



BY EMAIL and RESS

Mark Rubenstein
mark@shepherdrubenstein.com
Dir. 647-483-0113

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

December 4, 2017
Our File: EB20160086

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2016-0086 – InnPower Corporation – SEC Interrogatories

We are counsel to the School Energy Coalition (“SEC”). Pursuant to Procedural Order No.7, please find SEC’s interrogatories on the proposed pole attachment rate.

Yours very truly,
Shepherd Rubenstein P.C.

Original signed by

Mark Rubenstein

cc: Wayne McNally, SEC (by email)
Interested parties (by email)

ONTARIO ENERGY BOARD

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 InnPower Corporation under Section 78 of the *Ontario Energy Board Act, 1998* for an Order or Orders approving or fixing just and reasonable rates and other service charges for the distribution of electricity as of July 1, 2017.

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

SEC-45

[p.6] Please provide a breakdown of the 12% WACC calculation.

SEC-46

[p.6-7] On p.6 the Applicant shows an “Average Number of 3rd Party attachers on a IPC Pole” of 1.09. On p.7, the Applicant shows the “Estimated # of Attachments per pole: of 1.09. Is the Applicant calculation based on attachers or attachments per pole? If it is attachments, please provide the same calculation on a per attacher basis.

Respectfully submitted on behalf of the School Energy Coalition this December 4th, 2017.

Original signed by

Mark Rubenstein
Counsel for the School Energy
Coalition