Ontario Energy Board

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BY E-MAIL

June 12, 2015

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: Toronto Hydro-Electric System Limited Application for Rates Board File Number EB-2014-0116

Please find attached OEB staff's submission on the Settlement Proposal filed on June 11, 2015.

Original Signed By

Martin Davies
Project Advisor, Electricity Rates & Accounting

2015 ELECTRICITY DISTRIBUTION RATES Toronto Hydro-Electric System Limited

EB-2014-0116

ONTARIO ENERGY BOARD STAFF SUBMISSION

Wireline Pole Attachment Rate

June 11, 2015

INTRODUCTION

On June 11, 2015 Toronto Hydro-Electric System Limited (Toronto Hydro) filed a settlement proposal with respect to its application for an order approving an increase in its wireline pole attachment rate to be effective May 1, 2015.

The parties to the settlement proposal are Toronto Hydro and the following OEB-approved intervenors in the proceeding: the Association of Major Power Consumers in Ontario, the Building Owners and Managers Association of Greater Toronto, the Consumers Council of Canada, Energy Probe Research Foundation, the School Energy Coalition, and Vulnerable Energy Consumers Coalition, collectively referred to as the Ratepayer Intervenors, Allstream Inc., Cogeco Cable Inc. and its affiliates including Cogeco Cable Canada LP and Cogeco Data Services Inc., Rogers Communications Partnership and TELUS Communications Company and its affiliates, collectively referred to as the Carriers.

The settlement proposal represents an agreement on the sole issue of Toronto Hydro's wireline pole attachment rate.

This submission reflects observations which arise from OEB staff's review of the evidence and the settlement proposal, and is intended to assist the OEB in deciding upon Toronto Hydro's application with respect to the issues laid out in the Settlement Proposal and in setting just and reasonable rates.

Submission

OEB staff has reviewed the settlement proposal in the context of the objectives of the Renewed Regulatory Framework for Electricity, other applicable OEB policies, relevant OEB decisions, and the OEB's statutory obligations. OEB staff is of the view that the settlement proposal reflects a reasonable outcome for all customers of Toronto Hydro.

OEB staff submits that when considering the wireline pole attachment rate, the OEB's objectives need to be balanced by the OEB in determining the appropriate wireline rate. OEB staff notes that the original rate was set in 2005 by the OEB in RP-2003-0249. In that decision the OEB determined that the appropriate rate

was \$22.35. In this proceeding evidence was filed by both Toronto Hydro and the Carriers which set out a range of values for the wireline pole attachment rate from \$15.28 to \$66.49. OEB staff submits that the rate of \$42 per pole/per year is appropriate and reasonable in the specific circumstances of this proceeding. The impact of this proposal on distribution rates would result in minimal bill impacts for customers.

OEB staff submits that the OEB's approval of the proposal as filed would adequately reflect the public interest and would result in just and reasonable rates for customers.

---All of which is respectfully submitted---