



BY EMAIL and RESS

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2300 Yonge Street
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May 28, 2018
Our File: EB20170049

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2017-0049 – Hydro One Dx 2018-2022 – Pole Attachment Charge

We are counsel to the School Energy Coalition (“SEC”). We write in response to the Board’s invitation in the *Decision on Confidentiality Procedural Order No. 6* for submissions from parties on how to move forward with the pole attachment issues in light of the issuance of the *Report of the Ontario Energy Board, Wireline Pole Attachment Charges (EB-2015-0304)*, dated March 22, 2018 (“Pole Attachment Charge Report”).

SEC submits Hydro One should be required to update its proposed new pole attachment charge and supporting evidence consistent with the OEB’s update methodology contained in the Pole Attachment Charge Report for a LDC-Specific Rate, or maintain its current rate for 2018 and accept the provincial rate beginning in 2019. This approach is consistent with the implementation options set out in the report (see page 52).

If Hydro One chooses to set an LDC-Specific Rate, an approach SEC recommends, Parties should have the opportunity to test that evidence by way of interrogatories and/or a technical conference, file responding evidence if they feel that is necessary, which itself should be subject to some form of discovery, followed by final argument.

SEC recognizes that the time frame to undertake this is not easily compatible with the hearing schedule so it may be more feasible to have the pole attachment charge process work on a different procedural track than the rest of the issues in this proceeding.

Yours very truly,
Shepherd Rubenstein P.C.

Original signed by

Mark Rubenstein

cc: Wayne McNally, SEC (by email)
Applicant and Intervenors (by email)

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