



## Jay Shepherd

Professional Corporation  
2300 Yonge Street  
Suite 806, Box 2305  
Toronto, ON M4P 1E4

**BY EMAIL and RESS**

November 30, 2015  
Our File: EB20150141

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

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2015-0141– Motion to R&V Decision EB-2013-0416 – SEC Interrogatories**

We are counsel to the School Energy Coalition (“SEC”). Enclosed, please find interrogatories on behalf of SEC.

Yours very truly,  
**Jay Shepherd P.C.**

*Original signed by*

Mark Rubenstein

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

T. (416) 483-3300 F. (416) 483-3305

[mark.rubenstein@canadianenergylawyers.com](mailto:mark.rubenstein@canadianenergylawyers.com)

[www.canadianenergylawyers.com](http://www.canadianenergylawyers.com)

**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** a motion by Rogers Communications Partnership et al. to review and vary Decision EB-2013-0416/EB-2014-0247 as it relates to the Specific Charge for Cable and Telecom Companies Access to the Power Poles charged by Hydro One Networks Inc.

**INTERROGATORIES**

**ON BEHALF OF THE**

**SCHOOL ENERGY COALITION**

1. [Piaskoski Evidence, para. 4] Mr. Piaskoski's evidence is that with the exception of the calculation of the pole maintenance costs, Hydro One has calculated the Pole Access charge in accordance with the OEB approved methodology.
  - a. Please explain why Mr. Piaskoski believes that using specifically certain 2012 data to calculate the pole attachment rate for 2015 is in accordance with the Board approved methodology.
  - b. Please confirm that using certain 2012 data to set the pole attachment rates for 2015 will lead to a cross-subsidy between distribution ratepayers and pole attachers. If not confirmed, please explain why not.
2. [Piaskoski Evidence, para. 23] Please explain why it is fair and appropriate for the Carriers to believe it is inappropriate to include line clearing (i.e. vegetation management costs) in the pole attachment rate if its own signed agreements with Hydro One state that it should be included?
3. [Piaskoski Evidence, para. 23] Do any of the Carriers<sup>1</sup> undertake vegetation management activities related to the "neutral wire" for attachments on Hydro One poles? If so, please provide details.

---

<sup>1</sup> Rogers Communications Partnership, Allstream Inc., Shaw Communications Inc., Cogeco Cable Inc., on behalf of itself and its affiliate, Cogeco Cable Canada LP, Quebecor Media, Bragg Communications, Packet-tel Corp., Niagara Regional Broadband Network, Tbaytel, Independent Telecommunications Providers Association (ITPA) and Canadian Cable Systems Alliance Inc. (CCSA)

Respectfully submitted on behalf of the School Energy Coalition this November 30<sup>th</sup>, 2015.

*Original signed by*

---

Mark Rubenstein  
Counsel for the School Energy  
Coalition