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November 1, 2017

**BY EMAIL AND COURIER**

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

Dear Ms. Walli:

**Re: File Number EB-2016-0085, InnPower Corporation, Specific Service Charges-Pole Attachment Rate - Rogers' Response to Procedural Order 6**

This is the response of Rogers Communications Canada Inc. ("Rogers") to Procedural Order 6 issued by the Board on October 7, 2017 in which the Board asked InnPower, interveners and Board staff to comment on the preliminary question of whether the Board should consider a change to InnPower's pole attachment and microFIT charges.

For the reasons explained below, Rogers submits that the Board should consider a change to InnPower's pole attachment charge and should not delay its consideration to wait for the outcome of the Pole Attachment Working Group ("PAWG") established by the Board in EB-2015-0304.

Rogers' submission is limited to the question as it relates to the pole attachment charge. Rogers takes no position with respect to the microFIT charge,

InnPower initially filed for a 113% increase in its pole attachment charge from \$22.35 to \$47.60. It subsequently decided to withdraw its request for an increase in the pole charge preferring instead to await the outcome of the PAWG. As a result, in its August 4, 2017 responses to interrogatories, InnPower did not respond to any of the staff interrogatories related to the calculation of the pole attachment charge.

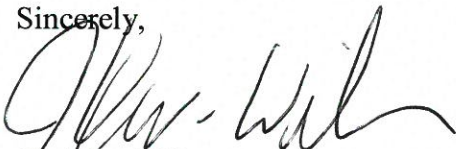
Rogers was an active participant in the PAWG and its misgivings about that process have been made known to the Board. These misgiving include concerns that insufficient time was devoted to an examination of the pole charge methodology and the potential

prejudice of deriving a province-wide average pole attachment rate for all utilities using undisclosed and untested data. Moreover, at this point it is not clear when a draft report will be produced and whether it will provide any assistance to the Board in establishing a fair and transparent methodology for determining pole attachment rates in Ontario.

Rather than prolonging the uncertainty surrounding the InnPower rate waiting for the outcome of a flawed and indeterminate PAWG process, Rogers submits that the Board should instead consider and determine an InnPower pole attachment rate that is based on reliable evidence relevant to InnPower's particular cost structure.

As a first step in this process, the Board should convene a settlement conference in an attempt to dispose of the issue as efficiently and expeditiously as possible. Given the small number of interested parties and the fact that the pole charge is a discrete special charge with well-defined cost factors, Rogers submits that there is a substantial likelihood that the parties will be able to come to a mutually-agreeable resolution without the need to engage in a more comprehensive process.

Sincerely,



Jay Kerr-Wilson

cc Pam Dinsmore, Rogers  
Michael Piaskoski, Rogers  
Brenda Pinke, Jennifer Cowles, InnPower Corporation  
John Vellone, Borden Ladner Gervais LLP