

1                                    **Wirebury Connections Inc. INTERROGATORY #10 (Hydro One IR)**

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3                                    **Interrogatory**

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5                                    (a) Under what circumstances would the duplication of plant be necessary or acceptable?  
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7                                    (b) Does Hydro One have duplicate plant anywhere on its system or does any of its plant  
8                                    duplicate the facilities of any other distributors?  
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10                                   (c) If the answer to (b) is yes, please explain where and why the duplication(s) occurred.  
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12                                   (d) What criteria should the Board use to determine when and where duplicate plant  
13                                   should be permitted?  
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16                                   **Response**

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18                                   (a) Networks does not support the duplication of plant.  
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20                                   (b) Networks does not have duplicate facilities with other distributors, nor does it plan to  
21                                   have duplicate facilities in its service territory. Having well-defined service  
22                                   territories, as promoted by Networks, minimizes this uneconomic situation. Further,  
23                                   Networks also encourages joint use of facilities with other LDCs to further minimize  
24                                   plant duplication.  
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26                                   There are some cases, as a result of Networks' LDC acquisition activity, where  
27                                   duplication of lines is present. As these acquired LDCs are integrated fully within the  
28                                   Networks system, plant utilization will be optimized. Networks is focused on  
29                                   removing duplication over time.  
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31                                   (c) See response to (b).  
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33                                   (d) Networks does not believe the public interest is served by duplication of assets.  
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