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September 11, 2015

**Our File Number: 72738**

Mr. Greg Van Dusen  
Interim Director – Regulatory Affairs  
Hydro Ottawa Holdings Inc.  
3025 Albion Road North  
P.O. Box 8700  
Ottawa, ON K1G 3S4

Via email

Dear Mr. Van Dusen:

**Re: Hydro Ottawa Limited**  
**Custom Incentive Rate Application EB-2015-0004**

We act as counsel to Hydro One Networks Inc. (Hydro One).

It has come to Hydro One's attention that certain Intervenor ("the Carriers") have sought production of Hydro One's reciprocal pole agreement with Hydro Ottawa Limited in the above noted proceeding. While Hydro One is not an intervenor in the above proceeding, it nonetheless hopes that the Board considers its position on the Carriers' request. I would kindly ask that you place Hydro One's position before the Board.

Hydro One has had an opportunity to review the submissions filed by Hydro Ottawa Limited dated September 3, 2015 and those of Bell dated September 10, 2015 outlining their respective positions why the documentation should not be produced in the above-noted proceeding. Hydro One is in complete agreement with those submissions and adopts and relies upon them.

In particular, Hydro One maintains that the agreements are not relevant. The Carriers attach to the communication space on any pole, while the agreement between Hydro One and Ottawa Hydro is in relation to the power space. The respective rates charged are entirely separate.

Hydro One also fully agrees that this appears to be a "fishing expedition" on the part of the Carriers. The Carriers have been well positioned to provide their own evidence relating to the appropriate joint use rate, without ever requiring access to the reciprocal agreements now being sought.

Additionally, the position expressed and outlined by Bell with respect to the commercially sensitive nature of the material, the negotiations that result in the agreement and the future impact on similar negotiations of a commercial nature are equally applicable to Hydro One. It is extremely important that negotiations with third parties remain confidential so that relationships can be preserved and maintained.

Hydro One is in agreement with Ottawa Hydro and Bell and also asks that the Board reject the requirement for Ottawa Hydro to either file the agreement or provide a summary of it.

We thank you for your consideration of this matter and kindly ask that you place Hydro One's position before the Board.

Yours very truly,



Anita M. Varjadic

/nb

c: Hydro One  
Hydro Ottawa Limited  
Intervenors