

**Interrogatories of Wirebury Connections Inc.
for the Combined Distribution Service Area Amendments Proceeding
RP-2003-0044**

1. What is Hydro One's definition of a new customer? Does Hydro One agree that new customers should include customers that are not currently connected or metered? If not, please explain why.
2. What criteria and connection options should the Board adopt when determining the most cost-effective way to serve new customers?
3. Does Hydro One believe that new (i.e. unattached or non-metered) customers will always be better served by Hydro One through an extension of its existing network? What are the assumptions underlying this conclusion?
4. If new (i.e. unattached or non-metered) customers can be served by an embedded distributor connecting to Hydro One's network to deliver the power at a rate lower than Hydro One, would the embedded solution be more cost effective? If not, please explain why with specific reference to the price and service considerations contained in Objective 3 of the *Ontario Energy Board Act, 1998*, (the "OEB Act).
5. Please explain how and to what degree, if at all, Hydro One assets would be stranded if a new (i.e. unattached or non-metered) customer is served by an embedded distributor connecting to and utilizing the same upstream network facilities that Hydro One would have used to serve the same customer?
6. (a) What importance does Hydro One place on customer choice?

(b) Does Hydro One take the position that new (i.e. unattached or non-metered) customers should be allowed to choose an alternate distribution company?

(c) If the answer to (b) is no, please explain why, with specific reference to subsection 28(b) of the *Electricity Act, 1998*, (the "Electricity Act") and Objective 2 of the OEB Act?
7. (a) What is Hydro One's position with respect to overlapping service areas?

- (b) Would overlap be the easiest way for the Board to administer changes to licensed service areas where a LDC or Hydro One plans to serve a customer in another distributor's service territory?
 - (c) If the answer to (b) is no, please explain why.
 - (d) What does Hydro One think is the best way for the Board to administer changes to licensed service areas?
8. (a) If LDCs are allowed to compete for new customers everywhere and/or LDCs are allowed to continue to expand their service areas into Hydro One's area of operations, what would Hydro One's position be with respect to Hydro One competing for customer attachments in the service areas of LDCs?
- (b) If Hydro One takes the position that it should not or cannot provide distribution services to customers in areas outside its current areas of service, please explain why indicating whether and how that would prevent other distributors from competing on this basis?
9. As described in section 28 of the Electricity Act, the obligation to connect is contingent on proximity of a building to Hydro One's distribution system and a written request from the owner, occupant or other person in charge of the building.
- (a) Does Hydro One agree that new customers located in its current areas of service should be able to request connection and be provided non-discriminatory access to its distribution network?
 - (b) If the answer to (a) is no, please explain how Hydro One's position is compatible with Section 28 of the Electricity Act and Objective 2 of the OEB Act.
 - (c) Would Hydro One's position change if the customer requesting the connection wanted to operate as an unlicensed distributor as permitted by section 4.0.1(1) of Regulation 161/99?
 - (d) Would Hydro One's position change if the unlicensed distributor wished to transfer ownership and/or operation of its distribution system to a third party licensed embedded distributor?
 - (e) If the answer to (c) or (d) is yes, please fully explain Hydro One's position.

10. (a) Under what circumstances would the duplication of plant be necessary or acceptable?
- (b) Does Hydro One have duplicate plant anywhere on its system or does any of its plant duplicate the facilities of any other distributors?
- (c) If the answer to (b) is yes, please explain where and why the duplication(s) occurred.
- (d) What criteria should the Board use to determine when and where duplicate plant should be permitted?