



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

November 30, 2015

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 for Review and Variance of
Decision 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 regarding the evidence prepared by Mr. Michael Piaskoski on behalf of the Carriers.

Yours truly,

Michael Janigan
Counsel for VECC

Cc: The Carriers - Timothy Pinos - tpinos@casselsbrock.com
All Parties

REQUESTOR NAME	VECC
INFORMATION REQUEST ROUND NO:	# 1
TO:	The Carriers
DATE:	November 30, 2015
CASE NO:	EB-2015-0141
APPLICATION NAME	Motion for Review and Vary of Decision EB-2013-0416/EB-2014-0247

VECC-1

Reference: Evidence of Michael Piaskoski, paragraph 4

Preamble: The evidence states:

“The Carriers have reviewed the evidence of Hydro One with respect to the costing inputs of the proposed Pole Access Charge and, with the exception of the calculations of pole maintenance costs, are of the view that Hydro One has calculated the Pole Access Charge in accordance with the OEB Approved Methodology, and do not intend to challenge these other cost inputs and factors submitted by Hydro One in its evidence.”

1.1 Is it also Mr. Piaskoski’s view that, with the exception of the calculations of the pole maintenance costs, Hydro One has calculated the Pole Access Charge in accordance with the OEB Approved Methodology?

1.1.1 If not, what other costing inputs does Mr. Piaskoski take exception to and why?

VECC-2

Reference: Evidence of Michael Piaskoski, paragraphs 4 and 12

Preamble: At paragraph 4, the evidence states:

“The Carriers have reviewed the evidence of Hydro One with respect to the costing inputs of the proposed Pole Access Charge and, with the exception of the calculations of pole maintenance costs, are of the view that Hydro One has calculated the Pole Access Charge in accordance with the OEB Approved Methodology, and do not intend to challenge these other cost inputs and factors submitted by Hydro One in its evidence.”

At paragraph 12, the evidence notes that “*the OEB directed that its review of the Pole Access Charge would be conducted within the context of the OEB Approved Methodology*”.

2.1 What aspects of Hydro One’s calculation of the Pole Access Charge does Mr. Piaskoski consider to be defined by the “OEB Approved Methodology” and what aspects are costing inputs/assumptions that can be updated and/or revised as part as part of the current review? In responding, please address

2.1.1 If the choice of reference year used in the calculation (2012 in Hydro One’s Application) is considered a “costing input”, please explain why the use of 2012 is considered appropriate.

2.2 It is noted that no exception is taken to Hydro One’s proposal to calculate Loss of Productivity and Administration costs by inflating the costs used in the RP-2003-0249 Decision by 3% per annum. Why is this considered acceptable instead of determining these costs based on 2012 values as was done for all other aspects of the calculation?

VECC-3

Reference: Evidence of Michael Piaskoski, paragraphs 14-20

Preamble: The evidence states:

“The Carriers have reviewed the evidence of Hydro One with respect to the costing inputs of the proposed Pole Access Charge and, with the exception of the calculations of pole maintenance costs, are of the view that Hydro One has calculated the Pole Access Charge in accordance with the OEB Approved Methodology, and do not intend to challenge these other cost inputs and factors submitted by Hydro One in its evidence.”

3.1 To Mr. Piaskoski’s knowledge does Rogers or any of the other Carriers that have entered into the Standard Agreement (per paragraph 19), currently carry out any vegetation management activities on their own?

3.1.1 If yes, please outline which companies and what types of vegetation management activities they carry out.

3.2 To Mr. Piaskoski’s knowledge does Rogers or any of the other Carriers that have entered into the standard Agreement (per paragraph 19) currently pay Hydro One separately for vegetation management costs?

3.2.1 If yes, how are the charges determined?

3.3 Given that the Standard Agreement entered into by most wireline attachers envisions (per paragraph 20) Line Clearing costs being part of the pole rental rate, why shouldn’t, in Hydro One’s case, the pole rental rate for each company in such cases be adjusted to include these costs, over and above what would be rate determined using the OEB Approved Methodology?

VECC-4

Reference: Evidence of Michael Piaskoski, paragraph 26

Preamble: The evidence states:

“The vegetation management costs Hydro One seeks to recover through the Pole Access Charge clearly include costs associated with clearing vegetation from energized facilities (“power... conductors and electrical equipment”).”

4.1 Isn't it the purpose of the allocation methodology to appropriately apportion costs between the parties (i.e., Hydro One and Wireline Attachers) and, thereby address this issue?

4.1.1 If not, why not?

VECC-5

Reference: Evidence of Michael Piaskoski, paragraphs 27-38

5.1 The evidence argues that vegetation management costs will vary by pole location and states that, since wireline attachers operate in different communities and areas of Hydro One's service area, the associated costs should not be included in the pole attachment rate but rather charged separately to individual carrier. Does Mr. Piaskoski agree that the cost of purchasing and installing a pole will vary across Hydro One's service area based on geography and local community requirements?

5.1.1 If not, why not?

5.1.2 If yes, why does Mr. Piaskoski consider it acceptable (per paragraph 4) to base the pole access charge levied against all wireline carriers based on the average cost of a Hydro One pole?

End of document