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September 19, 2011

Delivered by Email, RESS and Courier

Ms. Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street Suite 2701 Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: Board File No. EB-2011-0120 (CANDAS Application) Canadian Electricity Association – Responses to Interrogatories of the Electricity Distributors Association (EDA)

Pursuant to Procedural Order No. 2, dated August 26, 2011, and the letter of the Assistant Board Secretary, dated September 7, 2011, extending the deadline for filing responses to interrogatories on intervenor evidence, please find attached the responses of the Canadian Electricity Association (the CEA) to the interrogatories of the EDA in the EB-2011-0120 proceeding.

Yours very truly,

Goodmans LLP

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Robert Malcolmson Encls.

c.c. Helen T. Newland, CANDAS counsel (via e-mail) Michael Schafler, CANDAS counsel (via e-mail) Kristi Sebalj, OEB counsel (via e-mail and courier) Alan Mark, EDA counsel (via e-mail and courier) All Parties (via e-mail) **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 THE ELECTRICITY DISTRIBUTORS ASSOCIATION ("EDA")

(on the evidence of the Intervenor, the Canadian Electricity Association (the "CEA")

September 19, 2011

1.

Reference: At page 10, LCC discusses "Neutral Host" capability.

Question:

Please indicate which, if any. components of a DAS network of the type described in the Applicants filing (and which are listed at page 18 of the LCC evidence) can be shared with other carriers? Can LCC discern from the evidence filed by the Applicants which, if any components of the proposed DAS network will in fact be capable of, and made available for, sharing with other carriers?

Response:

The components of an ODAS network that can be shared with other carriers include the BTS Hotel component, the fiber transport component and the antenna component. Based on our understanding of the Applicant's evidence, it would appear that all of these components of its system would be capable of being shared with other carriers.

The first party to install an ODAS system is not only building a facility for itself, but has the potential to provide access to others, and potentially to block others if the utility pole cannot support the attachment of another ODAS system.

2.

Reference: At page 21, item (f), LCC refers to the "pricing model".

Question:

What are the possible pricing models which can be applied to determine the price if the Board were to mandate attachment but not the current price in the CCTA order?

Response:

Possible pricing models:

- a) Cost-based: assess the actual cost of installation, maintenance and operation of an ODAS attachment, including issues of safety, physical size/weight etc;
- b) Market-based: examine pricing in other markets, and for other comparable attachments;
- c) Competition based: project how many operators may share the first ODAS system that is attached, and price the attachment rate in a way that takes into account the Neutral Host capability of the system where multiple mobile service providers may co-locate each of their equipment.

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