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April 25, 2018

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: EB-2017-0049
Hydro One Networks Inc. application for electricity distribution rates beginning
January 1, 2018 until December 31, 2022

We are counsel to Anwaatin Inc. (**Anwaatin**) in the above-mentioned proceeding. Please find enclosed Anwaatin's written interrogatories on the evidence of Ontario Energy Board Staff, submitted pursuant to Procedural Order No. 5.

Yours very truly,

A handwritten signature in black ink, consisting of a large, stylized 'L' followed by a horizontal stroke that curves upwards and to the right.

Lisa (Elisabeth) DeMarco

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15 (Sched. B);

AND IN THE MATTER OF an Application by Hydro One Networks Inc. (**Hydro One**) for electricity distribution rates beginning January 1, 2018, until December 31, 2022 (the **Application**).

EB-2017-0049

**Interrogatories From
Anwaatin Inc. (Anwaatin)**

April 25, 2018

Question: **Anwaatin-1**

Reference: • Exhibit M1, pages 2 and 8

- a) What are the capital expenditure and operation, maintenance, and administration (**OM&A**) assumptions that you have used in assessing the total factor productivity (TFP) trend? Specifically, have you assessed traditional "wires" capital expenditures or made any accommodation for "non-wires" (distributed energy resources (**DERs**)) alternatives capital expenditures? If you have assumed "non-wires" capital expenditures, what discount rate(s) relative to "wires"-related capital expenditures have you assumed?

Question: **Anwaatin-2**

Reference: • Exhibit M1, pages 25–26

- a) How have DERs and "non-wires" alternatives (each of storage, solar, and conservation) been classified for ratemaking purposes under the econometric model used by Pacific Economics Group Research, LLC. Please advise whether each of these investments in "non-wires" alternatives would be classified as:
- (i) capital expenditures;
 - (ii) OM&A expenditures; or
 - (iii) otherwise treated for ratemaking purposes.

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS

25th day of April, 2018



Lisa (Elisabeth) DeMarco
DeMarco Allan LLP
Counsel for Anwaatin