23 April 2015

VIA EMAIL: boardsec@ontarioenergyboard.ca

Ms. Kirsten Walli

Board Secretary

Ontario Energy Board

2300 Yonge Street, 27th Floor

Toronto, Ontario

M4P 1E4

Dear Ms. Walli:

Subject: OEB File: EB-2013-0416/EB-2014-0247 - Application by Hydro One Networks Inc. for approval of distribution rates for 2015 to 2019

1. The Canadian Cable Systems Alliance Inc. (“CCSA”) has been made aware of requests by Allstream, Cogeco Cable, Eastlink, Shaw, Rogers and Videotron (“the Carriers”) that the Ontario Energy Board (“the OEB”) issue an order:

a) granting the Carriers status as parties to this proceeding and leave to file a motion requesting that the Board review and vary the Decision as it relates to the Pole Attachment Rate approved in the Decision;

b) extending the deadline for Carriers to file a motion to review and vary the Decision until 20 days after the date on which the Board grants the Carriers leave to file the review and vary motion; and

c) staying that part of the Decision and any resulting Order that approves the Pole Attachment Rate. (Rogers letter, 13 April 2015, para. 46)

2. A list of CCSA members that operate in the Province of Ontario is set out in the Appendix to this letter.

3. CCSA member companies are smaller cable, telephone and IPTV companies that operate networks across Canada, including throughout Ontario. They provide telephone, high-speed Internet and video services over their networks, primarily to rural communities. Many Ontario-based CCSA members have attached elements of their wireline networks to the support structures of Hydro One and pay its pole attachment rate. CCSA members’ ability to provide high quality services to their customers depends on reasonable, and reasonably priced, access to support structures such Hydro One’s distribution poles. The rate charged by support structures for owners for access to those support structures is a significant component of their cost structure

4. CCSA and its member companies have only recently been made aware of the OEB’s decision and, like the larger carriers listed above, received no advance notice of this rate increase application or the OEB’s decision.

5. CCSA notes the following assertion by Rogers:

The only evidence about the Pole Attachment rate is found on a single page buried about 2,900 pages later in a Supporting Schedule called “Miscellaneous Charges”, which is one of 12 supporting schedules to Exhibit G - Cost Allocation and Rate Design. Significantly, the written direct evidence for Cost Allocation and Rate Design, which is contained in 15 other schedules, contains no reference to the Pole Attachment Rate. (Rogers letter, 13 April 2015, para. 30)

6. At page 5 of its letter, dated 7 April 2015, Hydro One states:

Each of the Cable parties are large, sophisticated corporations that are regulated entities themselves. All of them had the opportunity to participate but failed to do so. Each had an obligation and every opportunity to determine whether the application would impact them...

7. As noted earlier, CCSA member companies are small businesses that operate throughout Ontario, primarily in rural communities. Very few of these companies have staff dedicated to regulatory issues and for its part, due to its national scope and limited resources, CCSA does not monitor OEB proceedings. In light of the fact that no notice was provided and given that the proposed Pole Attachment rate was buried in a record consisting of many thousands of pages, Hydro One’s claim that an opportunity to participate ever existed rings hollow.

8. The rate increase will result in substantial additional payments to Hydro One. Due to the lack of notice, CCSA members have had no opportunity to anticipate or factor in potential additional costs into their budgeting process for the current year.

9. CCSA members have been blind-sided in a manner that will result in significant financial hardship. Moreover, CCSA member companies have, comparatively, significantly less capacity to absorb these substantial impacts of this rate increase than do the larger Carriers.

9. For all of these reasons, CCSA submits that the OEB should grant the relief requested by the Carriers.

Sincerely,



Christopher J. Edwards

Vice-President, Regulatory Affairs

Cc: Hydro One

 Allstream

 Cogeco Cable

 Eastlink

 Shaw

 Rogers

 Videotron

ITPA

**Appendix**

**CCSA Member Companies with Systems in Ontario**

Astrocom Cablevision Inc.

Beanfield Technologies Inc.

Black Creek Cable TV Inc.

Bragg Communications Inc.

Brooke Telecom Co-op Ltd.

Bruce Telecom

Cable Cable Inc.

Cochrane Telecom Services

Constance Lake First Nation

Execulink Telecom Inc.

Gosfield North Communications

Hastings Cable Vision Limited

Hay Communications Coop Ltd.

Huron Telecommunications Coop Ltd.

Lansdowne Rural Telephone Company (New Member)

Markdale Cable TV

Mitchell Seaforth Cable TV Ltd.

Mocreebec Development Corp. Ltd.

Moose Factory Cable Inc.

Mornington Communications Coop Ltd.

Nexicom Communications Inc.

Nor-Del Cablevision Ltd.

North Frontenac Telephone Corporation Ltd.

NRTC Communications

Tbaytel

Total Cable Service

Tuckersmith Communications Coop Ltd.

VMedia

Wightman Communications Ltd.

WTC Communications