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Wirebury Connections Inc. INTERROGATORY #15

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Interrogatory

Networks believes that disputes will occur with respect to the obligation to connect if the obligation is shared.

Reference: p. 17, L20-21

a) Please provide the statutory or regulatory basis for the obligation to connect and explain why Networks believes there would be disputes given the clarity of the legislative framework.

b) If the conditions outlined in section 28 of the Electricity Act are met, does Networks believe that it has an unconditional obligation to connect or is it subject to economic feasibility, safety and reliability? Please explain your response.

Response

a) See Networks' pre-filed evidence, Appendix A and Networks' Exhibits J8-10-09 (a) and (b)

b) Networks believes that the two conditions of section 28, joined as they are by the word "and", indicate that the second subsection is conditional on the satisfying of the condition in the first subsection. Since the customer "lies along", Networks has an obligation to connect subject only to the same customer lying along the lines of another distributor.