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 Hydro Ottawa Limited ("**Hydro Ottawa**") for an order approving just and reasonable rates and other charges for electricity distribution to be effective January 1, 2016 through to December 31, 2020.

Interrogatories of Allstream Inc. ("Allstream")

July 13, 2015

Allstream-01

Ref: Exhibit H, Tab 7, Schedule 1, Page Specific Charges – Proposed New Charge: Pole Attachments; Decision and Order RP 2003-0249

Preamble: Refer to Appendix 1 of Decision and Order RP 2003-0249, in which the current province-wide pole attachment rate is calculated.

- (a) Confirm that the value of 3.96 in line "Total Admin per Pole with attachments per year" has not been divided by the number of attachers.
- (b) Confirm that the value of 8.70 in line "Total LIP per Pole with attachments per year" has not been divided by the number of attachers.
- (c) Please provide a revised version of the above reference chart calculating Hydro Ottawa's proposed new pole attachment rate, this time dividing the direct costs portion of the rate by the number of attachers.

Allstream-02

Ref: Exhibit H, Tab 7, Schedule 1, Page Specific Charges – Proposed New Charge: Pole Attachments

- (a) Provide all inputs and assumptions used to calculate net embedded cost per pole.
- (b) Provide the assumed asset life of poles used in the calculation of net embedded costs (if not already addressed in the response to a)).
- (c) Confirm that the net-embedded cost is based on a "bare pole" basis. If not, please file revised net embedded cost with all power-specific components of the pole removed.

Allstream-03

Ref: Exhibit H, Tab 7, Schedule 1, Page Specific Charges – Proposed New Charge: Pole Attachments. And Exhibit B Tab 1 Schedule 2, Page 90-94.

Premable: Table 2.2.6 of the Application (Exhibit B Tab 1 Schedule 2 page 90) lists pole replacement as being "proactive" rather than "reactive".

- (a) Provide the estimated number of poles Hydro Ottawa expects to replace each year from 2015 through 2020.
- (b) Provide the expected average age per pole over the next 20 years in 5 year increments. Set out all assumptions used in arriving at the estimate.
- (c) Hydro Ottawa states that "The condition of poles is evaluated against a health index developed by HOL.... poles should be replaced once they fall below 60% of the required strength". In figure 2.2.14, Hydro Ottawa categorizes its poles according to pole condition: good, fair, poor and critical. Are the pole conditions determined based on the health index? If so, what percentage of strength corresponds with each category of pole condition?

Hydro Ottawa Limited EB-2015-0004 Allstream Inc. Interrogatories

Allstream-04

Ref: Exhibit H, Tab 7, Schedule 1, Page Specific Charges – Proposed New Charge: Pole Attachments; Decision and Order RP 2003-0249.

- (a) In assessing reasonableness of pole replacement costs, does Hydro Ottawa use benchmarks from other utilities? If not, why not?
- (b) Provide Hydro Ottawa's understanding of why its net embedded cost per pole should be more than three times as high as the basis for the current province-wide rate.