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BY COURIER

April 15, 2016

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Suite 2700, 2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Walli,

EB-2015-0141 – Rogers Communication Partnership et al. for Leave to Bring a Motion to Review and Vary Decision EB-2013-0416/EB2014-0247 – Hydro One Interrogatory Responses

Please find attached two (2) hard copies of the responses provided by Hydro One Networks to the Supplementary Interrogatory Questions pursuant to Procedural Order No. 8.

Below are the Tab numbers corresponding to each intervenor:

Tab	Intervenor
1	Board Staff
2	VECC
3	The Carriers

An electronic copy of the Interrogatory Responses have been filed using the Board's Regulatory Electronic Submission System.

Sincerely,

ORIGINAL SIGNED BY ODED HUBERT

Oded Hubert

cc. Intervenors (electronic)

1 **Ontario Energy Board (Board Staff) INTERROGATORY #2.1**

2
3 **Interrogatory**

4
5 a) Please calculate the pole access charge in a manner you consider to be consistent with
6 the decision of the OEB in EB-2015-0004 dated February 25, 2016, the Hydro
7 Ottawa Ltd. Decision and Rate Order on Pole Attachment Charge. Where the
8 calculation uses data not presently on the record in this proceeding, please state the
9 source of the data and/or how the calculation was made.

10
11 In making the calculation, please apply the following:

- 12
- 13 • The actual number of attachers per pole should be used to reflect the specific
14 circumstances of Hydro One.
 - 15 • Historical costs should be used. Please provide a calculation using historical data
16 for 2014 and 2015 (as the last complete historical year).
 - 17 • No inflation adjustment for future years is to be made.
 - 18 • The direct costs (as described in the Hydro Ottawa decision) should be
19 determined on a per pole basis and then divided by the number of attachers per
20 pole. Actual numbers of poles and attachers should be used.
 - 21 • In calculating indirect costs, the net embedded cost per pole should be based on
22 the historical year-end net book value.
 - 23 • The pre-tax carrying cost of capital for the historical year is to be used.
- 24

25 If any of the above assumptions are considered by Hydro One to be inconsistent with the
26 Hydro Ottawa decision referred to above, please explain the reasons for this belief, and
27 provide the calculation with your preferred figures in addition to the method detailed
28 above.

29
30 b) Please indicate if loss in productivity costs are included in your calculation of the pole
31 access charge provided in answer to 1a), and explain the reasons for this choice. In
32 addition, please specifically confirm whether the cost of returning crews for pole
33 replacement is included in this cost category. If included, please provide the
34 calculation with the cost of returning crews for pole replacement removed.

35
36 c) i) Please indicate if a reduction in the net embedded cost per pole for power-specific
37 fixtures or assets has been made in the calculation. If yes, what percentage reduction
38 has been used? What is the basis for this percentage, and how does the configuration
39 of Hydro One's poles factor into the choice of percentage?

40
41 ii) Please indicate by what percentage depreciation and pole maintenance expenses
42 were reduced to account for power-specific assets.

1 *Response*

2
3 a) The following two tables provide the information requested. Hydro One has also
4 included in the tables for ease of reference the derivation of the current interim rate of
5 \$22.35, the original application requested rate for 2015 of \$37.05 and the Board
6 approved rate for Hydro Ottawa in EB-2015-0004 of \$53.00. The tables provide rates
7 for 2014 and 2015 based upon our understanding of the Hydro Ottawa decision
8 including the use of actual costs and attachers. Rates are also shown including
9 forestry management and excluding forestry management costs and a reduction of
10 power assets by both 5% (per Hydro Ottawa, Table 1) and by 15% (Table 2). Hydro
11 One continues to believe forestry management costs should be included in the rate
12 and power assets should continue to reflect a 15% reduction and the rate should
13 reflect 2015 actual costs.

14
15 Hydro One therefore believes the most appropriate rate for pole attachments is \$68.01
16 (Column 7 from Table 2).

Table 1

	Column #1	Column #2	Column #3	Column #4	Column #5	Column #6	Column #7
Inputs	OEB 2005	Hydro One Pre-filed	Hydro Ottawa Decision (EB-2015-0004)	Hydro One (2014) with 1.3 Attachers, based on Hydro Ottawa Decision (5% Reduction for Power-Specific Assets, No Forestry Costs Included)	Hydro One (2014) with 1.3 Attachers, based on Hydro Ottawa Decision (5% Reduction with Forestry Included)	Hydro One (2015) with 1.3 Attachers, based on Hydro Ottawa Decision (5% Reduction for Power-Specific Assets, No Forestry Costs Included)	Hydro One (2015) with 1.3 Attachers, based on Hydro Ottawa Decision (5% Reduction for Power-Specific Assets with Forestry Included)
DIRECT COSTS							
Admin Costs	\$0.69	\$0.85	\$2.28	\$0.90	\$0.90	\$0.93	\$0.93
Loss in Productivity	\$1.23	\$1.51	\$1.96	\$3.09	\$3.09	\$3.18	\$3.18
Total Direct Costs	\$1.92	\$2.36	\$4.23	\$3.99	\$3.99	\$4.11	\$4.11
INDIRECT COSTS							
Net Embedded Cost (NEC)	\$478.00	\$745.86	\$1,479.02	\$1,055.61	\$1,055.61	\$1,182.54	\$1,182.54
Depreciation Cost	\$31.11	\$12.68	\$38.89	\$26.63	\$26.63	\$28.80	\$28.80
Pole Maintenance Cost	\$7.61	\$82.41	\$11.89	\$5.52	\$88.56	\$8.04	\$77.28
Capital Carrying Cost	\$54.49	\$63.32	\$118.91	\$89.62	\$89.62	\$93.07	\$93.07
Total Indirect Costs	\$593.21	\$158.41	\$169.69	\$121.78	\$204.82	\$129.90	\$199.14
ALLOCATION							
# of non-power attachers	2.5	2.5	1.74	1.3	1.3	1.3	1.3
Allocation Factor	21.9%	21.9%	28.8%	34.3%	34.3%	34.3%	34.3%
Indirect allocated	\$20.43	\$34.89	\$48.80	\$41.77	\$70.25	\$44.56	\$68.31
Pole Rate	\$22.35	\$37.05	\$53.03	\$45.76	\$74.24	\$48.66	\$72.41

Note: Pole Counts for 2014 and 2015 have been corrected to reflect year-end numbers for both years.

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Table 2

Inputs	Column #1 OEB 2005	Column #2 Hydro One Pre-filled	Column #3 Hydro Ottawa Decision (EB-2015-0004)	Column #4 Hydro One Corrected Input (2014) with 1.3 Attachers, based on Hydro Ottawa Decision (15% Reduction for Power-Specific Assets, no Forestry Included)	Column #5 Hydro One Corrected Input (2014) with 1.3 Attachers, based on Hydro Ottawa Decision (15% Reduction for Power-Specific Assets, Forestry Included)	Column #6 Hydro One Corrected Input (2015) with 1.3 Attachers, based on Hydro Ottawa Decision (15% Reduction for Power-Specific Assets, no Forestry Included)	Column #7 Hydro One Corrected Input (2015) with 1.3 Attachers, based on Hydro Ottawa Decision (15% Reduction for Power-Specific Assets, Forestry Included)
DIRECT COSTS							
Admin Costs	\$0.69	\$0.85	\$2.28	\$0.90	\$0.90	\$0.93	\$0.93
Loss in Productivity	\$1.23	\$1.51	\$1.96	\$3.09	\$3.09	\$3.18	\$3.18
Total Direct Costs	\$1.92	\$2.36	\$4.23	\$3.99	\$3.99	\$4.11	\$4.11
INDIRECT COSTS							
Net Embedded Cost (NEC)	\$478.00	\$748.86	\$1,479.02	\$944.49	\$944.49	\$1,058.06	\$1,058.06
Depreciation Cost	\$31.11	\$12.68	\$38.89	\$23.83	\$23.83	\$25.77	\$25.77
Pole Maintenance Cost	\$7.61	\$82.41	\$11.89	\$8.52	\$88.56	\$8.04	\$77.28
Capital Carrying Cost	\$84.49	\$63.32	\$118.91	\$80.19	\$80.19	\$83.27	\$83.27
Total Indirect Costs	\$93.21	\$158.41	\$169.69	\$109.54	\$192.58	\$117.07	\$186.31
ALLOCATION							
# of non-power attachers	2.5	2.5	1.74	1.3	1.3	1.3	1.3
Allocation Factor	21.9%	21.9%	28.8%	34.3%	34.3%	34.3%	34.3%
Indirect allocated	\$20.43	\$34.69	\$48.80	\$37.57	\$66.05	\$40.16	\$63.91
Pole Rate	\$22.35	\$37.05	\$53.03	\$41.56	\$70.04	\$44.26	\$68.01
***Pole Counts for 2014 and 2015 have been corrected to reflect year-end numbers for both years.							

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1 **Explanations to the calculations in Table 1 and Table 2**

2
3 **Table 1**

- 4 1. **2014 Admin. Costs of \$0.90** = Admin. Costs from 2005 decision (\$0.69), add inflation of
5 3% for 9 years: $(0.69 \times (1.03)^9 = \$0.90)$
6
- 7 2. **2014 Loss of Productivity of \$3.09** = Loss of Productivity from 2005 decision (\$1.23),
8 multiply by 2.5 Attachers, to get full rate, divide by 1.3 Attachers to get rate per attacher, add
9 inflation of 3% for 9 years: $(\$1.23/2.5 \times 1.3 \times (1.03)^9 = \$3.09)$
10
- 11 3. **2015 Admin. Costs of \$0.93** = Admin. Costs from 2005 decision (\$0.69), add inflation of
12 3% for 10 years: $(\$0.69 \times (1.03)^{10} = \$0.93)$
13
- 14 4. **2015 Loss of Productivity of \$3.18** = Loss of Productivity from 2005 decision (\$1.23),
15 multiply by 2.5 Attachers, to get full rate, divide by 1.3 Attachers to get rate per attacher, add
16 inflation of 3% for 10 years: $(\$1.23/2.5 \times 1.3 \times (1.03)^{10} = \$3.18)$
17
- 18 5. **2014 Net Embedded Cost (NEC) of \$1,055.61** = {[2014 Year End Acquisition Value
19 (\$2,597,800,000) - 2014 Year End Accumulated Depreciation (\$847,500,000) =
20 (\$1,750,300,000)] / Qty. of Poles Corrected – Year End December 2014 (1,575,195 poles)}
21 *95%
- 22 6. **2015 Net Embedded Cost (NEC) of \$1,182.54** = {[2015 Year End Acquisition Value
23 (\$2,801,889,133) - 2015 Accumulated Depreciation (\$845,860,708) = \$1,956,028,425]/
24 Qty. of Poles Corrected – Year End December 2015 (1,571,384)} *95%
25
- 26 7. **2014 Depreciation Cost of \$26.63** = [2014 Year End Acquisition Value (\$2,597,800,000) *
27 HONI Depreciation Rate (1.7%) * 95% allocation factor to remove any pole-associated
28 assets] / Qty. of Poles (1,575,195)
29
- 30 8. **2015 Depreciation Cost of \$28.80** = [2015 Year End Acquisition Value (\$2,801,889,133) *
31 HONI Depreciation Rate (1.7%) * 95% allocation factor to remove any pole-associated
32 assets] / Qty. of Poles (1,571,384)
33
- 34 9. **2014 Pole Maintenance Costs of \$5.52** FORESTRY COSTS EXCLUDED =
35 Lines 2014: (Line Patrol (\$5.4M) + Defect Correction (\$3.3M))/Number of Poles
36 = \$8.7M/1,575,195 poles
37 = \$5.52 per pole

1 **10. 2014 Pole Maintenance Costs of \$88.56 FORESTRY COSTS INCLUDED =**

2 Lines 2014: (Line Patrol (\$5.4M) + Defect Correction (\$3.3M))/Number of Poles
3 = \$8.7M/1,575,195 poles
4 = \$5.52 per pole

5
6 Forestry 2014: (Customer Notification (\$9.2M) + Brush Control (\$23.9M) + Line Clearing
7 (\$97.7M))/Number of Poles
8 = \$130.8M/1,575,195
9 = \$83.04 per pole

10 Total Lines & Forestry Costs: \$5.52 + \$83.04 = \$88.56 per pole

11
12 **11. 2015 Pole Maintenance Costs of \$8.04 FORESTRY COSTS EXCLUDED =**

13 Lines 2015 = (Defect Correction (\$4.93M) + Line Patrol (\$7.7M))/Number of Poles
14 = \$12.63 M/1,571,384 poles
15 = \$8.04 per pole

16
17 **12. 2015 Pole Maintenance Costs of \$77.28 FORESTRY COSTS INCLUDED =**

18 Lines 2015 = (Defect Correction (\$4.93M) + Line Patrol (\$7.7M))/Number of Poles
19 = \$12.63 M/1,571,384 poles
20 = \$8.04 per pole

21
22 Forestry 2015 = (Line Clearing (\$94.6M) + Brush Control (\$7.6M) + Customer Notification
23 (\$6.6M))/ Number of Poles
24 = \$108.8M/1,571,384 poles
25 = \$69.24 per pole

26 Total Lines & Forestry Costs: \$8.04 + \$69.24 = \$77.28

27
28 **13. 2014 Capital Carrying Cost of \$89.62 = 2014 NEC of \$1,055.61 * 2012 Pre-Tax Weighted
29 Average Cost of Capital of 8.49% (since 2012 would have been Hydro One's rebasing year
30 given 2013 & 2014 were IRM years)**

31
32 **14. 2015 Capital Carrying Cost of \$93.07 = 2015 NEC of \$1,182.54) * 2015 Pre-Tax Weighted
33 Average Cost of Capital of 7.87%**

1 **Table 2**

- 2 1. **2014 Admin. Costs of \$0.90** = Same as Table 1 calculation
- 3
- 4 2. **2014 Loss of Productivity of \$3.09** = Same as Table 1 calculation
- 5
- 6 3. **2015 Admin Costs of \$0.93** = Same as Table 1 calculation
- 7
- 8 4. **2015 Loss of Productivity of \$3.18** = Same as Table 1 calculation
- 9
- 10 5. **2014 Net Embedded Cost (NEC) of \$944.49** = {[2014 Year End Acquisition Value
- 11 (\$2,597,800,000) -2014 Year End Accumulated Depreciation (\$847,500,000) =
- 12 \$1,750,300,000]/Qty. of Poles Corrected – Year End December 2014: (1,575,195 poles)}
- 13 *85%
- 14
- 15 6. **2015 Net Embedded Cost (NEC) of \$1,058.06** = {[2015 Year End Acquisition Value
- 16 (\$2,801,889,133) - 2015 Accumulated Depreciation (\$845,860,708) = \$1,956,028,425]/Qty.
- 17 of Poles Corrected – Year End December 2015 (1,571,384)}*85%
- 18
- 19 7. **2014 Depreciation Cost of \$23.83** = [2014 Year End Acquisition Value (\$2,597,800,000) *
- 20 HONI Depreciation Rate (1.7%) * 85% allocation factor to remove any pole-associated
- 21 assets] / Qty. of Poles (1,575,195)
- 22
- 23 8. **2015 Depreciation Cost of \$25.77** = [2015 Year End Acquisition Value (\$2,801,889,133) *
- 24 HONI Depreciation Rate (1.7%) * 85% allocation factor to remove any pole-associated
- 25 assets] / Qty. of Poles (1,571,384)
- 26
- 27 9. **2014 Pole Maintenance Costs of \$5.52** FORESTRY COSTS EXCLUDED = Same as Table
- 28 1 calculation
- 29
- 30 10. **2014 Pole Maintenance Costs of \$88.56** FORESTRY COSTS INCLUDED = Same as
- 31 Table 1 calculation
- 32
- 33 11. **2015 Pole Maintenance Costs of \$8.04** FORESTRY COSTS EXCLUDED = Same as Table
- 34 1 calculation
- 35
- 36 12. **2015 Pole Maintenance Costs of \$77.28** FORESTRY COSTS INCLUDED = Same as
- 37 Table 1 calculation

1 13. **2014 Capital Carrying Cost of \$80.19** = 2014 NEC of \$944.49 * 2012 Pre-Tax Weighted
2 Average Cost of Capital (8.49%)

3
4 14. **2015 Capital Carrying Cost of \$83.27** = 2015 NEC of \$1,058.06 * 2015 Pre-Tax Weighted
5 Average Cost of Capital (7.87%)

6
7 b) Yes, loss in productivity costs are included in the calculation of the pole access charge in
8 response 1a), as it was included in the March 7, 2005 RP-2003-0249 decision. Labour for
9 returning crews is not included in the cost category. Hydro One charges actual costs to
10 return and pull poles in the make-ready costs charged to the attacher.

11
12 c) i) Yes a reduction in the net embedded cost per pole for power-specific fixtures or assets has
13 been made in the calculation. Table 1 in question 1a) has a reduction of 5% to match the
14 Ottawa decision and Table 2 from Question 1a) has a reduction of 15%, which is the same as
15 the percentage reduction used in the 2005 RP-2003-0249 decision.

16
17 ii) Depreciation in Table 1 has a reduction of 5% to match the Ottawa decision and Table 2
18 has a reduction of 15%, which is the same as the percentage reduction used in the 2005 RP-
19 2003-0249 decision. No reduction was made for pole maintenance expenses.

1 **Ontario Energy Board (Board Staff) INTERROGATORY #2.3**

2
3 **Interrogatory**

4
5 In its letter to the OEB dated March 23, 2016, counsel to Hydro One stated that “there is
6 some information not on the current record that would likely be required by the Board in
7 order to make findings consistent with those in the Hydro Ottawa decision.” Please
8 provide any such information that is not already provided in the response to the previous
9 questions.

10
11 **Response**

12
13 The information noted in Hydro One’s letter of March 23, 2016 has been provided in the
14 response to Exhibit I, Tab 1, Schedule 2.1.

Vulnerable Energy Consumers Coalition (VECC) INTERROGATORY #2.9

Interrogatory

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?

1 **Response**

- 2
- 3 a) It is confirmed that the full telecom poles in the summer of 2015 should be 254,891
4 (276,218-21,327).
- 5
- 6 b) Service poles are only charged 75% of the full rate as a result of contractual negotiations
7 with the CCTA and the carriers in 2006. At that time it was agreed that the OEB approved
8 rate would be reduced by 25% for service pole rental charges, since Hydro One, at that time,
9 did not undertake forestry clearing on road crossing/service poles.
- 10
- 11 c) i) Confirmed. Hydro One is in the process of developing a new Non-reciprocal Telecom
12 Joint Use agreement that will cover both wireline and wireless attachments with the plan to
13 start negotiations with Carriers in 2017 and commence billing service poles at a full rate in
14 2018.
- 15
- 16 ii) See above.
- 17
- 18 d) Yes, the original response to Exhibit I, Tab 3, Schedule 5, Part e) was incorrect. Bell does
19 pay the OEB approved rate in some locations. These were identified as Bell MEU attachers
20 in the response to Exhibit JT3. These poles are in areas where Bell or Hydro One acquired
21 other utilities and the poles have not been integrated into the existing Bell/Hydro One
22 reciprocal agreement. Poles covered by the reciprocal agreement are not charged a rate as
23 each party maintains their structures.
- 24
- 25 e) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).
- 26
- 27 f) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).

Vulnerable Energy Consumers Coalition (VECC) INTERROGATORY #2.10

Interrogatory

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 VECC #5 b) using corrected attachment values for the August 2015.

Response

- a) Confirmed. Numbers in the first table were from the summer of 2015 and the numbers in the second table were as of December 31, 2015.
- b) Confirmed.
- c) Please see the corrected table below.

Type of Attachment		Forecast Attachment Volume (from Summer of 2015)	Interim Rate of \$22.35 for full poles and \$16.76 for non-reciprocal service poles	2015 Rate of \$37.05 for full poles and \$27.79 for non-reciprocal service poles
FULL Telecom Poles		254,891	\$5,696,813.85	\$9,443,711.55
Telecom Service Poles		23,788	\$398,686.88	\$661,009.05
Bell MEU		15,614	\$348,972.90	\$578,498.70
Generator Telecom		3,435	\$76,772.25	\$127,266.75
Total		297,728	\$6,521,245.88	\$10,810,486.05
No. of Wireline Attachments	628,966			
Bell Canada Attachments	331,238			

- d) Confirmed, the data was all from the summer of 2015.
- e) Removing the double counted poles (21,327) does reduce the total number of attachments from 650,293 to 628,966 and the total number of joint use attachments from 767,761 to 746,434, however when rounding is taken into account, the number of attachers remains at 1.3.

In the response to Exhibit I, Tab 3, Schedule 5 Part b), the attachers per pole was calculated to be 1.3, by rounding down as per the following calculation. $(767,761/576,068= 1.3327)$. By reducing the double counted poles, the number of attachers remains the same at 1.3 by rounding up, as shown in the following calculation $(746,434/576,068=1.2957)$.

Using final year end 2015 numbers and by reference to the total number of Joint Use Poles of 573,780 in Ex I, Tab 03, Sch 2.2 Part a(ii), and using adjusted total number of joint use attachments from (e) above of 746,434 attachments, the average number of attachers still equals $(746,434/573,780)1.3$ per pole.

- f) Please refer to the response to Part e) above.

1 **Vulnerable Energy Consumers Coalition (VECC) INTERROGATORY #2.11**

2
3 **Interrogatory**

4
5 Reference: VECC #5 b)
6 Carriers #1 d)

- 7
8 a) Please confirm that the 767,761 value for number of attachments used in VECC #5 b)
9 to determine the number of attachers per pole includes both attachments in the
10 communications space and non-Hydro One attachments in the power space.
11
12 b) Please confirm that there were 15,609 non-Hydro One attachments in the power space
13 (per Carriers #1 d)) in August 2015.
14
15 c) Please explain why (per Carriers #1 d)) Streetlights only pay \$2.04 per attachment as
16 opposed to the full rate. As part of the explanation, please indicate whether Hydro
17 One expects Streetlights will continue to pay a lower rate or whether they will be
18 charged the full rate at some future date? If the later, when?

19
20 **Response**

- 21
22 a) Confirmed.
23
24 b) Confirmed. There were 11,729 LDC attachments and 3,880 generator power space
25 attachments for a total of 15,609 non-Hydro attachments in the power space.
26
27 c) The streetlight attachment rate of \$2.04 remains in place to avoid the potential of
28 much higher reciprocal charges for use of municipal owned roads/right of ways.

1 **Vulnerable Energy Consumers Coalition (VECC) INTERROGATORY #2.12**

2
3 **Interrogatory**

4
5 Reference: EB-2015-0004, Undertaking J2.1
6 EB-2015-0004, OEB Decision and Rate Order on Pole Attachment
7 Charge, pages 6-8
8 EB-2015-0004, OEB Decision and Rate Order on Pole Attachment
9 Charge, page 14
10 VECC # 5 b)

11
12 Preamble: It is noted that in the Board’s EB-2015-0004 Decision regarding Hydro
13 Ottawa’s pole attachment rate the Board used the number of “full rate equivalent
14 attachers” as the basis for calculating the number of attachers per pole (see page 8 and the
15 referenced Undertaking J2.1).

16
17 At page 14 of its EB-2015-0004 Decision, the Board references the formula for
18 determining the allocation factor (see Footnote #37).

- 19
20 a) Based on the data from August 2015 please provide a table similar to Table 1 in
21 Undertaking J2.1 from EB-2015-0004 that calculates the number of “full rate
22 equivalent attachers” as applicable to Hydro One.
23
24 b) Using the results from part (a) please re-calculate:
25 a. The total number of “full rate equivalent” attachers per pole as of August
26 2015 (including non-Hydro One attachers in the power space).
27 b. The total number of non-power “full rate equivalent” attachers (i.e., those that
28 would typically use the communications space) per pole as of August 2015.
29
30 c) If sufficient data is not available from August 2015 to perform the calculations, please
31 provide schedules with similar calculations for the number of equivalent rate
32 attachments and attachers per pole using a more recent data set.
33
34 d) Using the results from parts a) – c) and the allocation factor formula referenced by the
35 Board in its EB-2015-0004 Decision, please re-calculate the space allocation factor,
36 providing the supporting details to the calculation.

Response

a) The following table reflects year-end 2015 numbers as August 2015 numbers are no longer available from the system.

	Number of Attachers	Percent of OEB Rate	Number of Full Rate Equivalent Attachers	Reference	Notes
Non Reciprocal - Full	230,016	100%	230,016	JT3	
Non Reciprocal - Service	21,367	75%	16,025	JT3	
Reciprocal - Full	24,605	100%	24,605	JT3	
Reciprocal - Service	2,461	75%	1,846	JT3	
Bell MEU	15,614	100%	15,614	JT3	
Generator Telecom	3,435	100%	3,435	JT3	
Total Equivalent Wireline Attachers			291,541		
LDC Attachers	11,729	OEB Power Rate	14,953	Carriers IR #1(d)	(LDC Power Revenue on Sliding Scale/\$22.35)
Generators	3,880	OEB Power Rate	10,090	Carriers IR #1(d)	(Generator Power Revenue on Sliding Scale/\$22.35)
Streetlights	101,859	OEB Streetlight Rat	9297	Carriers IR #1(d)	(Number of Lights (101,859) * \$2.04)/\$22.35)
Total Equivalent of non-Hydro One Attachers in the Power Space			34,340		
Total Equivalent of Wireline & non-Hydro One Attachers in the Power Space			325,881		
Note: Numbers are as of December 2015 (year-end)					

b) Please refer to the table in response to Part a) above.

c) Please refer to the table in response to Part a) above.

d) HONI is unable to recalculate the allocation factor as referenced by the board in EB-2015-0004, as Hydro One does not have pole counts available with only telecom wireline and street lights.

Vulnerable Energy Consumers Coalition (VECC) INTERROGATORY #2.13

Interrogatory

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.

Response

a) In RP-2003-0249, Appendix 2A, the Board used the CRTC estimate of \$0.62 for 1999 and inflated that number to the 2003 level of \$0.69 which works out to an inflation rate of approximately 3% per year. Distribution system inflation factors for the 2005-2012 period were also reviewed yield a rate of 2.7%. PEG has also indicated an inflation rate of 2.72% for the 2001-2011 period as shown below.

Summary of Inflation, TFP and Benchmarking Issues

**Larry Kaufmann
Pacific Economics Group
Toronto, Ontario
March 1, 2013**

For comparison's sake, here is the average 2001-2011 AWE inflation for different industry aggregates:

All industries	2.51%
Goods producing industries	1.92%
Utilities industries	2.72%
Manufacturing industries	1.46%



As a result the 3% inflation rate was chosen for escalation purposes.

1 **Vulnerable Energy Consumers Coalition (VECC) INTERROGATORY #2.14**

2
3 **Interrogatory**

4
5 Reference: Technical Conference, January 12, 2016, pages 43-44
6 Carriers #8 e)

- 7
8 a) The response to Carriers #8 e) indicated that maintenance costs associated with power-only
9 assets were not excluded from the calculation. However, during Technical Conference Mr.
10 Boldt indicated they were excluded. Please reconcile and confirm which statement is correct.

11
12 **Response**

- 13
14 a) There are two different items being referenced above. In the Exhibit I, Tab 4, Schedule 8,
15 Part e) response, the \$82.41 is calculated using the expense associated with “Defect
16 Corrections” as well as “Line Patrol” as calculated in the answer to Part d) of Exhibit 1, Tab
17 1, Schedule 1.

18
19 Referencing Technical Conference, January 12, 2016, pages 43-44, Mr. Boldt is explaining
20 where they obtained the value of “Defect Corrections” which is one portion of Preventative
21 and Corrective Maintenance on Table 6 of Exhibit C1, Tab 2, Schedule 2, page 20. Mr.
22 Boldt was removing Regulator and Recloser Maintenance (\$3.5M) as well as, ABS and LBS
23 Switch Maintenance costs (\$0.6M) in order to determine the appropriate value for defect
24 correction.

1 **ROGERS COMMUNICATIONS ET AL (The Carriers) INTERROGATORY #2.1**

2
3 **Interrogatory**

4
5 **Poles that contain “Joint Use” 576,068**

- 6
7 (a) What does “poles that contain ‘Joint Use’” mean? Do they refer to Joint Use Poles that
8 actually have at least one Wireline Attachment on them? Or do they refer to all poles that
9 have been designed and built as Joint Use Poles, whether or not they actually have Wireline
10 Attachments on them?
11
12 (b) Are these 576,068 poles that contain ‘Joint Use’ all owned by Hydro One?
13
14 (c) Under Hydro One’s joint use agreement with Bell (the “**Bell JUA**”), does Bell have the right
15 to attach to or otherwise access all 576,068 poles?
16
17 (d) Do the 576,068 poles represent the entire pool of Joint Use Poles that are shared by Bell and
18 Hydro One and covered by the Bell JUA (referred to as the “Joint Use Pool”)?
19
20 (e) If not, how many Joint Use Poles are included in the Joint Use Pool? How many Joint Use
21 Poles in the Joint Use Pool are owned by Hydro One and how many are owned by Bell?
22

23 **Response**

- 24
25 a) The Agreement for Licensed Occupancy of Power Utility Distribution Poles (for
26 Telecommunications Attachment) referenced in response to interrogatory HONI-11
27 (reference Carriers’ Evidence #20), was acknowledged to be signed and effective in 2006 and
28 renewed in 2014, contains the following definitions:
29

30 “Joint Use” means the use of a pole owned by Networks to support attachments of any
31 person who has an Agreement for Licensed Occupancy of Power Utility Distribution Poles
32 with Networks.
33

34 “Joint Use Pole(s)” means a pole(s) owned by Networks which supports attachments
35 including Service Drop(s) not owned by Networks.
36

- 37 b) Yes, all 576,068 poles are owned by Hydro One.
38
39 c) In Procedural Order #8, dated March 31, 2016, for proceeding EB-2015-0141, the OEB
40 denied the Carriers’ request for the production of any agreements with Bell in respect of joint
41 use and pole attachments. Furthermore in the OEB Decision and Order for proceeding RP-
42 2003-0249 dated March 7, 2005, it states: “In the Settlement Agreement of October 19, 2004,

1 all parties agreed that if the Board does set access conditions, these conditions should apply
2 to access to the communications space on the LDC poles by all Canadian Carriers as defined
3 in the Telecommunications Act and cable companies. The only exception is that these
4 conditions would not apply to the current joint use agreements between telephone companies
5 and electricity companies that grant reciprocal access to each other's poles". For these
6 reasons, Hydro One believes this question is not in scope for this proceeding.

7

8 d) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).

9

10 e) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).

ROGERS COMMUNICATIONS ET AL (The Carriers) INTERROGATORY #2.2

Interrogatory

Total no. of poles = 1,535,344

(a) You have restated that the total number of poles in 2012 was 1,535,344, of which 576,068 were identified as “containing Joint Use”. That leaves 959,276 poles that do not “contain Joint Use”, i.e. “Non-Joint Use”.

(i) Are all of these 959,276 poles designed and installed as Joint Use Poles or are they single use poles designed only for use by Hydro One?

(ii) Please provide a breakdown of the sizes and numbers of the poles used by Hydro One.

Pole height in feet	Joint Use Poles	Non-Joint Use	All Poles
30			
35			
40			
45			
50 and higher			
Total			

(b) Under the Bell JUA, does Bell have the right to access all of these 1,535,344 poles? If not, how many poles does Bell have the right to access?

Response

a) i) Typically, Hydro One designs and installs poles using the standard at the time of installation which accounts for space for joint use. However, sometimes pole changes are still required based on the request for what is being attached.

ii) A breakdown of the sizes and numbers of the poles used by Hydro One:

Pole Height (Feet)	Joint Use Poles	Non-Joint Use Poles	All Poles
30	53,743	178,533	232,276
35	162,645	350,419	513,064
40	164,390	261,596	425,986
45	114,933	114,288	229,221
50 and Higher	77,032	84,246	161,278
Unknown	1,037	8,522	9,559
Total	573,780	997,604	1,571,384

b) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c)

ROGERS COMMUNICATIONS ET AL (The Carriers) INTERROGATORY #2.3

Interrogatory

Bell Canada Attachments = 331,238

- (a) In Undertaking JT3, you state that, of these **331,238** poles, “Hydro One and Bell have a reciprocal pole use agreement (HONI 60% - Bell 40%). No annual invoice occurs due to this arrangement”.
- (i) Please explain in detail what these **331,228** poles represent? Are they the portion of the Joint Use Pool that Hydro One has agreed to build?
- (ii) We note that **331,228** represents 57.5% of the total 576,068 Joint Use Poles. Is this meant to approximate the 60% share of the Joint Use Pool for which Hydro One is responsible? If not, please reconcile the 60/40 split with the number of reciprocal poles.
- (iii) In the Joint Use Pool, how do you identify which poles are owned by Bell and which poles are owned by Hydro One?
- (iv) If the actual number of Joint Use Poles owned by each of Bell and Hydro One does not equal a 60/40 split, how is this reconciled? How often does this reconciliation occur?
- (b) Under the Bell JUA, how many Joint Use Poles owned by Hydro One does Bell have the right to use? How many Joint Use Poles owned by Bell does Hydro One have the right to use?
- (c) Under the Bell JUA, does Bell pay any fees to occupy Hydro One’s Joint Use Poles with its Wireline Attachments?
- (d) Under the Bell JUA, does Hydro One pay any fees to occupy Bell’s Joint Use Poles with its equipment?
- (e) Is it correct to conclude that, under the Bell JUA, rather than paying a fee to use Hydro One’s Joint Use Poles, Bell has agreed to install a certain number of Joint Use Poles which it will permit Hydro One to use at no cost?
- (f) Please confirm that our understanding of the Bell JUA stated below is correct. If it is not correct, please explain why. Bell and Hydro One jointly contribute to a pool of Joint Use Poles that both parties have the right to use. Hydro One will build 60% of the Joint Use Poles and Bell will build 40% of the Joint Use Poles.

1 To elaborate by way of example, if Hydro One and Bell were to decide to jointly build a total of
 2 1000 Joint Use Poles, at a cost of \$1000 per pole, Hydro One would build 600 poles at a cost of
 3 \$600K and Bell would build 400 poles at a cost of \$400K.

4
 5 Under the terms of the Bell JUA, Hydro One would have access to both its own
 6 600 poles, as well as the 400 poles built by Bell. It would, for all intents and purposes, access to
 7 600 + 400 = 1000 poles, but at an expenditure of only \$600K. This would mean that, in effect,
 8 Hydro One would be only paying \$600 for each Joint Use Pole it has access to.

9
 10 (g) In the Technical Conference, you were asked by Mr. Harper of VECC about the fact that Bell
 11 did not pay a Pole Attachment Fee. He asked:

12
 13 *“There is a difference here, and the question is how is the difference*
 14 *accounted for? Like, is it something Hydro One eats? It’s something that*
 15 *grosses up the rates to the other carriers, who are paying the full rate? Is*
 16 *it something ratepayers eat?*

17
 18 *How is the difference accounted for? And maybe you want to – you can*
 19 *give me an answer to that, or maybe you want to ponder on that a little bit*
 20 *and give me an answer in writing. That will be fine.”*

21
 22 Please respond to these questions as your response in Undertaking JT3 failed to address these
 23 questions specifically.

24
 25 (h) Please complete the following table.

26
 27 **“Bell JUPs”** refer to Joint Use Poles that are part of the Joint Use Pool.

28
 29 **“Non-Bell JUPs”** refer to Joint Use Poles that are not part of the Joint Use Pool

30

Type of Joint Use Pole	Number of Joint Use Poles	Number of Wireline Attachers
Non-Bell JUPs that have no Wireline Attachers		
Bell JUPs that have no Wireline Attachers		
Bell JUPs with only Bell as a Wireline Attacher		
Bell JUPs with Bell and at least one Wireline Attacher		
Non-Bell JUPs with at least one Wireline Attacher (excluding Bell)		
TOTAL		

1 (i) As we understand it, in BC, BC Hydro and Telus have a joint use arrangement that also
2 involves a 60-40 ownership split between the parties. However, under this arrangement, the
3 poles are truly jointly-owned in that BC Hydro owns 60% of each joint use pole and Telus
4 owns 40% of each joint use pole.

5 Does Hydro One have a similar pole-sharing arrangement with Bell or any other third party?
6 If so, please describe the arrangement in detail, including:

7
8 (i) the name of any third party joint-owner other than Bell;

9
10 (ii) the ownership split between Hydro One and Bell (or any other third party);

11
12 (iii) how many poles are affected or form part of this arrangement;

13
14 (iv) how costs incurred for these poles are shared between Hydro One and Bell (or the third
15 party); and

16
17 (v) how pole attachment fees received for these poles are shared between Hydro One and
18 Bell (or the third party);

19
20 **Response**

21
22 a) i) There are 331,238 Hydro One owned poles on which Bell has an attachment.

23 ii) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).

24 iii) In the field, dating nails identify the owner of the pole.

25 iv) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).

26 b) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).

27 c) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).

28 d) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).

29 e) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).

30 f) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).

31 g) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).

32 h) This data is not available.

33 i) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).

1 **ROGERS COMMUNICATIONS ET AL (The Carriers) INTERROGATORY #2.4**

2
3 **Interrogatory**

4
5 **Reciprocal full poles = 24,605**
6 **Reciprocal service poles = 2,461**

7
8 In your response to Interrogatory Carriers #1(a), you make reference to Attachment 1 for a list of
9 all Wireline Attachers in the communications space that have an executed
10 *Agreement for Licensed Occupancy of Power Utility Distribution Poles*, and pay the
11 OEB-approved Pole Attachment Fee of \$22.35.

12
13 Attachment 1 lists the following Wireline Attachers as having Reciprocal
14 Telecommunications Agreements:

- 15 • Bell Canada
16 • Lansdowne Rural Telephone Company
17 • Northern Tel
18 • Thunder Bay Telephone

19
20 (a) In the Technical Conference, you stated that, with the exception of the Bell MEU
21 attachments, Bell does not pay the OEB-approved Pole Attachment Fee of \$22.35. Please
22 reconcile this assertion with the fact that you included Bell in Attachment 1 setting out the
23 parties with reciprocal agreements that do pay the OEB-approved Pole Attachment Fee.

24
25 (b) Please describe in detail the nature of the relationship between Hydro One and each of
26 Lansdowne Rural Telephone Company, Northern Tel and Thunder Bay Telephone set out in
27 the Reciprocal Telecommunications Agreements.

28 (i) What is the split of the Joint Use Poles each party is obligated to provide?

29
30 (ii) What does each party pay the other for the use of or access to each other's Joint Use
31 Poles?
32

33 **Response**

34
35
36 a) Bell attachments covered by the Bell Reciprocal Agreement with Hydro One do not pay the
37 OEB-approved Pole Attachment Fee of \$22.35. For poles within MEUs which Hydro One
38 has purchased with Bell attachments, Bell pays the approved telecom rate of \$22.35

39
40 b) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).

1 **ROGERS COMMUNICATIONS ET AL (The Carriers) INTERROGATORY #2.5**

2
3 Interrogatory

4
5 **Ref: VECC #1(b), (c), (d)**

6
7 (a) Throughout this proceeding, Hydro One has provided several numbers representing
8 the number of poles in its inventory, including the total number of poles, Joint Use
9 Poles, etc. Please explain how these numbers have been calculated, assessed or
10 otherwise determined. Does Hydro One ever do an audit to confirm these numbers
11 and reconcile any discrepancies?

12
13 (b) What is the total number of third party Wireline Attachments on Hydro One's
14 distribution poles that pay a different rate other than the Pole Attachment Fee?

15
16 (a) Please identify the third parties that pay a different rate other than the Pole
17 Attachment Fee and the nature of their attachments.

18
19 (b) You indicate that the proposed rate in your application uses the ratio adopted in the
20 OEB Decision and Order RP-2003-0249. On what basis did you choose to use the
21 ratio of 2.5 Wireline Attachments per pole?

22
23 Response

24
25 a) Hydro One uses a variety of tools including an annual pole gathering program, GIS,
26 and Joint Use audits performed annually. The information gathered from the variety
27 of sources is reconciled to account for any discrepancies.

28
29 b) LDCs, Municipalities for Light attachments, and Generator Power attachments, are
30 all paying the appropriate Pole Attachment fees. Under the Bell Canada agreement,
31 Bell isn't paying the Telecom pole attachment rate for 331,238 attachments. The
32 number of third party wireline attachments on HONI poles paying a different rate
33 other than the Telecom Pole attachment rate is for Non-reciprocal service poles from
34 JT3 which equals 21,367 and the 2461 Telecom Reciprocal service poles listed as
35 paying 75% of the full rate, are now in 2016 paying the full rate.

36
37 c) Parties listed in Exhibit I-4-1, Attachment 1 of EB-2015-0141 filed 2015-09-08,
38 under "List of Non-Reciprocal Telecommunication Agreements". Any companies on
39 this list as well as new that have Service Poles, pay the Service Pole Attachment Fee.

40 Parties listed in Exhibit I-4-1, Attachment 2 of EB-2015-0141 filed 2015-09-08, "List
41 of All Municipal Attachment Agreements pay the Streetlight Attachment Fee.

1 Parties listed in Exhibit I-4-1, Attachment 3 of EB-2015-0141 filed 2015-09-08, “List
2 of Generators that have Agreements for Power Space” as well as new generators pay
3 the Generator Pole Attachment Fee

4 Parties listed in Exhibit I-4-1, Attachment 4 of EB-2015-0141 filed 2015-09-08, “List
5 of Local Distribution Companies that have Agreements with Hydro One” pay the
6 LDC Pole Attachment Fee

7 Bell Canada, when attaching to Hydro One poles, under the current pole-sharing
8 agreement pay according to their agreement

9 d) OEB issued Procedural Order #4 in this proceeding states: “The OEB’s review of the Pole
10 Access Charge in this proceeding will be within the context of the current approved OEB
11 methodology as described in Decision and Order RP-2003-0249, issued March 7, 2005.” In
12 that Decision it states: “The Board considers 2.5 attachers to be reasonable” and in the
13 calculation of the rate again states the use of 2.5 attachers. Hydro One therefore chose to keep
14 the ratio of 2.5 attachers to respect the Board’s direction expressed Procedural Order #4.

15 This number has now been adjusted to 1.3 attachers to reflect the Board’s direction in
16 PO #8 issued March 31, 2016.

1 **ROGERS COMMUNICATIONS ET AL (The Carriers) INTERROGATORY #2.6**

2
3 **Interrogatory**

4
5 **Ref: VECC #5(b), (c), (e), (h)**

- 6
7 (a) Please reconcile your response to VECC #5(b) that there are no third party Wireline
8 Attachers in the communications space that do not pay for an attachment to Hydro One poles
9 with the statement that there are 576,068 poles that contain “Joint Use” but only 319,055 of
10 the total number of Wireline Attachments pay the OEB-approved rate?
11
12 (b) Do all of the Wireline Attachments governed by an executed non-reciprocal agreement pay
13 \$16.76?
14

15 **Response**

- 16
17 a) As stated in Exhibit I, Tab 2, Schedule 2.10, Part c, the total number of joint use poles of
18 319,055 was revised to reflect the removal of the double-counted poles. The revised total is
19 297,728. Of that total, 23,788 only pay 75% of the approved interim telecom rate of \$22.35
20 to account for the Telecom Service Poles. The rest of the Attachers pay their applicable
21 rates.
22
23 b) Currently, all telecom non-reciprocal Attachers pay \$16.76 for Service Pole attachments and
24 they pay the full telecom rate (\$22.35) for all attachments other than service poles.

1 **ROGERS COMMUNICATIONS ET AL (The Carriers) INTERROGATORY #2.7**

2

3 **Interrogatory**

4

5 **Ref: Carriers Interrogatory #1**

6

7 (a) Please provide a complete list of the names of the Wireline Attachers that currently
8 have Wireline Attachments on one or more Joint Use Poles, regardless of whether
9 they pay the OEB approved Pole Attachment Fee of \$22.35. If the Wireline Attacher
10 does not pay the OEB approved Pole Attachment Fee, indicate what Pole Attachment
11 Fee or other compensation, if any, it pays to Hydro One for its Wireline Attachments.

12

13 **Response**

14

15 a) Refer to Exhibit I-4-1 Attachments 1-4.

ROGERS COMMUNICATIONS ET AL (The Carriers) INTERROGATORY #2.8

Interrogatory

Ref: Carriers Interrogatory #2(b), (c), (d), (f)

- (a) What compensation or other consideration does Bell provide Hydro One for its Wireline Attachments?
- (b) Will the proposed Pole Attachment Fee apply to Bell and its Wireline Attachments? If not, what fee will apply?
- (c) Please explain how the 60/40 split between Hydro One and Bell will still be valid if the Pole Attachment Fee is increased to at least \$37 if not more. If, in Hydro One’s view, the current Pole Attachment Rate of \$22.35 is no longer sufficient for Hydro One to recover its costs and such rate should be increased, shouldn’t Bell’s contribution to such costs (via the capital contribution of a certain number of Joint Use Poles to the shared pool) also be increased? If not, then why not?
- (d) Please provide the rates and amounts received by Hydro One for any services to Bell for work done on Bell poles (e.g., vegetation management, pole replacement, pole straightening, lines down, etc.).
- (e) Please provide the rates and amounts received by Bell, from Hydro One, for work performed by Bell on Joint Use Poles.

Response

- a) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).
- b) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).
- c) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).
- d) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).
- e) Please refer to Exhibit I, Tab 3, Schedule 2.1, Part c).

1 **ROGERS COMMUNICATIONS ET AL (The Carriers) INTERROGATORY #2.9**

2
3 **Interrogatory**

4
5 **Ref: Carriers Interrogatories 3(b) and 4(c)**

6
7 (a) Please confirm that, to date and since providing answers to the Carriers’ first set of
8 interrogatories, Hydro One has not conducted any studies or surveys to calculate the average
9 number of Wireline Attachers per Joint Use Pole.

10
11 **Response**

12
13 a) Confirmed. Since providing answers to the Carriers’ first set of interrogatories, Hydro One
14 has not conducted any studies or surveys to calculate the average number of Wireline
15 Attachers per Joint Use Pole.

ROGERS COMMUNICATIONS ET AL (The Carriers) INTERROGATORY #2.10

Interrogatory

Ref: Carriers Interrogatory 6(e)

(a) Please complete the table below with respect to Joint Use Poles replaced as part of a proactive replacement program, based on Hydro One’s collection of the relevant date which has commenced:

	2012	2013	2014	2015
Number of poles replaced				
Percentage of poles replaced				
Percentage of poles replaced that are beyond their expected life				

Response

a) Historically, when poles were replaced, the presence of third party attachments was not recorded. The collection of this information started in 2013. For 2013 and 2014, a GIS query to determine the total number of Hydro One-owned poles that contained third party attachments was not done. Therefore, Hydro One is unable to identify the percentage of Joint Use poles replaced in 2013 and 2014, but has done so for 2015

	2012	2013	2014	2015
Number of Joint Use poles replaced	Not available	1320	2874	4243
Percentage of Joint Use poles replaced	Not available	Not available	Not available	0.74% (4243/573,780)*100
Percentage of poles replaced that are beyond their expected life	Information is not available			

1 **ROGERS COMMUNICATIONS ET AL (The Carriers) INTERROGATORY #2.11**

2
3 **Interrogatory**

4
5 **Ref: Carriers Interrogatory 8(c)**

6
7 (a) Please provide the sources and supporting data for the values used to populate the table.

8
9 **Ref: Carriers Interrogatory 8(f)**

10
11 (b) Please provide all amounts paid to Hydro One by third parties for tree trimming or vegetation
12 management for each year from 2010 to 2015.

13
14 **Ref: Carriers Interrogatory 8(g)**

15
16 (c) For each year from 2010 to 2015, provide all amounts paid to Hydro One by third parties for
17 any activities included in *Maintenance (L&F)* costs (excluding tree trimming or vegetation
18 management).

19
20 **Response**

21
22 a) The Lines and Forestry Maintenance costs in the referenced tables are based on actual spend
23 (2010-2014), and forecasted spend for 2015, derived from Hydro One records on spending
24 on Programs. These figures were reported in EB-2013-0416, Exhibit C1-2-2 on Pages 20 and
25 36 of 42. The Lines and Forestry Maintenance Costs in the table presented in Carriers
26 Interrogatory 8(c) are derived from the figures presented in Exhibit C1, with certain
27 categories extracted that were not specific to pole maintenance.

28
29 b) The amounts paid to Hydro One by third parties for any tree trimming or vegetation
30 management performed, are subject to an agreement with Hydro One, and are paid according
31 to those executed agreements.

32
33 c) Hydro One does not perform any type of maintenance on third party assets.