

January 16, 2015

Kirsten Walli
Board Secretary
Ontario Energy Board,
2300 Yonge St.
Suite 2700, P.O. Box 2319
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Wireless Attachment Consultation
Board File No. EB-2014-0365**

On June 5, 2014, the Ontario Energy Board (the “Board”) issued its Decision and Order in Toronto Hydro-Electric System Limited’s (“THESL”) Wireless Attachment proceeding (EB-2013-0234). In its Decision and Order, the Board determined that THESL could charge market rates for all wireless attachments. On December 11, 2014, the Board advised that it is now seeking comments on whether all distributors should be able to charge market rates for wireless attachments (EB-2014-0365). Oakville Hydro Electricity Distribution Inc. (“Oakville Hydro”) appreciates the opportunity to comment in this proceeding.

In THESL’s Settlement Proposal of the Wireless Attachment proceeding, the parties agreed that no wireless attachers or telecom users would be materially harmed by a decision to allow THESL to charge market rates for wireless attachments. The parties also agreed that THESL’s ratepayers would benefit from this relief.¹

In response to Consumer Council of Canada interrogatories, THESL advised that its affiliate, THESI, has been charging a rate of \$5,000 per attachment since 2012 and that it was THESL’s expectation that it would charge the same rate for applications from wireless service providers currently before it.² THESL also estimated the cost-based rate for telecommunications wireline pole attachments is at least \$69.87 per pole, per year³.

¹ Settlement Proposal, EB-2013-0234, page 6.

² THESL’s responses to Consumer Council of Canada Interrogatories number 3 and 5.

³ THESL’s response to Consumer Council of Canada Interrogatory number 16.

In light of the submissions that ratepayers would benefit from the additional revenues collected from wireless attachers and that no telecom users would be harmed, Oakville Hydro submits that it is appropriate for the Board to permit all distributors to charge market rates for wireless attachments. While Oakville Hydro has not conducted any research into the market price for wireless attachments in its service area, the evidence would strongly suggest that it would be considerably higher than the current rate of \$22.35 for wireline pole attachments.

Oakville Hydro also submits that, in light of THESL's estimated cost-based rate for telecommunication pole attachments, Oakville Hydro supports the Board's plans to undertake a review in 2015 of all Specific Service charges, including the charge of \$22.35 which is now more than 10 years old for wireline pole attachments that was approved in 2005 (EB-2003-0249). Oakville Hydro estimates that an increase in the approved pole attachment rate, for wireline attachments, of the magnitude that was estimated by THESL, would result in a material increase in the revenues received from attachers thereby providing further relief to Oakville Hydro's ratepayers.

Respectfully submitted,



Mary Caputi
Director, Regulatory Affairs
Telephone: 905-825-6373
Email: mcaputi@oakvillehydro.com