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August 17, 2011

Ms. Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street PO Box 2319, 27th Floor Toronto, ON M4P 1E4

Dear Ms. Walli:

#### RE: Application by Canadian Distributed Antenna Systems Coalition ("CANDAS"); Board File No.: EB-2011-0120

We represent CANDAS in connection with its application to the Board regarding access to the power poles of licensed electricity distributors for the purpose of attaching wireless telecommunications equipment ("**Application**").

In accordance with Procedural Order No. 1, CANDAS is filing the Responses to Interrogatories of Hydro Ottawa.

CANDAS will file two paper copies of the above-noted evidence tomorrow.

Yours very truly,

#### (signed) H.T. Newland

HTN/ko

cc: Mr. George Vinyard ExteNet Systems, Inc. Mr. Mark Rodger Borden Ladner Gervais All Intervenors **IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, (Schedule B);

AND IN THE MATTER OF an Application by the Canadian Distributed Antenna Systems Coalition for certain orders under the Ontario Energy Board Act, 1998.

# **RESPONSES TO INTERROGATORIES OF**

# HYDRO OTTAWA LIMITED ("HYDRO OTTAWA")

# (on the evidence of the Applicant, CANDAS)

August 17, 2011

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# CANADIAN DISTRIBUTED ANTENNA SYSTEM COALITION EB-2011-0120

# HYDRO OTTAWA LIMITED RESPONSE TO INTERROGATORIES

# Interrogatory #1

Ref: Application, pages 1-3 Issue: Relief Sought

# Question:

For each section of the relief sought in your application (sections a through g), please identify individually which reliefs would apply to Hydro Ottawa and individually what is the purpose of each relief that is sought?

# Response:

The Application seeks relief that is generic in nature and not specific to any one utility.

# Interrogatory #2

Ref: Application, pages 1-3, section (e) Issue: Relief Sought

# **Question:**

Please identify and detail the specific terms and conditions being sought by CANDAS through this application? Please indicate the process that CANDAS proposes to seek CANDAS's request for "a standard form of licensed occupancy agreement" for all electricity distributors in Ontario?

# **Response:**

See responses to CCC 13-15 and Board Staff 10.

#### Interrogatory #3

Ref:Evidence, pages 106-108Issue:Necessarily use of Hydro Infrastructure

#### **Question:**

In LEMAY-YATES ASSOCIATED INC's evidence re question 5, it states that "Utility Poles including hydro Poles, lampposts, street lights are clearly the support structure that best fulfills these requirements", and "...in Beaconsfield, it was noted that...two rooftops would also be used for DAS nodes." These quotes identified the locations for DAS nodes at rooftop, lampposts, streetlights etc. In addition to the power poles, please identify any and all structures and locations for DAS nodes. Please provide any details on the advantages / disadvantages for in each type of structure / location.

# **Response:**

See responses to THESL 3(b) and 8(a), Board Staff 6.1 and 14.1, and Written Evidence of Tormod Larsen (Q.4) and (Q.9).