its OTC to Multi-Area? Please provide a breakdown of this figure and a detailed explanation as to how it has been calculated.

Interrogatories relating to Part V: Balance of Multi-Area Lands

63. Does Hydro One acknowledge that the lands which relate to Part V of the SAA Application are all owned by Multi-Area and slated for further urban residential, commercial and institutional development?
64. In the event that Parts I and IV of the SAA Application are granted by the Board, does Hydro One accept that it would make no practical sense to build the proposed 27.6kV Rymal Road East Circuit to serve the lands included in Part V of the SAA Application?

If Hydro One disagrees, please provide a detailed explanation detailing how Hydro One will recover the costs of the Rymal Road East Circuit, from whom, and over what period of time.