

Wirebury Connections Inc. INTERROGATORY #21

Interrogatory

Networks refers to “general license expansions” and “general service territory expansions” as being distinct from “individual lines along customers” and “specific customer connections” when asserting that only Networks is entitled and obliged to plan for future growth in its service territory.

Reference: p.6 L27 to p.7 L6 and Appendix B, p. 1, L13-14

- a) Please define and describe differences between a “general service territory expansion” and a “specific customer connection”.
- b) Does Networks expand its system, without customer requests in the expectation that it will automatically serve customers? If this is not the case, how would assets be stranded? If Networks does pre-build capacity in expectation of customer growth, what contingencies does it include to mitigate connection and load variances and to what degree does it allocate capacity to individual customers?
- c) Does Networks contact new customers before building lines or capacity to serve those customers or does it build on the expectation that it would connect those customers automatically? If an embedded distributor were allowed to connect some of the new customers using all of the capacity that Networks planned for those customers, how would Networks’ plans be adversely impacted?
- d) What legislative or regulatory authority did Networks rely on to determine that it was entitled and obliged to serve all future growth in its service territory. Is this a recent approach to expansion? If not, how was that approach possible prior to the recent legislative changes when Networks was obligated to relinquish service territory to expanding municipalities?

Response

- (a) A licence amendment for a general service territory expansion is not driven by specific customer connections, but would contain the right to make future, unspecified customer connections. A licence amendment for a specific customer connection is for the right to connect a specific customer seeking a connection.

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Exhibit J8

Tab 12

Schedule 21

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- 1 (b) Please see Networks' Exhibit J8-12-7(e)
- 2
- 3 (c) Please see Networks' Exhibit J8-12-7(e) and J8-12-10(b).
- 4
- 5 (d) Please see Networks' Exhibit J8-10-9.
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