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March 23, 2016

**Our File Number: 72738**

Ms. Kirsten Walli  
Secretary  
Ontario Energy Board  
Suite 2700, 2300 Yonge Street  
P.O. Box 2319  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Hydro One Networks Inc.  
Motion for Review and Variance of Decision by Carriers EB-2015-0141**

As counsel for Hydro One Networks Inc. ("Hydro One"), we are in receipt of correspondence from Mr. Pinos, counsel for the Carriers, and Notice of Motion, both dated March 18, 2016.

The Carriers' motion seeks three items of relief:

- (1) Requesting an oral hearing in the above matter, contrary to the Board's decision on this issue outlined in Procedural Order No. 7;
- (2) Production of Hydro One's Agreements with Bell Canada regarding joint use and pole attachments, a request made and rejected in the Hydro Ottawa proceeding; and
- (3) Further interrogatories.

Hydro One opposes all of the relief sought by the Carriers. The Carriers' request for a review and variance of the OEB's decision in EB-2013-0416/EB-2014-0247 was commenced almost one year ago, via requests made on April 1, 2015. The Carriers have had sufficient opportunity to present their evidence and seek information and evidence from Hydro One during the interrogatory phase of this proceeding, a

meeting at their request at our office, a technical conference and a settlement conference. The matter has proceeded through the Board's usual regulatory process, now at the stage of final arguments.

It is Hydro One's position that it is unnecessary and inappropriate to re-open the interrogatory process and request additional productions at this stage as the Carriers have done. Moreover, Hydro One continues to be of the view that an oral hearing is not warranted. Either of these steps will only increase the costs of this proceeding.

Hydro One submits that the Board's generic proceeding currently underway to examine the pole attachment charge is the proper forum to further pursue the calculation of joint use rates for pole attachments.

Hydro One does acknowledge that the Board, in Procedural Order No. 7, instructed the parties to be mindful of the Board's decision on a similar issue involving Hydro Ottawa. While Hydro One does not believe that further interrogatories are necessary, there is some information not on the current record that would likely be required by the Board in order to make findings consistent with those in the Hydro Ottawa decision.

Hydro One is willing to provide this information, should the Board view that as necessary and appropriate in order to establish just and reasonable rates. This could be provided, with leave of the Board, in Hydro One's Argument in Chief.

If the Board requires anything further from Hydro One in respect of the Carriers' motion filed March 18, 2016, please do not hesitate to let us know.

Yours very truly,



Anita M. Varjadic

/nb

cc: Hydro One  
Intervenors