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BY RESS and EMAIL

April 2, 2015
File No.: 270052.00020/17631

File: EB-2014-0116

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

Dear Ms. Walli:

**Re: File Number EB-2014-0116, Toronto Hydro-Electric System Limited
Application for 2015 Distribution Rate**

Please find enclosed interrogatories of Rogers Communications Partnership; Cogeco Cable Inc. on behalf of itself and its affiliates, including Cogeco Cable Canada LP and Cogeco Data Services Inc.; Allstream Inc.; and TELUS Communications Company and its affiliates (the "Carriers") filed in accordance with the direction in Procedural Order No. 7 that "Parties and Board Staff seeking information and material that is in addition to any evidence, and that is relevant to the hearing, shall request it by written interrogatories filed with the Board and delivered to all parties on or before April 2, 2015." The Carriers ask the Board to confirm that responses to these interrogatories are currently due April 13, 2015 as provided for in Procedural Order No. 7 for "Responses by parties related to any intervenor evidence".

Yours truly,

A handwritten signature in blue ink, appearing to read "Leslie Milton".

Leslie J. Milton

cc: Applicant and Intervenors (by email)

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 (“**Toronto Hydro**”) 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;

AND IN THE MATTER OF Decision and Procedural Order No. 7 Issued by the Ontario Energy Board on February 23, 2015 establishing a procedure for the review of Toronto Hydro’s proposed increase to its wireline pole attachment rate.

April 2, 2015 Interrogatories of Rogers Communications Partnership; Cogeco Cable Inc. on behalf of itself and its affiliates, including Cogeco Cable Canada LP and Cogeco Data Services Inc.; Allstream Inc.; and TELUS Communications Company and its affiliates (the “Carriers”)

April 2, 2015

ADMINISTRATION COSTS

Carriers-22

Ref: *WR-Carriers-13*

Evidence of Suzanne Blackwell, para. 52

- (a) Provide a detailed description of the activities performed by the Asset Attachment and Lease Department.
- (b) Provide the annual operating expenses of the Asset Attachment and Lease Department for 2011-2015.
- (c) For 2011-2015, provide the annual costs charged by employees to discrete jobs for customer specific work, broken down by the different types of activities performed.
- (d) For 2011-2015, provide the total number of permits issued each year and the annual breakdown of overhead permits issued for each of the following:
 - (i) third party wireline attachers that pay the wireline pole attachment fee;
 - (ii) other third party and related party attachers to distribution poles; and,
 - (iii) other third party and related party attachers to street lighting poles.

Carriers-23

Ref: *WR-Carriers-13(d)*

Evidence of Suzanne Blackwell, para. 63

- (a) For 2011-2015, provide the annual costs incurred by the Asset Attachment and Lease Department to administer the issuance of permits and other activities (i.e. make ready, bonding) that are subject to separate fees levied by THESL.

Carriers-24

Ref: *WR-Carriers-13(h) and 15(b)*

THESL Evidence, Exhibit 4A, Tab 5, Schedule 1

Evidence of Suzanne Blackwell, para. 66

- (a) For 2011-2015, provide a breakdown of the total annual shared services costs for finance, legal and human resources services respectively.

- (b) Provide all supporting evidence for the allocation of shared services costs to the Asset Attachment and Lease Department and to the wireline pole attachment rate respectively.

Carriers-25

Ref: *Evidence of Suzanne Blackwell, paras. 71-73 and Table 3*

- (a) Provide a detailed explanation of the discrepancy between the administration costs claimed by THESL in RP-2003-0249 and in this proceeding.
- (b) Provide a detailed explanation of the discrepancy between the administration costs claimed by THESL in this proceeding and the administration costs that have been approved in other regulatory proceedings in Canada relating to pole attachment rates.

PRODUCTIVITY LOSS COSTS

Carriers-26

Ref: *WR-Carriers-14(a)*

Evidence of Suzanne Blackwell, paras. 92-97 and Table 5

- (a) Identify all specific account level expenses that include the costs of the Pole Inspection Program (PIP).

Carriers-27

Ref: *WR-Carriers-2(a), 4(f) and 14(e)*

Evidence of Suzanne Blackwell, paras. 99-100

- (a) Provide a list of all PIP data input types (name and description) that relate solely to third party wireline communications attachments.
- (b) Provide the total number of PIP data inputs that relate solely to billable third party wireline communications attachments.

Carriers-28

Ref: *WR-Carriers-14(h)*

Evidence of Suzanne Blackwell, para. 87

- (a) For each of 2011-2015, provide an estimate of the annual number of pole replacements that are done individually rather than as part of replacement of a group of poles.

NET EMBEDDED POLE COSTS

Carriers-29

Ref: *WR-Carriers-7, Appendix A*

THESL Evidence, OEB Appendix 2-BA

Evidence of Suzanne Blackwell, para. 111

- (a) Provide a detailed explanation of the disproportionate allocation of Account 1995 amounts to poles and fixture asset values relative to Account 1830's share of the total net embedded value of all property, plant and equipment.

Carriers-30

Ref: *WR-Carriers-8(a) and (b)*

THESL Evidence, OEB Appendix 2-BA

Evidence of Suzanne Blackwell, paras. 112-114

- (a) Provide a detailed explanation of why the adjustment to remove street lighting assets from net embedded pole costs is disproportionate to the additional depreciation claimed in respect of street lighting assets.
- (b) Provide a detailed explanation of the discrepancy between the net embedded costs for street lighting poles and the costs claimed in respect of distribution poles used by third party wireline attachers.

Carriers-31

Ref: *WR-Carriers-11(b)*

Evidence of Suzanne Blackwell, paras. 118-124

- (a) For each of the capital programs listed in the response, provide the number of poles replaced in each of year of the program that were not at the end of their useful life.

Carriers-32

Ref: *WR-Carriers-6(b)*

Evidence of Suzanne Blackwell, paras. 130-132

- (a) For 2011-2015, provide an estimate of the annual cost of all power-specific fixtures included in asset Account 1830. Also provide a detailed description of the methodology used to determine these estimates and all cost inputs to the estimates.

Carriers-33

Ref: *Evidence of Suzanne Blackwell, para. 126, Table 9*

- (a) Provide a detailed explanation for the discrepancy between the net embedded pole costs claimed by THESL in this proceeding and the net embedded costs that pole owners have claimed in other regulatory proceedings in Canada.

DEPRECIATION

Carriers-34

Ref: *WR-Carriers-7(c)*

Evidence of Suzanne Blackwell, para. 146

- (a) For 2011-2015, provide an estimate of the annual depreciation expense that relates to power-specific fixtures included in asset Account 1830. Also provide a detailed description of the methodology used to determine these estimates and all cost inputs to the estimates.

MAINTENANCE EXPENSE

Carriers-35

Ref: *WR-Carriers-10(d), 11(b), 12(a)*

Evidence of Suzanne Blackwell, paras. 151-157

- (a) Provide a detailed explanation of the discrepancy between the trends in PIP costs and the benefits identified by THESL of its pole replacement program.

Carriers-36

Ref: *WR-Carriers-12(a)*

Evidence of Suzanne Blackwell, para. 163

- (a) Provide the number of data inputs included in the PIP that relate to power-specific fixtures.
- (b) Provide a listing of all data input types (name and description) that relate generally to the pole and not specifically to THESL, related party or third party attachments.

POLE COUNTS

Carriers-37

Ref: *WR-Carriers-1(a), 3(c), 5(c), 13(a)*

Evidence of Suzanne Blackwell, paras. 170-174 and Appendix D

- (a) Provide a detailed reconciliation of the differences in the reported total number of poles available for use by wireline communications attachers.

Carriers-38

Ref: *WR-Carriers-3(c) and (d) (unanswered), 4(a) and (g), 5(c), 18(c)*

Evidence of Suzanne Blackwell, para. 176 and Table 18

- (a) Provide a detailed reconciliation of the various total number of poles reported as having:
 - (i) all types of third party attachments; (ii) communications attachments; (iii) wireline communications attachments; and (iv) billable wireline communications attachments.

NUMBER OF ATTACHERS

Carriers-39

Ref: *WR-Carriers-4(a) and (g) and 18*

Evidence of Suzanne Blackwell, paras. 180-188

- (a) Provide a detailed explanation of the methodology used to account for growth in third party wireline communications attachments since the attachment information was collected in the PIP.

- (b) Provide a detailed explanation of the methodology used to estimate the number of third party wireline communications attachments on poles that have not been surveyed.
- (c) Identify the number of poles with billable third party wireline communications attachments based on the PIP. Also explain any discrepancy between this number and the number of such attachments based on billing records.
- (d) Provide a detailed explanation of the methodology used to account for growth in other third party attachments since the attachment information was collected in the PIP.
- (e) Provide a detailed explanation of the methodology used to estimate the number of other third party attachments on poles that have not been surveyed.
- (f) Identify the number of poles with billable other third party attachments based on the PIP. Also explain any discrepancy between this number and the number of such attachments based on billing records.
- (g) Provide a detailed explanation of the methodology used to determine the estimated number of THESL and related third party non-hydro attachments on poles used by third party wireline communications attachers.