

1 **Wirebury Connections Inc. INTERROGATORY #16**

2  
3 **Interrogatory**

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5 Networks believes that overlap will create planning problems for the incumbent  
6 distributor and provides two scenarios to demonstrate its position.

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8 Reference: p. 18 L29 – p. 19 L12

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- 10 a) Where there is greater value to the customer to attach to the applicant's system  
11 than attaching to the incumbent's grid, why should the customer be forced to  
12 take a lesser value service? Would it not be better to allow the customer to  
13 select its distributor based on the value of the services offered?
- 14
- 15 b) If the customer's building is located along the line of the applicant but resides  
16 in the service area of the incumbent, would the applicant have an obligation to  
17 connect the customer under Sec. 28 of the Electricity Act if the customer  
18 requested the connection in writing from the applicant? If not, please explain  
19 why.
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- 21 c) Please confirm that Hydro One is referring to embedded distribution service in  
22 these paragraphs whereby it is possible for another LDC to connect the same  
23 customers that Hydro One would have connected using the same upstream  
24 facilities. If this is not the case, please clarify.
- 25
- 26 d) Other than the need for one additional metering point, what other additional  
27 plant would be required for embedded distribution? How would service lines  
28 be duplicated if the proposed connection is a new subdivision?
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- 30 e) Why would costs need to be increased for existing or future customers if the  
31 applicant is required to pay the cost of the additional meter and any stranding  
32 of assets?
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35 **Response**

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- 37 a) The interrogatory is not clear why the incumbent distributor could not offer the same  
38 services or why service territory amendments for new embedded distribution are  
39 required to facilitate the new services. Matters raised in this interrogatory are raised  
40 throughout Networks' pre-filed evidence, including p. 4, lines 3 to 5.
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- 1 b) No. The applicant would have an obligation to obtain a licence amendment. If  
2 Networks were the incumbent LDC, it would seek to ensure that the connection  
3 offered by the applicant is the lowest incremental cost to connect, including any costs  
4 for stranding and underutilization. If Networks were the applicant LDC, it would  
5 contact the incumbent LDC to ensure the incumbent was aware of the implication of  
6 the application. These actions are consistent with Appendix B, Networks Prefiled  
7 Evidence.  
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- 9 c) In lines 7 to 12, page 19, Networks confirms it is referring to new service territory  
10 embedded in Networks' service territory.  
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- 12 d) The additional plant is the meter point and a disconnect device on the embedded  
13 LDC's side of the meter. While service lines may not be duplicated, the incumbent  
14 distributor would still have the planning obligation for the embedded distributor, just  
15 as Networks does for existing embedded distribution. The embedded distributor has  
16 no planning obligations for upstream capacity.  
17
- 18 e) If by costs you mean rates, please see Exhibits J8-11-13 and J8-12-14.  
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