



## **Jay Shepherd**

Professional Corporation  
2300 Yonge Street  
Suite 806, Box 2305  
Toronto, ON M4P 1E4

### **BY EMAIL and RESS**

February 14, 2014

Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> Floor  
Toronto, Ontario  
M4P 1E4

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2013-0234 – THESL Section 29 – Interrogatories**

We are counsel to the School Energy Coalition ("SEC"). Enclosed please find interrogatories on behalf of SEC in the above-noted proceeding.

Yours very truly,  
**Jay Shepherd P.C.**

*Original signed by*

Mark Rubenstein

cc: Applicant and Intervenors (by email)

T. (416) 483-3300 F. (416) 483-3305

[mark.rubenstein@canadianenergylawyers.com](mailto:mark.rubenstein@canadianenergylawyers.com)  
[www.canadianenergylawyers.com](http://www.canadianenergylawyers.com)

**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-  
Electric System Limited for an order pursuant to section 29 of the  
*Ontario Energy Board, 1998*.

**INTERROGATORIES**  
**ON BEHALF OF THE**  
**SCHOOL ENERGY COALITION**

*[Note: All interrogatories have been assigned to issues. However, please provide answers that respond to each question in full, without being restricted by the issue or category. Many interrogatories have application to multiple issues, but all have been asked only once to avoid duplication.]*

**1-SEC-1**

[Tab 4, Expert Report of Charles Jackson]

What is Mr. Jackson's view of the current and likely future state of modern wireless networks as it related to the current and future demand for attachments to THESL polls of wireless telecommunication attachments?

**1-SEC-2**

What impact does Mr. Jackson believe the February 5, 2014 announcement by Industry Canada that it is changing its Antenna Tower Siting Policy will have on the future demand for attachments to THESL polls of wireless telecommunication attachments.

**1-SEC-3**

Since the filing of the application Public Mobile has been acquired by Telus. What effect will this have on the future demand for attachments to THESL polls of wireless telecommunication attachments.

**9-SEC-4**

Please provide all studies, reports, documents, and information that THESL has on the current and expected market rate for the attachments to polls of wireless telecommunication attachments.

**10-SEC-5**

[EB-2011-0120 THESL Response to VECC IR 5, Tab 3, Schedule 5]

In response to an interrogatory seeking THESL explanation on how forbearance from regulating wireless attachments would affect the regulatory treatment of revenues obtained, THESL stated:

Forbearance with respect to wireless attachment rates would have no impact on the treatment of revenues derived from pole attachments. This revenue, whether produced under regulated rates or market-based rates, would continue to be credited to customers via revenue offsets.

Has THESL changed its position? If so, on what basis?

**10-SEC-6**

[THESL Letter to the Board (August 15, 2014)/p.3]

In its August 15<sup>th</sup> letter to the Board, THESL stated:

That any excess of revenues over costs will be used to the benefit of ratepayers, in a mechanism to be dealt with in a THESL rate application. The undertaking to that effect is found in our letter of July 19, 2013, to the Board.

For the purposes of the undertaking:

- a. What elements will make up the costs?
- b. How does THESL propose to track the revenues and costs?

**11-SEC-7**

Please provide the annual revenue from attachments to THESL polls of wireless telecommunication attachments for each from 2008-2013. Please forecast the expected revenue per year under the existing regulated rate for 2014-2019.

**11-SEC-8**

What does THESL believe is the public interest for the purposes of this application?

**11-SEC-9**

[Pre-filled Evidence at para 16]

For the purposes of this application, what does THESL define as:

- a. Terms
- b. Conditions
- c. Rates

**11-SEC-10**

Please provide a copy of the standard agreement that THESL provides to parties who wish to attach wireless telecommunication attachments to THESL polls.

**11-SEC-11**

[EB-2011-0120 - Decision on Motion and Procedural Order No.8, THESL Affidavit of Documents in Respect of Procedural Order No. 8/Appendix A]

In EB-2011-0120, THESL contended that wireless attachments impair operations efficiency and present incremental safety hazards to electricity distribution.

- a. Does THESL still believe that this is the case? If so, please explain why THESL believes this.
- b. How does THESL plan to ensure that ratepayers are not harmed by operational efficiency and the incremental safety hazard?
- c. Please provide a copy of the information THESL previously provided in response to Part II of *Decision on Motion and Procedural Order No.8* in EB-2011-0120.

Submitted by the School Energy Coalition on this 14<sup>th</sup> day of February, 2014

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy Coalition