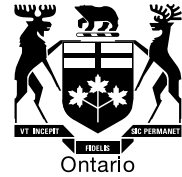


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BY E-MAIL

April 7, 2016

Board Secretary
Ontario Energy Board
2300 Yonge Street, Ste. 2701
Toronto ON M4P 1E4

Attention: Mr. John Pickernell, Applications Administration

Dear Mr. Pickernell:

**Re: Motion for Review and Variance of Decision
EB-2013-0416/EB-2014-0247
Board File Number EB-2015-0141
OEB Staff Interrogatories for Hydro One pursuant to Procedural
Order No. 8**

Please find attached the Supplementary Interrogatories from OEB staff for Hydro One pursuant to Procedural Order No. 8 issued on March 31, 2016.

Yours truly,

Original Signed By

Harold Thiessen
Ontario Energy Board Staff
Case Manager – EB-2015-0141

cc. All parties, EB-2015-0141

Motion for Review and Variance of Decision
EB-2013-0416/EB-2014-0247
OEB File Number EB-2015-0141
Supplementary OEB Staff Interrogatories for Hydro One pursuant to
Procedural Order No. 8

Supplementary OEB Staff - 1

- a) Please calculate the pole access charge in a manner you consider to be consistent with the decision of the OEB in EB-2015-0004 dated February 25, 2016, the Hydro Ottawa Ltd. Decision and Rate Order on Pole Attachment Charge. Where the calculation uses data not presently on the record in this proceeding, please state the source of the data and/or how the calculation was made.

In making the calculation, please apply the following:

- The actual number of attachers per pole should be used to reflect the specific circumstances of Hydro One.
- Historical costs should be used. Please provide a calculation using historical data for 2014 and 2015 (as the last complete historical year).
- No inflation adjustment for future years is to be made.
- The direct costs (as described in the Hydro Ottawa decision) should be determined on a per pole basis and then divided by the number of attachers per pole. Actual numbers of poles and attachers should be used.
- In calculating indirect costs, the net embedded cost per pole should be based on the historical year-end net book value.
- The pre-tax carrying cost of capital for the historical year is to be used.

If any of the above assumptions are considered by Hydro One to be inconsistent with the Hydro Ottawa decision referred to above, please explain the reasons for this belief, and provide the calculation with your preferred figures in addition to the method detailed above.

- b) Please indicate if loss in productivity costs are included in your calculation of the pole access charge provided in answer to 1a), and explain the reasons for this choice. In addition, please specifically confirm whether the cost of returning crews for pole replacement is included in this cost category. If included, please provide the calculation with the cost of returning crews for pole replacement removed.

- c) i) Please indicate if a reduction in the net embedded cost per pole for power-specific fixtures or assets has been made in the calculation. If yes, what percentage reduction has been used? What is the basis for this percentage, and how does the configuration of Hydro One's poles factor into the choice of percentage?
- ii) Please indicate by what percentage depreciation and pole maintenance expenses were reduced to account for power-specific assets.

Supplementary OEB Staff – 2

- a) Please indicate whether any of the costs being claimed by Hydro One in this proceeding are being recovered elsewhere, such as through reciprocal arrangements with Bell or other parties.
- b) Please indicate how the Bell attachments and any other attachments associated with reciprocal arrangements factor into the determination of the number of attachers per pole.

Supplementary OEB Staff – 3

In its letter to the OEB dated March 23, 2016, counsel to Hydro One stated that "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." Please provide any such information that is not already provided in the response to the previous questions.