



December 31, 2014

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

Re: Toronto Hydro-Electric System Limited 2015-2019 Electricity Rate Application
AMPCO Notice of Motion
Board File No. EB-2014-0116

Dear Ms. Walli:

Attached please find a Notice of Motion from AMPCO in the above noted proceeding.

Please do not hesitate to contact me if you have any questions or require further information.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Adam White", with a long horizontal flourish extending to the right.

Adam White
President
Association of Major Power Consumers in Ontario

Encl.

Copies to: THESL
Intervenors

THE ONTARIO ENERGY BOARD

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 Toronto Hydro-Electric System Limited for an order approving just and reasonable rates and other charges for electricity distribution to be effective May 1, 2015 and for each following year effective January 1 through to December 31, 2019.

NOTICE OF MOTION

The Association of Major Power Consumers in Ontario (AMPCO) will make a motion to the Ontario Energy Board (“the Board”) at its offices at 2300 Yonge Street, Toronto, on a date and at a time to be fixed by the Board.

PROPOSED METHOD OF HEARING:

AMPCO has no preference in the method of hearing this motion.

THE MOTION IS FOR:

1. An order requiring Toronto Hydro-Electric Systems Limited (THESL) to provide full and adequate responses to the questions posed by AMPCO at the Technical Conference for THESL to provide historical information on the total number of asset units replaced and associated spending by year for the period 2010 to 2014 related to THESL’s Capital Investment Plan and specific System Renewal Investment Programs.
2. Such further and other relief as AMPCO may request and the Board may grant.

THE GROUNDS FOR THE MOTION ARE:

1. The Board issued a Notice of Proceeding on an application by THESL pursuant to section 78.1 of the *Ontario Energy Board Act, 1998* for an order approving just and reasonable rates and other charges for electricity distribution to be effective May 1, 2015 and for each following year effective January 1 through to December 31, 2019.
2. Pursuant to Procedural Order No. 1 issued September 17, 2014 AMPCO was approved by the Board as an intervenor in this proceeding. On November 17th and 18th, a Technical Conference was held.
3. AMPCO brings this Motion because THESL has not provided full and adequate responses to information requested by AMPCO at the Technical Conference information relevant to the issues to be decided in this proceeding.
4. At the Technical Conference AMPCO put questions to THESL. AMPCO requested historical information related to THESL's Capital Investment Plan related to System Renewal Investments that is in addition to the evidence already filed. Specifically, AMPCO requested historical information by way of undertakings for THESL to provide information on asset unit replacement quantities and associated spending by year for the period 2010 to 2014 (in the same format as the asset unit quantities THESL provided for the 2015-2019 period) related to the following programs:

Program Index	Program Name	AMPCO Information Request	Transcript Volume 1 Reference (Attachment A)
E6.1	Underground Circuit Renewal	<ul style="list-style-type: none"> • Asset replacement unit quantities by year for the period 2010-2014 for: <ul style="list-style-type: none"> ○ Underground Switches 	Pages 90-92, 101

		<ul style="list-style-type: none"> ○ Underground Transformers ○ Underground Cable (circuit km) <ul style="list-style-type: none"> ● 2010-2019 spending by year for: <ul style="list-style-type: none"> ○ Underground Switches ○ Underground Transformers ○ Underground Cable (circuit km) 	
E6.2	Paper-Insulated Lead-Covered (PILC) Pieceouts and Leakers	<ul style="list-style-type: none"> ● Km of PILC Cable replaced by year for the period 2010-2014 	Page 95, 100
E6.4	Overhead Circuit Renewal	<ul style="list-style-type: none"> ● Asset replacement unit quantities by year for the period 2010-2014 for: <ul style="list-style-type: none"> ○ Wood Poles ○ Concrete Poles ○ Overhead Switches ○ Overhead Transformers ● 2010-2019 spending by year for: <ul style="list-style-type: none"> ○ Wood Poles ○ Concrete Poles ○ Overhead Switches ○ Overhead Transformers 	Page 95, 102
E6.5	Overhead Infrastructure Relocation	<ul style="list-style-type: none"> ● 2015-2019 spending by year for: <ul style="list-style-type: none"> ○ Poles ○ OH Conductor (mts) ○ OH Switches ○ OH Transformers ○ Underground Cable 	Page 102

		Chamber <ul style="list-style-type: none"> ○ Underground Duct (mts) 	
E6.6	Rear Lot Conversion	<ul style="list-style-type: none"> • Asset replacement unit quantities by year for the period 2010-2014 for: <ul style="list-style-type: none"> ○ Poles ○ Transformers ○ Manual Switch ○ Fuse ○ Riser ○ Conductor (m) ○ Cable (m) • 2010-2019 spending by year for: <ul style="list-style-type: none"> ○ Poles ○ Transformers ○ Manual Switch ○ Fuse ○ Riser ○ Conductor (m) ○ Cable (m) 	Page 102
E6.7	Box Construction Conversion	<ul style="list-style-type: none"> • Asset replacement unit quantities by year for the period 2010-2014 for: <ul style="list-style-type: none"> ○ OH Transformer ○ OH Switch ○ Poles ○ UG Switch ○ UG Transformer ○ OH Conductor (km) 	Page 103

		<ul style="list-style-type: none"> ○ UG Cable (km) • 2010-2019 spending by year for: <ul style="list-style-type: none"> ○ OH Transformer ○ OH Switch ○ Poles ○ UG Switch ○ UG Transformer ○ OH Conductor (km) ○ UG Cable (km) 	
E6.8	SCADA-MATE R1 Replacement	<ul style="list-style-type: none"> • Asset replacement unit quantities by year for the period 2010-2014 for: <ul style="list-style-type: none"> ○ R1 Switch ○ RTU • 2010-2019 spending by year for: <ul style="list-style-type: none"> ○ R1 Switch ○ RTU 	Page 104
E6.9	Network Vault Rebuild Program	<ul style="list-style-type: none"> • Asset replacement unit quantities by year for the period 2010-2014 for: <ul style="list-style-type: none"> ○ Vaults ○ Roofs ○ UG Network Units • 2010-2019 spending by year for: <ul style="list-style-type: none"> ○ Vaults ○ Roofs ○ UG Network Units 	Page 104

5. In response to AMPCO's questions THESL did not provide the undertakings or the information requested, on the basis of relevance. A refusal was noted on the transcript.¹ THESL further indicated that to the extent that after reconsideration it could provide anything to AMPCO it would, but otherwise if THESL sustained its objection on the basis of relevance, it would not provide the information.²
6. THESL filed its undertaking responses from the Technical Conference on November 24, 2014. THESL did not provide additional information in response to AMPCO's information requests noted in paragraph 6.

Information is Relevant

7. In its Distribution System Plan evidence (Exhibit 2B Section E Capital Investment Plan) regarding System Renewal Investments (Schedule 6), specifically Programs E6.1 to E6.9, THESL provides future proposed spending for each year for the period 2015 to 2019. For these System Access Investment Programs THESL also maps the historical five year program spend for each year for the period 2010 to 2014, where applicable. For these System Access Capital Investment Programs THESL also provides a Table (Table 1) which shows a breakdown of the total number of asset replacement units by year for the period 2015 to 2019. However, THESL's evidence does not include a similar Table to show the asset replacement unit breakdown for the historical period 2010 to 2014. In AMPCO's view this missing information makes it impossible to compare the quantities and cost of work undertaken for the 2010-2014 period compared to the 2015-2019 period.
8. AMPCO seeks to have THESL provide the number of asset replacement units and related spending under specific System Renewal Investment Programs for the period 2010-2014, in order to undertake its own analysis to assess THESL's historical average capital spend per asset unit compared to the proposed future average spend per asset unit for these programs.

¹Technical Conference Transcript Volume 1 November 17, 2014 Page 101

² Technical Conference Transcript Volume 1 November 17, 2014 Page 103

The purpose of this analysis is to test the pace, reasonableness and appropriateness of THESL's proposed spending for the 2015 to 2019 period.

9. The information requested by AMPCO is pertinent to Issue 3.2 on the Issues List: Is the DSP and the planned capital programs and expenditures for the 2015-2019 period appropriate?
10. THESL indicates that in its last Incremental Capital Module ("ICM") rate application, the Board approved funding for a substantial capital work program and this 2015-2019 application builds on that foundation.³ AMPCO seeks to better understand the average historical spend by asset unit for the certain capital programs identified in order to assess the pace of the proposed work in the same investment programs in this application. For many of THESL's capital investment programs discussed in paragraph 6, the proposed spending for the 2015-2019 period exceeds historical levels.⁴
11. AMPCO seeks an order from the Board requiring that THESL provide the requested historical asset unit quantities and associated spending levels as described in paragraph 6.

**THE FOLLOWING DOCUMENTARY MATERIAL AND EVIDENCE WILL BE RELIED UPON
AT THE HEARING OF THE MOTION:**

1. The Record in EB-2014-0116.
2. Such further and other material as counsel may advise and the Board may permit.

December 31, 2014

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³ Exhibit 1A, Tab 2, Schedule 1, Page 3 lines 13-15

⁴ E6.1, E6.7, E6.8, E6.9,

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Counsel to Toronto Hydro-Electric System Limited

AND TO: Intervenors

Attachment A

1 also a list of programs that directly affect SAIFI, if it's
2 possible to get a listing of those? Or maybe it's already
3 on the...

4 MR. PARADIS: Yes, we can provide that.

5 MS. GRICE: Thank you.

6 MS. HELT: I'm sorry, I was just speaking with Mr.
7 Garner.

8 MS. GRICE: We just have an undertaking, and it's just
9 to provide a list of all of the projects that directly
10 affect SAIFI.

11 MS. HELT: Thank you. That will be Undertaking
12 TCJ1.10.

13 **UNDERTAKING NO. TCJ1.10: TO PROVIDE A LIST OF ALL THE**
14 **PROJECTS THAT DIRECTLY AFFECT SAIFI.**

15 MS. GRICE: Okay. Thank you. The rest of my
16 questions relate to the specific projects under the system
17 renewal category. So the first reference is Exhibit 2B,
18 section E6.1, page 13.

19 Okay. So for each of the programs -- and this was
20 mentioned in the presentation this morning -- THESL has
21 provided a mapping of the historical spending to all of the
22 programs. You've provided the future spending, and on this
23 particular page you provided the program asset replacement
24 units for the period 2015 to 2019.

25 And I just wondered if we can next turn to page 44.
26 You provided a list of the replacement assets, and you've
27 got four different types of switches, three transformers,
28 and three different categories for cable. So I just wanted

1 to sort of break this down a bit and understand better what
2 the unit replacements are.

3 If we look at switches, the four types that you have
4 listed here, and you're replacing them with SCADA switches,
5 would the unit cost be relatively the same and comparable
6 between the four switches to replace them?

7 MR. PARADIS: I'd have to verify that information, but
8 it's something that would be available.

9 MS. GRICE: I'll just keep going then, because I just
10 have more questions along the same line. So the same thing
11 with the transformers. And it looks like the first one
12 you're replacing a non-switchable submersible transformer
13 with a switchable, and then the next two types you're
14 replacing like for like.

15 Again, I was just wondering if the costs for that type
16 of replacement are similar between the three transformer
17 types, and then similarly the same thing for the cable
18 replacement.

19 MR. PARADIS: I think it's best if we just actually
20 get the information specifically and then report back on
21 that.

22 MS. GRICE: Okay. So --

23 MS. HELT: So then should we have that marked as an
24 undertaking?

25 MS. GRICE: Yes. I just wanted to just expand on the
26 undertaking of where I'm trying to take this. So on page
27 13 you provide the full amount of replacement quantities
28 for switches, transformers, and cable. We now through our

1 discussion have broken those down into four switch types,
2 three transformers, and three cable types. And what we're
3 trying to understand is the unit cost comparison with
4 historical spending versus the proposed spending.

5 So the undertaking gets a little more complicated than
6 that. We would like to see what the unit costs are
7 historically, as well as during the capital plan for 2015
8 to 2019.

9 MR. KEIZER: Sorry, when you say historically you're
10 talking about 2014?

11 MS. GRICE: I'm sorry, 2010 to 2014.

12 MR. KEIZER: So you want to know the costs of the
13 switch in 2010 --

14 MS. GRICE: Well, we'd like to know how many units of
15 each type of switch transformer and cable were replaced
16 each year, 2010 to 2014, and the cost, and then have the
17 same information for 2015 to 2019, and what we have right
18 now is a rolled-up quantity for switches, transformers, and
19 cable, so we would like that broken down into the types and
20 then the costs associated with each year.

21 MR. KEIZER: I think just -- a question, I guess,
22 about the doability of that. Is that something that's
23 possible, or something that's going to take an extensive
24 period of time?

25 MR. PARADIS: It would take an extensive period of
26 time. The costs of the assets themselves is probably
27 something we could get. The costs associated with the
28 circumstances of the specific assets that were replaced,

1 that would be extremely difficult.

2 MS. GRICE: I guess I'm just having trouble
3 understanding why it would be difficult.

4 MR. KEIZER: Sounds like you want us to go back and
5 reconcile the equipment in the projects in the past, broken
6 down by each component part. And the question is whether
7 or not it's recorded that way or the records are
8 necessarily kept that way or whether they have to be -- go
9 through and start breaking pieces apart to make that
10 determination.

11 Actually, I guess I'm struggling a little bit with
12 respect to the relevance of what the breakdown between
13 switches, transformers and cables in 2010, '11 or '12
14 actually have to do with 2015 to '19.

15 MS. GRICE: I think the 2015 to 2019 program builds on
16 the ICM capital work. And that was -- that's been stated
17 in the evidence in several places, how it's consistent with
18 and builds on.

19 So in order for us to understand, you know, what
20 you've spent historically and the reasonableness of the
21 spending over the CIR period, we need to understand how the
22 historical costs -- what the unit costs were for that work.

23 MR. KEIZER: I guess on the issue with respect to the
24 past, I mean, the ICM is not '10 and '11. So that's the
25 one issue.

26 I guess the other question is I'm trying to understand
27 or reconcile my mind in terms of whether this is -- a
28 build-up of cost from the bottom is an element of some form

1 of true-up. And I guess I'm not sure that that's something
2 that we necessarily have in that configuration or that
3 format.

4 MR. PARADIS: That's correct. So the tracking of
5 activities and the activities themselves occur on a job
6 basis, and the circumstances of each job will vary greatly.

7 And so reconciling different jobs at that level will
8 be extremely challenging, yeah.

9 MS. GRICE: I guess -- can you help me, then? How can
10 I look at unit costs -- and if we just say over the IRM
11 time frame, so 2012 to 2014, how can we compare the unit
12 costs of the work during the IRM period -- or, sorry, ICM
13 period to what's being proposed in the application?

14 MR. KEIZER: Your concern is that we're actually now
15 paying more for what we're switching out than we would have
16 paid in 2012, let's say, for a switch?

17 MS. GRICE: I guess my concern is the same as yours,
18 that -- in that I think THESL is going to be doing some
19 sampling of projects and looking at contractor costs, unit
20 costs, to determine how -- it's one of your metrics, I'm
21 sorry. I don't recall...

22 The construction efficiency metric, where you're going
23 to be looking at your internal unit costs compared to
24 contractor unit costs. So just to fill out the record in
25 terms of what the historical unit costs were, that's what
26 we're looking for. And we're actually looking for that in
27 a lot of the different program areas, so this was just my
28 beginning.

1 MR. KEIZER: You're looking at that by asset? That's
2 where you originally started your question.

3 MS. GRICE: No, it's within your programs, so within
4 E6.1.

5 MS. KLEIN: Ms. Grice, sorry, we're just trying to get
6 a little bit clearer on what you're asking for here.
7 You're looking for historical unit costs for which programs
8 in particular?

9 MS. GRICE: It starts out I was looking for E6.1, the
10 underground circuit renewal project.

11 And the rest of my questions, I was going to ask the
12 same thing in E6.2 related to paper-insulated, lead-covered
13 piece-out and leaks, because you provide the kilometres for
14 the years 2015 to 2019. So we would be looking for the
15 historical kilometres there as well.

16 Section E6.4, the overhead circuit renewal project, I
17 actually have a few questions there regarding wood poles,
18 but essentially the same thing, to have the number of wood
19 poles and concrete poles, overhead switches and
20 transformers that have historically been installed each
21 year and the cost per year.

22 MS. KLEIN: I think the panel can probably speak to
23 these questions. There are certainly some facts about how
24 we have tracked things historically, as well as, I believe,
25 the difference between certain asset-based programs versus
26 geographically-based programs that maybe they can speak to.

27 MR. WALKER: I think there's a bit of confusion around
28 what you're asking in terms of unit costs.

1 You mentioned our contractor metric. And when we look
2 at that, we have to break apart our project into comparable
3 units to what the contractors bid on. And those units
4 aren't asset units; they're a combination of material,
5 labour, they're overhead costs and so on.

6 But in terms of the projects themselves, we don't
7 break things down to a per-asset cost. We construct things
8 in a way that it's a blended cost across a number of assets
9 that are tracked in a logical way in which an installation
10 is built. So it's difficult for us to break it down in
11 that sense, if I'm understanding what you're asking for.

12 MS. GRICE: So do you have a contractor unit cost to
13 replace a pole?

14 MR. WALKER: Yes, we would.

15 MS. GRICE: That's sort of the way that I'm
16 envisioning it, is looking at your programs. So if we
17 looked at the pole replacement program that you have under
18 overhead -- overhead circuit renewal, on page 13 of the
19 evidence you give the number of poles that you've replaced
20 for the years 2015 to 2019, the number of overhead
21 switches, and the number of overhead transformers.

22 So when I was thinking of unit costs, I was thinking
23 there must be a unit cost to replace a wood pole, a unit
24 cost to replace a concrete pole, a unit cost to replace an
25 overhead switch, and a unit cost to replace an overhead
26 transformer, and that possibly your contractor unit costs
27 would be developed in the same way.

28 MR. WALKER: But they're not, really. The contractor

1 unit cost, as I mentioned, it encapsulates kind of like an
2 assembly.

3 But when we do internal work, we don't track it in the
4 same way. We don't do it that way.

5 So we would have costs associated in a project with
6 the installation of all of the poles, and then we would
7 have costs associated with the framing of all those poles,
8 and so on. We don't have it broken down to a unit.

9 MS. GRICE: Okay. But in terms of looking at your
10 evidence related to your unit costs, if we look at page 13
11 -- and you've got the number of poles 2015 to 2019, and if
12 I asked you to break out the wood poles from the concrete
13 poles and then the dollar value for each of those, would I
14 not get a unit cost for the years 2015 to 2019?

15 MR. WALKER: Well, you could, I suppose, do the math
16 and come up with a number but it isn't a standard unit
17 cost.

18 A contractor, when they bid, they have to account for
19 what they think the volume of units they're going to
20 install are going to be, and they have to set their costs
21 in such a way that they can recover their -- you know,
22 their own costs and make some money on that.

23 In our case, we don't do it this way. We charge the
24 true cost of installing an asset. And that can vary
25 significantly depending on the circumstances of that
26 installation.

27 So if we're installing a pole in the heart of downtown
28 Toronto, that's going to be a different cost than if it's

1 in the northern part of Scarborough, as an example.

2 **QUESTIONS BY MR. RUBENSTEIN:**

3 MR. RUBENSTEIN: Can I ask a question? How do you
4 guys measure your unit costs of certain activities? What
5 metric, or how do you do it?

6 I'm assuming at some level you have determine -- I
7 don't know -- it depends what granular it is, but that
8 you're becoming more productive in doing a certain activity
9 this year as you did last year. How do you guys do that?

10 MR. WALKER: The way that we manage our work is we
11 have a design estimate that takes into account the specific
12 requirements for that particular job. So we take into
13 account the location that that installation is being done,
14 the circumstances, how many circuits are going to be
15 involved in the construction, whether there's parking
16 restrictions, and so and so on.

17 Our designers then put together an estimate that takes
18 into account those specific requirements and we measure
19 ourselves against that design estimate, and it's going to
20 vary depending on the circumstances.

21 MR. RUBENSTEIN: So am I correct you don't actually do
22 it -- and I understand the reason of why you're saying you
23 don't do it, but you don't actually say, Costs us this
24 amount -- this much this year to do poles, you know, to
25 replace a pole, you know, in 2015 and 2016, we hope to have
26 it less, you don't do it -- it's all sort of an
27 individualized estimate per project.

28 MR. WALKER: It's dangerous to try and look at it that

1 way, because each job has its own circumstances, and there
2 are jobs where the cost of installing a pole is
3 significantly different than other jobs.

4 **CONTINUED QUESTIONS BY MS. GRICE:**

5 MS. GRICE: Can I try a simpler one? I just want to
6 make sure I'm fully understanding what you're saying. So
7 if we go to the PILC cable one, E6.2, and you've provided
8 the historical spending 2011 to 2014 on page 4. We have
9 got the future spending, 25 to 2019, and then on page 5 you
10 provide the kilometres of PILC cable that you're going to
11 be installing over the time frame.

12 If I took the dollar value for year, for each of those
13 years, and divided by the kilometres, I think what you're
14 saying is that the dollars per kilometre is not necessarily
15 a unit cost?

16 MR. WALKER: It would not be a consistent cost. It
17 would be an average, but it would not be consistent for any
18 particular job.

19 MS. GRICE: And if we looked at -- and then for that
20 same program we looked at the historical kilometres and
21 dollars, would that information be valuable in assessing
22 the reasonableness of the proposed spending? Would it tell
23 us that?

24 MR. PARADIS: I don't think it would change the
25 previous answer, in the sense that the circumstances of
26 those specific jobs would also have been different from the
27 ones that are planned going forward, and maybe to add a
28 little clarification, in this program there are also

1 instances where the work involves essentially a patch of a
2 cable which would have limited associated cable replacement
3 quantities, and also work where we are actually replacing
4 portions of cables, and obviously those situations would
5 have higher cable kilometre numbers associated with them.
6 So there's no consistent way of comparing activities
7 between years.

8 MS. GRICE: And how about an average comparison? If
9 we took a historical average compared to the average of the
10 future planned spending period?

11 MR. WALKER: Again, if we just look at an average, I
12 don't think it's a meaningful number, because the mix of
13 work within a portfolio or a program in a given year would
14 not be consistently the same year over year. It would be a
15 misleading number to look at it that way.

16 MS. GRICE: Okay. So -- I thank you for your
17 responses, but is there any way that we can get the
18 information, the kilometres, historically per year, and the
19 dollars, in order for us to do some analysis?

20 MR. KEIZER: Talking about this one particular job?

21 MS. Grice: I would like to go beyond this one
22 particular job, but if we could start there.

23 MR. KEIZER: So you want the dollars and the
24 kilometres?

25 MS. GRICE: For 2010 to 2014 by year, the dollars and
26 the kilometres.

27 MR. KEIZER: For PILC?

28 MS. GRICE: PILC.

1 MR. KEIZER: I guess I'm still struggling with the
2 relevance of what you're asking for, I guess. We've
3 already heard from the witnesses that it's not directly
4 comparable, it's not a meaningful number, and it doesn't
5 provide the insights with respect to what happens on a
6 particular job design or particular execution.

7 MS. GRICE: We feel it is relevant, and we would like
8 to see the numbers if we could, please.

9 MR. KEIZER: If you could just -- sorry. Just give me
10 a moment. We're not going to give that undertaking or
11 provide that information, on the basis of relevance.

12 MS. HELT: All right. Then that will be noted as a
13 refusal, then, on the transcript.

14 MS. GRICE: Okay. Then there's probably not a lot of
15 point in me going program by program.

16 Actually, if it's okay, I'm going to go through what I
17 would like to have for the programs, and you can make your
18 refusal or not. So I would be looking for the same
19 information with respect to the underground circuit renewal
20 program, which is project E6.1, to get the historical
21 switches, transformers, and cables by type and dollar
22 amount for each of those years, and then the dollar amount
23 for 2015 to 2019 for each of the asset types.

24 MR. KEIZER: Why don't you go through your list?
25 That's the -- are there any more?

26 MS. GRICE: Yes, I was looking for the same
27 information with respect to overhead circuit renewal,
28 section E6.4, to get a breakdown of the assets on page 13,

1 poles, overhead switches, and overhead transformers, broken
2 down into wood and concrete poles, overhead switches, and
3 transformers for the years 2010 to 2014, the number per
4 year, and the dollar value per year, along with the dollar
5 value for each of those assets, 2015 to 2019.

6 I was looking for the same information with respect to
7 E6.5, and actually, this one is a little different, because
8 it's a new program. There was no spending in 2010 to 2014,
9 but on page 10 you provide a list of the assets and the
10 number that you were going to do in each year, 2015 to
11 2019, and I was looking for the same table, but with the
12 dollar values put in.

13 So I'm wondering if that's something you could
14 provide.

15 MR. KEIZER: Well, why don't we keep going?

16 MS. GRICE: Okay. I was looking for the same thing
17 for rear-lock conversion. Page 5 provides a listing of the
18 assets and the quantities for 2015 to 2019. I was looking
19 for the same table for 2010 to 2014, with the quantity of
20 assets, and then the same tables provided with the dollar
21 values for each of those assets by year.

22 MR. KEIZER: So that's slightly different. That's not
23 by unit basis that you were speaking about? You just want
24 this table on the historical basis? Is that what you're
25 saying?

26 MS. GRICE: On a historical basis as one table, and
27 then the next table is to get the dollar values for each of
28 those assets.

1 MR. KEIZER: Oh, along the same lines that you were
2 asking for before.

3 MS. GRICE: Yes.

4 MR. KEIZER: Okay.

5 MS. GRICE: Same thing with box construction
6 conversion. That's program E6.7, page 9. There's a table
7 there with all of the assets and the quantities for 2015 to
8 2019, looking for the assets, numbers, the quantities for
9 2010 to 2014, and the dollar value for each of those assets
10 historically, and for 2015 to 2019.

11 Now, just based on a comment you just made, would you
12 be willing to provide just the quantities historically and
13 not the dollar values?

14 MR. KEIZER: What I would do, to be honest with you,
15 is if you've provided the listing, I think I would object
16 to them all on the basis of relevance. And to the extent
17 that after reconsideration we could provide anything to
18 you, we would, but otherwise if we sustained our objection
19 on the basis of relevance, we would not provide it.

20 MS. GRICE: If I filed something that showed - is that
21 what you...

22 MR. KEIZER: No, I'm not telling you do anything,
23 really. All I'm saying is we're going to on the basis of
24 relevance, because I'm not sure, quite honestly, with
25 respect to the total tables, without consulting with
26 Toronto Hydro, as to whether it's something that fits
27 within the same ambit that you were already looking for,
28 that we did object on.

1 So I would think that you should register your
2 questions on the record. We're going to object on the
3 basis of relevance with respect to the per-unit aspects of
4 this, where it would enable us -- or given our position
5 with respect to the per-unit issues that we've already laid
6 out. And if there are elements that we think that are
7 relevant, then we could provide those, but if they're not
8 relevant we won't provide them.

9 MS. GRICE: Okay. I'll keep going.

10 Program E6.8 is a SCADA-MATE R1 switch renewal, on
11 page 6:

12 "Provide an asset table with the quantities for
13 2015 to 2017."

14 Again, we would be looking for the quantities for 2013
15 and 2014, where you had historical spending split between
16 the asset units and then the associated costs for each of
17 the years.

18 E6.9, network fault renewal, same thing. Page 12:

19 "The assets are provided: vaults, roofs and
20 underground network units."

21 We would be looking for the historical quantities for
22 the same asset groups for 2010 to 2014, and the associated
23 dollars per year for the whole thing, I guess, for the
24 whole thing, 2010 to 2019.

25 Here's a question that I have that maybe you can
26 answer, and that has to do with E6.10, which is the network
27 renewal program. On page 4, you provide the network unit
28 assets that are going to be replaced, and I understand