



Jay Shepherd

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BY EMAIL and RESS

April 2, 2015
Our File: EB20140116

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2014-0116 – THESL 2015-19 – SEC Interrogatories to the Carriers

We are counsel to the School Energy Coalition (“SEC”). Enclosed, please find interrogatories on behalf of SEC regarding the evidence of the Carriers¹.

Yours very truly,
Jay Shepherd P.C.

Original signed by

Mark Rubenstein

cc: Wayne McNally, SEC (by email)
Applicant and intervenors (by email)

¹ Rogers Communication Partnership; Cogeco Cable Inc. on behalf of itself and its affiliates, including Cogeco Cable Canada LP and Cogeco Data Services Inc; Allstream Inc; and Telus Communications Company and its Affiliates.

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ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an Application by Toronto
Hydro-System Electric Limited for an Order or Orders
approving or fixing just and reasonable rates and other service
charges for the distribution of electricity as of May 1, 2015.

INTERROGATORIES TO THE CARRIERS¹

ON BEHALF OF THE

SCHOOL ENERGY COALITION

WR-SEC-1

[Ware Report] Please provide copies of the documents referenced in footnotes 16, 18, 19, 21, 23-25.

WR-SEC-2

[Ware Report, para 29] Please confirm that the statutory objectives under the *Telecommunication Act* differ from the statutory objectives for electricity under the *Ontario Energy Board Act*.

WR-SEC-3

[Ware Report, para 30] Please expand Table 3 to include the jurisdictions included in Table 1.

WR-SEC-4

Please provide a copy of the engagement letter and/or retainer between the Carriers and both Dr. Ware and Ms. Blackwell.

WR-SEC-5

Please detail Ms. Blackwell's experience regarding the economics and/or costing of pole attachments. Please provide copies of all expert report reports authored for any judicial or regulatory proceedings on the topic.

WR-SEC-6

[Brown Evidence, para 10] Please provide a copy of the current standard industry support structure agreement the Carriers have signed with Toronto Hydro.

¹ Rogers Communication Partnership; Cogeco Cable Inc . on behalf of itself and its affiliates, including Cogeco Cable Canada LP and Cogeco Data Services Inc; Allstream Inc; and Telus Communications Company and its Affiliates.

WR-SEC-7

[Brown Evidence, para 10] The Carriers claim that they face disadvantages as tenants of the pole as compared to Toronto Hydro as owner:

- a) Please confirm that if Toronto Hydro refuses a request to its pole, then it does not charge the wireline rate.
- b) Does Toronto Hydro require any of the Carriers to commit to a minimum or maximum length of time that they must attach to a pole? If so, please provide details.
- c) The Carrier's stated: "[w]here an attacher has more than one attachment (i.e. strand) on a pole, THESL can require it to consolidate its attachments into a single strand or give up one of its strands to THESL or a third party seeking access to a pole." How often has this happened to the Carriers in each of the last 3 years?
- d) What benefits, if any, do the Carriers believe pole tenancy has as compared to pole ownership?

WR-SEC-8

Is it the Carriers' understanding of Toronto Hydro's application that unlike distribution rates which will be adjusted annually, the wireline attachment rate will remain fixed for the entire term of the plan (2015-2019)?

WR-SEC-9

For each of the individual Carriers, please provide its forecasted number of attachments to Toronto Hydro's poles for each year between 2015-2019.

Respectfully submitted on behalf of the School Energy Coalition this 2nd day of April, 2015.

Original signed by

Mark Rubenstein
Counsel for the School Energy
Coalition