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June 7, 2019

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

Dear Ms. Walli,

RE: EB-2019-0120 – Hydro One Networks Inc. Allocation of Construction Costs of the Supply to Essex County Transmission Reinforcement Project – Interrogatories of the London Property Management Association

Please find attached the interrogatories of the London Property Management Association in the above noted proceeding.

Yours very truly,

Randy Aiken

Randy Aiken
Aiken & Associates

c.c. Joanne Richardson, Hydro One

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HYDRO ONE NETWORKS INC.

**Application for Approval of the Allocation of
Construction Costs of the Supply to Essex County
Transmission Reinforcement Project**

**INTERROGATORIES OF THE
LONDON PROPERTY MANAGEMENT ASSOCIATION**

All interrogatories are based on the letter from Hydro One Networks Inc. related to *EB-2013-0421 – Hydro One Networks Inc.’s Section 92 – Request for Approval on Attribution of Cost* dated February 28, 2019, the IESO’s letter to the Ontario Energy Board dated April 26, 2019 related to IESO confirmation and the EB-2013-0421 application and Decision and Order dated July 16, 2015.

Interrogatory #1

Please file tables, similar to that found in Tables 1 & 2 of Exhibit B, Tab 4, Schedule 2 that shows a break down of the total cumulative costs of \$74.8 in the same level of detail as shown in the above noted tables.

Interrogatory #2

a) How has Hydro One Networks Inc. estimated the \$2 million reduction noted in footnote 1 of the February 28, 2019 letter?

b) Did Hydro One Networks Inc. do any independent verification of the \$2 million cost that was provided by the OPA in the OPA Cost Responsibility Evidence provided at Exhibit B, Tab 4, Schedule 4 in EB-2013-0421?

Interrogatory #3

a) Please confirm that the costs shown in the table provided in the February 28, 2019 letter include actual costs of \$54.3 million for the SECTR Project and an estimated cost of \$20.5 million to the network pool that would have been required. If this cannot be confirmed, please explain fully.

b) Please provide a table similar to that provided in the February 28, 2019 letter that uses the costs as provided and approved in EB-2013-0421 to determine the attribution of costs between the triggering customer and the network pool.

c) Please confirm that the costs requested in part (b) above were all forecasted/estimated costs. If this cannot be confirmed, please explain fully.