



August 21, 2015

By Same Day Courier

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

Attention: Kirsten Walli, Board Secretary
Harold Thiessen, Case Manager
Jennifer Lea, Board Co-Counsel
Ian Richler, Board Co-Counsel

TIMOTHY PINOS

 Certified as a
Specialist
in Civil Litigation

tpinos@casselsbrock.com
tel: 416.869.5784
fax: 416.350.6903
file # 035401-00036

Dear Sir/Madam:

**Re: OEB File: EB-2015-0141 – Motion for Review and Variance of Decision
EB-2013-0416/EB 2014-0247**

Please find enclosed, two copies of the written interrogatories of the Carriers to Hydro One, pursuant to the OEB's Procedural Order No. 3 dated July 29, 2015.

Yours very truly,

Timothy Pinos
TP/CS/gmc
Enclosures

Ontario Energy Board

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

AND IN THE MATTER OF Decision EB-2013-0416/EB-2014-0247 of the Ontario Energy Board (the “**OEB**”) issued March 12, 2015 approving distribution rates and charges for Hydro One Networks Inc. (“**Hydro One**”) for 2015 through 2017, including an increase to the Joint Use Pole Access Charge;

AND IN THE MATTER OF the Decision of the OEB issued April 17, 2015 setting the Joint Use Pole Access Rate as interim rather than final;

AND IN THE MATTER OF the Decision and Order issued June 30, 2015 by the OEB granting party status to Rogers Communications Partnership, Allstream Inc., Shaw Communications Inc., Cogeco Cable Inc., on behalf of itself and its affiliate, Cogeco Cable Canada LP, Quebecor Media, Bragg Communications, Packet-tel Corp., Niagara Regional Broadband Network, Tbaytel, Independent Telecommunications Providers Association and Canadian Cable Systems Alliance Inc. (collectively, the “**Carriers**”);

AND IN THE MATTER OF Procedural Order No. 3 of the OEB issued July 29, 2015 setting dates for, *inter alia*, interrogatories of the parties.

Interrogatories of the Carriers to Hydro One

August 21, 2015

I. Definitions

For the purpose of these interrogatories:

- (a) **“Attachers”** means Wireline Attachers, Wireless Attachers and Other Attachers;
- (b) **“Wireline Attachers”** means entities that attach wireline communications facilities within the communications space of a Joint Use Pole and include, without limitation, telecommunications service providers, broadcasting distribution undertakings, municipal corporations and electricity generation, transmission and distribution undertakings;
- (c) **“Wireline Attachments”** means the facilities that Wireline Attachers install within the communications space on a Joint Use Pole;
- (d) **“Wireless Attachers”** means those entities that attach wireless communications facilities on a Joint Use Pole;
- (e) **“Wireless Attachments”** means the facilities that Wireless Attachers install on a Joint Use Pole;
- (f) **“Other Attachers”** means parties other than Wireline and Wireless Attachers that attach facilities to a Joint Use Pole;
- (g) **“Other Attachments”** means the facilities that Other Attachers install on a Joint Use Pole and includes, for example, streetlights, traffic signals, signs, banners, flower pots;
- (h) **“Joint Use Poles”** refers to those joint use poles owned by Hydro One with a dedicated communications space that is occupied, or is available for occupation, by Wireline Attachers;
- (i) **“Pole Attachment Fee”** means the annual fee an Attacher pays to Hydro One for the right to install its Attachment on and to occupy a Joint Use Pole; and
- (j) **“Single Use Poles”** means Hydro One poles that cannot or are not designed to accommodate Wireline Attachments.

II. Attachers and Attachments

Carriers-01

Ref: *Exhibit G2, Tab 5, Schedule 1, p.31 of 40 (referred to herein as “Exhibit G2-5-1”)*

- (a) Provide a list of the names of the Wireline Attachers that currently have Wireline Attachments on one or more Joint Use Poles. For each Wireline Attacher, indicate whether or not it pays the current OEB-approved Pole Attachment Fee of \$22.35 for all of its Wireline Attachments. If not, indicate what Pole Attachment Fee or other compensation, if any, it pays to Hydro One for its Wireline Attachments.
- (b) Provide a list of the names of Wireless Attachers that currently have Wireless Attachments on one or more Joint Use Poles. For each Wireless Attacher, indicate what Pole Attachment Fee or other compensation, if any, it pays to Hydro One for its Wireless Attachments.
- (c) Provide a list of the names of Other Attachers that currently have Other Attachments on one or more Joint Use Poles. For each Other Attacher, describe the types of Other Attachments it has installed and indicate what Pole Attachment Fee or other compensation, if any, it pays for its Other Attachments. If Hydro One does not track this information, please explain why, and, in any event, indicate what Pole Attachment Fee each Other Attacher pays to Hydro One.
- (d) Complete the table below with respect to revenues from Attachments to Joint Use Poles for each of the years 2012 to 2015 (i.e., actual revenues for 2012-14 and estimates for 2015). If there is a range of different Pole Attachment Fees for Other Attachers, then provide the revenues derived therefrom.

Table 1

	2012	2013	2014	2015
Wireline Attachments				
No. of Wireline Attachers				
No. of Wireline Attachments				
Pole Attachment Fee	\$22.35	\$22.35	\$37.05	\$37.42
Gross Revenues from Pole Attachment Fees (\$000)				
Wireless Attachments				
No. of Wireless Attachers				
No. of Wireless Attachments				

	2012	2013	2014	2015
Pole Attachment Fee				
Gross Revenues from Pole Attachment Fees (\$000)				
Other Attachments				
No. of Other Attachers				
No. of Other Attachments				
Pole Attachment Fee				
Gross Revenues from Pole Attachment Fees (\$000)				

- (e) Please describe the kinds of Attachments and Attachers for which there is no Pole Attachment Fee payable. For each such kind of Attachment, explain why this is the case. For each kind of Attacher that does not pay a Pole Attachment Fee, explain why this is the case.
- (f) Do you agree with the statement, “The owner of a joint-use pole should be entitled to recover the direct and indirect costs it incurs from third parties who use and occupy that pole”?
- (g) Please confirm that the revenues, if any, derived from any Pole Attachment Fees in respect of Wireless Attachments and Other Attachments have not been considered or taken into account in Hydro One’s calculations for its proposed Wireline Pole Attachment Fee. If this is not the case, please explain how such revenues have been used in the calculations.
- (h) On January 16, 2015, Hydro One provided its comments in respect of the Board’s December 11, 2014 Memorandum seeking comments on whether all electricity distributors should be able to charge market rates for Wireless Attachments (EB-2014-0365 - *Wireless Attachment Consultation*). In its comments, Hydro One stated that, while it supported this initiative, it wanted the flexibility to choose between implementing market rates or continuing with Board-approved cost-based rates, noting that regulated rates would be provide the most efficient and fair solution for areas with few, if any “competitors” to the local utilities for Attachments.
- (i) Of the total population of Joint Use Poles, what percentage would Hydro One estimate would fall in areas with few, if any competitors to the local utilities for Attachments?

- (ii) Of the Wireless Attachments currently installed on Joint Use Poles, how many would Hydro One estimate fall in areas with few, if any competitors to the local utilities for Attachments?
- (i) Explain whether the Pole Attachment Fee for Wireline Attachers proposed by Hydro One will apply to:
 - (i) Wireless Attachments;
 - (ii) Other Attachers; or
 - (iii) poles operated or controlled by Hydro One but owned by third parties.

If it does not apply to any of above, provide the rates and charges that will apply.

- (j) Has Hydro One installed any of its own Attachments or equipment within the communications space of the Joint Use Poles? If so, how many Joint Use Poles have such Attachments and describe the type of Attachments, as well as their purpose or service provided from those Attachments.
- (k) What Pole Attachment Fee does Hydro One charge a Wireline Attacher to “overlash” its facilities to the Wireline Attachment of different Wireline Attacher (an “**Overlash Attachment**”)?
- (l) Does the table in (d) include Overlash Attachments? Complete the table below with respect to revenues from Overlash Attachments to Joint Use Poles for each of the years 2012 to 2015 (i.e., actual revenues for 2012-14 and estimates for 2015).

Table 2

	2012	2013	2014	2015
Overlash Attachments				
No. of Overlash Attachers				
No. of Overlash Attachments				
Pole Attachment Fee				
Gross Revenues from Pole Attachment Fees (\$000)				

- (m) Is Hydro One aware of any plans by any entity which would significantly increase the number of Attachments on the Joint Use Poles (such as, for example, the recently announced plan by Bell Canada to install new fibre facilities on 80,000 poles in Toronto)? If so, please describe the plan and how many Joint Use Poles may be affected.

Carriers-02

- (a) Does Hydro One currently have a joint use agreement or agreements with Bell Canada under which each party has reciprocal access to the poles owned by the other? If yes, please provide a copy of such agreement(s).
- (b) Does Bell Canada pay Hydro One the OEB-approved Pole Attachment Fee of \$22.35 for its Wireline Attachments? If not, what compensation or other consideration does Bell Canada provide to Hydro One for its Wireline Attachments?
- (c) Will the proposed Pole Attachment Fee apply to Bell Canada and its Wireline Attachments? If not, what fee will apply?
- (d) Does Hydro One provide any services to Bell Canada for work done on Bell Canada poles (e.g., pole replacement, pole straightening, wires down, trees on wire, maintenance related to vegetation, storm or emergency repairs)? If yes, provide the rates and amounts received by Hydro One for any such work and indicate whether the amounts received fully recover its costs for performing such work.
- (e) Does Hydro One provide any administrative services to Bell Canada in relation to Bell Canada poles (e.g., processing permit applications, GIS and inventory, invoicing)? If yes, provide the rates and amounts received by Hydro One for any such work and indicate whether the amounts received fully recover its costs for performing such work.
- (f) Does Bell Canada provide any services to Hydro One for work it performs on Joint Use Poles (e.g., pole replacement, pole straightening, wires down, trees on wire maintenance related to vegetation, storm or emergency repairs)? If yes, provide the rates and amounts received by Bell Canada for such work for each of the years 2010-2015 (actual amounts for 2010-2014 and estimates for 2015).
- (g) Does Bell Canada provide any administrative services to Hydro One in relation to Joint Use Poles (e.g., processing permit applications, GIS and inventory, invoicing)? If yes, provide the rates and amounts received by Bell Canada for such work for each of the years 2010-2015 (actual amounts for 2010-2014 and estimates for 2015).
- (h) Does Hydro One have any joint use agreements with any third party other than Bell Canada that provide for reciprocal access to one another's poles? If yes, please respond to the questions and provide the information requested in (a) to (e), replacing "Bell Canada" with any such third party.

III. Allocation Factor

Carriers-03

Ref: *Exhibit G2-5-1 - Allocation factor of 21.9%.*

- (a) Confirm that Hydro One has used an average of 2.5 Wireline Attachers per Joint Use Pole to generate an allocation factor of 21.9%. If not, please provide Hydro One's average or assumption respecting the number of Wireline Attachers per Joint Use Pole.
- (b) Has Hydro One conducted any studies or surveys or used the results of studies or surveys by others to calculate the average number of Wireline Attachers per Joint Use Pole? If so please provide a description of the studies or surveys used or taken into consideration, and copies of same.
- (c) Confirm that, under Hydro One's methodology, Wireline Attachers would contribute 54.8% of the common costs of a pole while Hydro One would contribute 45.2%.
- (d) Confirm that Hydro One has used the following dimensions (in feet) for the various spaces on a Joint Use Pole to generate an allocation factor of 21.9%. If not provide details of the dimensions used and their basis.

Table 3

Space on Joint Use Pole	Length in feet
Buried Portion	6.00
Clearance Space	17.25
Communications Space	2.00
Separation Space	3.25
Power Space	11.50
Total length of Joint Use Pole	40.00

- (e) Indicate whether power facilities, such as transformers, ever encroach on, or are attached within, the separation space on the Joint Use Poles.
- (f) Provide all steps in the calculation and all data inputs used to determine the allocation factor of 21.9%. Include all supporting evidence, assumptions and calculations employed otherwise not requested in (a) to (e).

IV. Average Embedded Cost and Net Embedded Cost

Carriers-04

Ref: Exhibit G2-5-1 – 2015 Net Embedded Cost of \$745.86 per pole.

- (a) Identify the number of poles used to calculate the per pole cost in each of the lines in Table 16 of Exhibit G2-5-1 (“**Table 16**”) (for the years 2012 to 2019 inclusive). Furthermore, identify the source of the number of poles used in each line of the calculation and explain why the number of poles used in each line is relevant to the calculation.
- (b) Explain whether Hydro One used year-end number of poles or average number of poles for each year in each line of Table 16 and, if year-end number of poles were used, explain why average number of poles for each year was not used.
- (c) For each of the years 2010-2015, provide Hydro One’s Average Embedded Cost per pole (actual cost for 2010-2014 and estimates for 2015). Identify the categories, descriptions and values of all asset accounts (both aggregate and sub-accounts) used to determine the Average Embedded Cost, as well as the total number of poles and types of poles (e.g., Joint Use Poles, Single Use Poles, other types of poles) used to determine a per Joint Use Pole cost.
- (d) For each of the years 2010-2015, provide Hydro One’s Net Embedded Cost per pole (actual cost for 2010-2014 and estimates for 2015). Identify the categories, descriptions and values of all asset accounts (both aggregate and sub-accounts) used, as well as the total number of poles and types of poles (e.g., Joint Use Poles, Single Use Poles, other types of poles) used.
- (e) Describe in detail the methodology, including applicable cost inputs, that was used to determine a Net Embedded Cost per pole of **\$745.86** as at Table 16. Confirm whether the Net Embedded Cost per pole of **\$745.86** includes power-specific or power-only fixtures or assets (Account # 1830 from the Board's Accounting Procedures Handbook for Electricity Distributors (“**APH**”)). If the cost of such fixtures and assets are excluded, explain how the costs were identified and, if a factor was used, identify that factor. If the cost of such power fixtures and assets are included, explain the rationale for their inclusion. Include all supporting evidence, assumptions and calculations employed.
- (f) Confirm whether the Average Embedded Cost per pole and the Net Embedded Cost per pole of **\$745.86** used to calculate the proposed Pole Attachment Fee include Hydro One’s ongoing costs of pole replacement.
- (g) For fiscal year ends 2012 and 2013, separately identify each of the following:
 - (i) gross assets;

- (ii) accumulated depreciation;
 - (iii) net assets; and
 - (iv) depreciation expense.
- (h) For the fiscal years 2014 to 2019, separately identify each of the following:
- (i) gross book value;
 - (ii) accumulated depreciation; and
 - (iii) depreciation expense.
- (i) Confirm that the Net Embedded Cost per pole of **\$745.86** is based on the net book value of the "Poles, Towers & Fixtures" (Account # 1830 from the APH). If not, identify the source and derivation of the Net Embedded Cost.
- (j) Confirm whether any costs associated with the replacement of Joint Use Poles has been included in the Net Embedded Cost per pole of **\$745.86**.
- (k) Reconcile the Net Embedded Cost per pole of **\$745.86** with the net book value of the "Poles, Towers & Fixtures" (Account # 1830 from the APH) or other source. Provide all calculations and source references to enable replication of the calculations.
- (l) Provide the amounts from each of the following accounts used to determine the Net Embedded Cost of **\$745.86**.

Table 4

1830	Joint Use Poles, Towers and Fixtures
1830-3	Joint Use Poles, Towers and Fixtures - Subtransmission Bulk Delivery
1830-4	Joint Use Poles, Towers and Fixtures – Primary
1830-5	Joint Use Poles, Towers and Fixtures – Secondary
1835	Overhead Conductors and Devices
1835-3	Overhead Conductors and Devices - Subtransmission Bulk Delivery
1835-4	Overhead Conductors and Devices – Primary
1835-5	Overhead Conductors and Devices – Secondary
1840	Underground Conduit
1840-3	Underground Conduit - Bulk Delivery
1840-4	Underground Conduit – Primary
1840-5	Underground Conduit – Secondary
1845	Underground Conductors and Devices
1845-3	Underground Conductors and Devices - Bulk Delivery
1845-4	Underground Conductors and Devices – Primary
1845-5	Underground Conductors and Devices – Secondary
1850	Line Transformers
1855	Services
1860	Meters

V. Depreciation

Carriers-05

Ref: Exhibit G2-5-1 – 2015 depreciation expense of \$12.68 for per pole.

- (a) Reconcile the Depreciation Expense per pole of **\$12.68** with the Depreciation and Amortization evidence filed or adduced in EB-2013-0416, providing specific reference to the passages in the evidence referred to. Identify the year and provide all calculations used to perform the reconciliation.
- (b) For each of the years 2010-2015, provide Hydro One's Depreciation Expense per pole (actual amount for 2010-2014 and estimates for 2015). Identify the categories, descriptions and values of all asset accounts (both aggregate and sub-accounts) used to determine the Depreciation Expense per pole, as well as the total number of poles used to determine a per pole cost, if applicable.
- (c) Describe in detail the methodology, including applicable cost inputs, that was used to determine the Depreciation Expense per pole of **\$12.68**. Describe the manner in which the costs of power-specific or power-only assets were excluded from the calculation. Include all supporting evidence, assumptions and calculations employed.

Carriers-06

- (a) Is the expected life of a Joint Use Pole 45 years? If not, provide the expected life of such Joint Use Poles and indicate why it differs from 45 years. Provide any evidence to support such expected life.
- (b) Provide the number of Joint Use Poles that are currently at or near end-of-life.
- (c) Provide the number of Joint Use Poles that remain in use and are fully depreciated. Indicate whether or not these poles have been included in the count of poles used to determine the net embedded cost per pole and the depreciation expense per pole.
- (d) Provide the number of Joint Use Poles that have been, or will be replaced, in 2015 pursuant to: (i) a proactive replacement program; (ii) another capital program. Identify the nature of the capital program(s) for these replacements.
- (e) Complete the table below with respect to Joint Use Poles replaced as part of a proactive replacement program.

Table 5

	2010	2011	2012	2013	2014
Number of poles replaced					
Percentage of poles replaced					
Percentage of poles replaced that are beyond their expected life					

- (f) Complete the following table.

Table 6

	2015	2016	2017	2018	2019
Number of poles to be replaced					
Number of poles to be replaced that are beyond their expected life					

- (g) Is it Hydro One's practice to automatically replace all poles that are older than their expected useful life?

VI. Capital Carrying Cost

Carriers-07

Ref: *Exhibit G2-5-1 - 2015 Capital Carrying Cost of \$63.32 per pole.*

- (a) Confirm whether or not the Capital Carrying Cost of **\$63.32** per pole is based on a weighted average cost of capital of 8.49%. If not, identify the weighted average cost of capital that was used. Explain in detail why 8.49% or some other weighted average cost of capital has been used.
- (b) Reconcile the Capital Carrying Cost of **\$63.32** per pole with Capital Cost evidence filed or adduced in EB-2013-0416, providing specific reference to the passages in the evidence referred to. Identify the year and provide all calculations used to perform the reconciliation used for the calculation of the Capital Carrying Costs per pole of **\$63.32**.
- (c) Identify the cost of capital used to calculate the Capital Carrying Cost and provide an EB-2013-0416 proceeding reference to the calculation of the cost of capital. If the cost of capital used to calculate the proposed Pole Attachment Fee is not equal to the cost of capital used in the EB-2013-0416 proceeding to determine electricity rates, provide an explanation for the difference.

VII. Pole Maintenance

Carriers-08

Ref: *Exhibit G2-5-1 – 2015 Maintenance (L&F) costs of \$82.41 per pole.*

- (a) Provide a detailed description of all activities undertaken as part of “*Maintenance (L&F) Costs*”, including the tasks performed, the employee categories involved, the hourly wages, vehicle costs and time required to complete each task.
- (b) Provide a detailed description of the methodology, assumptions and all data inputs (and data sources), including the number of poles, used to generate *Maintenance (L&F) Costs* of **\$82.41** per pole.
- (c) Complete the table below with respect to the *Maintenance (L&F) Costs* for each of the years 2010 to 2015 for each maintenance activity (expanding the table as necessary to include each activity), using actuals for 2010-2014 and estimates for 2015. Provide the sources and supporting data for the values used to populate the table.

Table 7

	2010	2011	2012	2013	2014	2015
Activity 1						
Activity 2						
Activity 3						
Activity 4						
Total (L&F) Maintenance Costs						
Number of poles						
Maintenance (L&F) Costs per pole						

- (d) Is **\$82.41** based on historical data or a forecast budget? If it is based on historical data, describe the time period over which the data was collected.
- (e) Indicate whether costs that are attributable to power-only assets were excluded from the calculation of *Maintenance (L&F) Costs* of **\$82.41**. If yes, explain and demonstrate how these costs were excluded. Indicate whether the costs of maintaining Single Use Poles were excluded from the same calculation. If yes, explain and demonstrate how these costs were so excluded. In both cases, provide the methodology, assumptions and calculations used.

- (f) Indicate whether tree trimming or vegetation management costs are included in the *Maintenance (L&F) Costs*. If yes, confirm that Wireline Attachers are required to perform their own tree trimming or pay separately for tree trimming or vegetation management in respect of their Wireline Attachments. Provide all amounts paid to Hydro One by third parties for tree trimming or vegetation management for each year from 2010 to 2015.
- (g) For each year from to 2010 to 2015, provide all amounts paid to Hydro One by third parties for any activities included in *Maintenance (L&F) Costs* (excluding tree trimming or vegetation management) for each year from 2010 to 2015.

VIII. Administration Cost

Carriers-09

Ref: *Exhibit G2-5-1 – 2015 “Admin” costs of \$0.85 per pole.*

- (a) Provide a detailed description of all activities undertaken as part of “*Administration Costs*”, including the tasks performed, the employee categories involved, the hourly wages, vehicle costs and time required to complete each task.
- (b) Provide the calculation used to determine the *Administration Costs* of **\$0.85** per pole. Confirm that the *Administration Costs* of **\$0.85** per pole was determined by dividing the total *Administration Costs* per pole by the average number of Wireline Attachers. For example, if one were to use an average of 2.5 Wireline Attachers, then the total *Administration Costs* per pole would be \$2.13, which would yield *Administration Costs* of **\$0.85** to be paid by each of the 2.5 Wireline Attachers. If this is not the case, please explain why.
- (c) Indicate whether or not the *Administration Costs* stated are in respect of only Joint Use Poles with one or more Wireline Attachments.
- (d) Complete the table below with respect to the *Administration Costs* for each of the years 2010 to 2015 for each administration activity (expanding the table as necessary to include each activity), using actuals for 2010-2014 and estimates for 2015. Provide the sources and supporting data for the values used to populate the table.

Table 8

	2010	2011	2012	2013	2014	2015
Activity 1						
Activity 2						
Activity 3						

	2010	2011	2012	2013	2014	2015
Total Admin Costs						
# of poles used in calculation						
Admin Costs per pole						

IX. Loss of Productivity Cost

Carriers-10

Ref: *Exhibit G2-5-1 – 2015 Loss of Productivity costs of \$1.53 per pole.*

- (a) Please describe in detail the activities that are included in the *Loss of Productivity Costs*, including:
- (i) the tasks performed;
 - (ii) how the tasks performed are directly related to the presence of Wireline Attachments on the Joint Use Poles;
 - (iii) the number of incidents reported requiring such task to be performed;
 - (iv) the time spent performing such tasks; and
 - (v) the types and categories of employees involved and the associated hourly wages.
- (b) Describe in detail the methodology, data sources and data inputs used to determine the *Loss of Productivity Costs*, including but not limited to the number of hours of labour (and corresponding rates) identified for these activities.
- (c) Provide the calculation used to determine the *Loss of Productivity Costs* of **\$1.53** per pole. Confirm that the *Loss of Productivity Costs* of **\$1.53** per pole was determined by dividing the total *Loss of Productivity Costs* per pole by the average number of Wireline Attachers. For example, if one were to assume an average of 2.5 Wireline Attachers per pole, then the total *Loss of Productivity Costs* per pole would be \$3.83, which would yield *Loss of Productivity Costs* of **\$1.53** to be paid by each of the 2.5 Wireline Attachers. If this is not the case, please explain why.
- (d) Complete the table below with respect to the *Loss of Productivity Costs* for each of the years 2010 to 2015 for each activity (expanding the table as necessary to include each activity), using actuals for 2010-2014 and estimates for 2015. Provide the sources and supporting data for the values used to populate the table.

Table 9

Loss of Productivity Costs	2010	2011	2012	2013	2014	2015
Activity 1						
Activity 2						
Activity 3						
Activity 4						
Activity 5						
# of poles affected						
Total Costs per pole						

Carriers-11

- (a) Do the costs for pole replacement and the number of Joint Use Poles replaced include Joint Use Poles for which Hydro One received payment to replace (e.g., customer-requested replacements or relocations, make ready work to accommodate Wireline Attachers)? If so, provide the amount of revenues received and the corresponding number of Joint Use Poles replaced for each of the years indicated in the table above.
- (b) Provide a detailed description of the differences in crew, equipment, time and number of visits required to complete pole replacements of Single Use Poles or poles without Wireline Attachments as compared to Joint Use Poles with Wireline Attachments.
- (c) Confirm that it is Hydro One’s practice to replace a group of Joint Use Poles within a given area (e.g., on the same street or within the same neighbourhood) at the same time rather than replacing each Joint Use Pole in that area individually at separate times.

X. Process for Attaching to Joint Use Poles (Applications, Permits)

Carriers-12

- (a) Provide a detailed description of the process, including all steps involved, for a Wireline Attacher to receive approval to install:
 - (i) its first Wireline Attachment on a Joint Use Pole; and
 - (ii) each subsequent Wireline Attachment.
- (b) Further to response (a), provide copies of all forms, permit applications or similar documents that Hydro One requires Wireline Attachers to complete.

- (c) Does Hydro One charge a Wireline Attacher a separate fee to review and process applications, and issue permits, to install a Wireline Attachment on a Joint Use Pole?
- (d) If the answer to (c) is “yes”, (i) what is the current value of that fee for each permit application and (ii) provide the total annual revenues received in respect of such permit fees for each of the years 2010 through 2014, and estimated for 2015.

Carriers-13

- (a) Are Wireless Attachers required to obtain a permit to install their Wireless Attachments on Joint Use Poles? Does Hydro One charge a separate fee to review and process applications, and issue permits for Wireless Attachments?
- (b) Are Other Attachers required to obtain a permit to install their Wireless Attachments on Joint Use Poles? Does Hydro One charge a separate fee to review and process applications, and issue permits for Other Attachments?

Carriers-14

- (a) Confirm that a request from a Wireline Attacher to install Wireline Attachments on a Joint Use Pole is subject to that Joint Use Pole having sufficient space or structural integrity (*i.e.*, spare capacity). Is the determination of whether there is spare capacity on a Joint Use Pole made solely by Hydro One? If not, please identify any other party that may participate in the determination of whether there is spare capacity on a Joint Use Pole.
- (b) If no spare capacity is available for the Wireline Attachment, confirm that there is a process by which Hydro One will modify or replace the Joint Use Pole to accommodate the Wireline Attachment, subject to the Wireline Attacher paying for the costs associated with such work (“**Make-ready Work**”). Confirm whether any portion of the payments Hydro One receives from Wireline Attachers for Make-ready Work is included in the Average Embedded Cost and Net Embedded Cost of a Joint Use Pole used for the proposed Pole Attachment Fee.
- (c) Further to (b), provide the total annual payments received from Wireline Attachers for Make-ready Work for each of the years 2010 through 2014, and estimated for 2015.

XI. Methodology

Carriers-15

Ref: *Exhibit G2-5-1*

- (a) Explain whether Hydro One relied on financial information derived in accordance with the Board's APH to calculate the proposed 2015 Pole Attachment Fee of \$37.05. If a different source of financial information was used, identify the source and explain why the APH was not used.
- (b) Identify the source of the financial information from the EB-2013-0416 proceeding used to determine Net Embedded Cost, Depreciation, Maintenance (L&F), Allocated Capital Cost, Loss of Productivity and Administration.
- (c) Hydro One states that the proposed Pole Attachment Fee was determined by using "the OEB approved methodology for 2015 and increasing the rate by 1% for each year 2016 to 2019". Confirm that 2015 financial information was used to calculate the proposed 2015 pole attachment costs. If 2015 financial information was not used to calculate the pole attachment costs in Table 16:
 - (i) identify the year that was used; and
 - (ii) provide answers to the questions in (a) and (b) for the year used to calculate the pole attachment costs in Table 16.