



PUBLIC INTEREST ADVOCACY CENTRE
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April 8, 2016

VIA E-MAIL

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

Dear Ms. Walli:

**Re: EB-2015-0141 – Motion to Review & Vary EB-2013-0416/EB-2014-0247
Interrogatories of Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed the interrogatories of VECC in the above-noted proceeding.

Yours truly,

A handwritten signature in black ink, appearing to be 'Michael Janigan', written in a cursive style.

Michael Janigan
Counsel for VECC

cc. All Parties, EB-2015-0141

REQUESTOR NAME	VECC
INFORMATION REQUEST ROUND NO:	# 2
TO:	Hydro One Networks Inc. - Distribution
DATE:	April 8, 2016
CASE NO:	EB-2015-0141
APPLICATION NAME	Motion to Review and Vary EB-2013-0416/EB-2014-0247

Note: Numbering continues in sequence from VECC IR Round #1

VECC - #9

Reference: Undertaking - JT3
Technical Conference, January 12, 2016, pages 34, 36 and 39
VECC #5 c) & e)

- a) The first table in JT3 reports that there were 23,788 Telecom Service Poles in the Summer of 2015. Please confirm that this number is correct and that the correction discussed in the response and at the Technical Conference was to the value of 276,218 reported for Full Telecom Poles, which should be reduced by 21,327 to 254,891. If not confirmed please explain the nature of the correction.
- b) Please explain more fully why these Service Poles are only charged 75% of the full rate.
- c) Please confirm that full rate will be applied to these Service Poles as the agreements are renegotiated (per VECC #5 c)).
 - i. If yes, by what date does Hydro One expect all Service Poles will be paying the full rate?
 - ii. If not, what are Hydro One's intentions regarding the future charges for Service Poles.
- d) The response to VECC #5 e) indicated that all third party attachers paid for attachments to Hydro One's poles. Please confirm that, given the arrangements with Bell Canada (per JT3 and TC, page 39), this is incorrect.
- e) With respect to the 331,238 Bell Canada attachments that are not invoiced, please provide rationale for not charging for these attachments. In doing so please explain what is meant by the 60%/40% split and what benefits Hydro One receives from the arrangement that would compensate for not being paid the full rate for the Bell Canada attachments.

- f) Does Hydro One expect the current arrangement with Bell Canada regarding not invoicing for its attachments to continue or will these attachments be charged the full rate as agreements are renegotiated?

VECC - #10

Reference: Undertaking - JT3

Technical Conference, January 12, 2016, pages 36-37

VECC #5 b) & c)

Carriers #1 d)

- a) With respect to JT3, it is noted that adjusting the total (319,055) in the first table for the 21,327 double counted poles results in a revised total of 297,728 which differs from the total in the second table (297,498). Please confirm that this is because the two tables are based on pole counts taken at different points in time (i.e. Summer 2015 vs. December 2015). If not confirmed, please reconcile the difference.
- b) Please confirm that the total number of wireline attachments as of Summer 2015 was 628,966 (i.e. the 650,293 values shown less the 21,327 double counted service poles). If not, what were the total number of wireline telecom attachments (including Bell Canada) as of the Summer 2015.
- c) Please provide a corrected version of the first table based on counts as of the Summer of 2015.
- d) It is noted that the values used in the first table in JT3 total 650,293 (when Bell Canada attachments are included) which is equivalent to the number of wireline attachers reported in Carriers #1 d) for 2015. It is also noted that the total number of attachers used in VECC #5 b) (767,761) is equivalent to total number of attachers reported in Carriers #1 d) (i.e. 650,293+117,468). Please confirm that the data used in all three instances is from the same point in time (i.e. Summer 2015). If not, please explain the basis for values used in each case.
- e) During the Technical Conference (page 37) Hydro One claimed that the correction to the number of attachments (as provided in JT3) did not impact on the number of attachers per pole calculation set out in VECC # 5 b). Please explain more fully why this is the case and why the correction for the double counting doesn't reduce the 650,293 value used for wireline attachments to 628,966 and thereby reduce the total number of attachments that would be used in the calculation from 767,761 to 746,434 (i.e. 628,966 wireline attachments plus 117,468 other attachments)?
- f) Based on the responses to the foregoing questions, if required, please revise the response to VECCC #5 b) using corrected attachment values for the August 2015.

VECC - #11

Reference: VECC #5 b)
Carriers #1 d)

- a) Please confirm that the 767,761 value for number of attachments used in VECC #5 b) to determine the number of attachers per pole includes both attachments in the communications space and non-Hydro One attachments in the power space.
- b) Please confirm that there were 15,609 non-Hydro One attachments in the power space (per Carriers #1 d)) in August 2015.
- c) Please explain why (per Carriers #1 d)) Streetlights only pay \$2.04 per attachment as opposed to the full rate. As part of the explanation, please indicate whether Hydro One expects Streetlights will continue to pay a lower rate or whether they will be charged the full rate at some future date? If the later, when?

VECC - #12

Reference: EB-2015-0004, Undertaking J2.1
EB-2015-0004, OEB Decision and Rate Order on Pole Attachment Charge, pages 6-8
EB-2015-0004, OEB Decision and Rate Order on Pole Attachment Charge, page 14
VECC # 5 b)

Preamble: It is noted that in the Board's EB-2015-0004 Decision regarding Hydro Ottawa's pole attachment rate the Board used the number of "full rate equivalent attachers" as the basis for calculating the number of attachers per pole (see page 8 and the referenced Undertaking J2.1).

At page 14 of its EB-2015-0004 Decision, the Board references the formula for determining the allocation factor (see Footnote #37).

- a) Based on the data from August 2015 please provide a table similar to Table 1 in Undertaking J2.1 from EB-2015-0004 that calculates the number of "full rate equivalent attachers" as applicable to Hydro One.
- b) Using the results from part (a) please re-calculate:
 - i. The total number of "full rate equivalent" attachers per pole as of August 2015 (including non-Hydro One attachers in the power space).
 - ii. The total number of non-power "full rate equivalent" attachers (i.e., those that would typically use the communications space) per pole as of August 2015.

- c) If sufficient data is not available from August 2015 to perform the calculations, please provide schedules with similar calculations for the number of equivalent rate attachments and attachers per pole using a more recent data set.
- d) Using the results from parts a) – c) and the allocation factor formula referenced by the Board in its EB-2015-0004 Decision, please re-calculate the space allocation factor, providing the supporting details to the calculation.

VECC - #13

Reference: Technical Conference, January 12, 2016, pages 46-47

- a) Please provide more details on the basis for the 3%/annum historic inflation rate used to escalate the administration and loss of productivity costs and how it was established.

VECC - #14

Reference: Technical Conference, January 12, 2016, pages 43-44
Carriers #8 e)

- a) The response to Carriers #8 e) indicated that maintenance costs associated with power-only assets were not excluded from the calculation. However, during Technical Conference Mr. Boldt indicated they were excluded. Please reconcile and confirm which statement is correct.

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