

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

1. On the issue of customer preference:
 - (a) What is your Company's position with respect to customer choice?
 - (b) Should new (i.e. unattached or non-metered) customers be able to request service from a distributor of their choice?
 - (c) If the answer to (b) is no, please reconcile your response with Objective 2 of the *Ontario Energy Board Act 1998* (the "OEB Act") and Section 28 of the *Electricity Act, 1998* (the "Electricity Act").

2. What are the advantages and disadvantages, if any, of allowing new (i.e. unattached or non-metered) customers to choose their distributor?

3. Does your Company agree that the obligation to connect is triggered by a written request from the customer as described in subsection 28(b) of the *Electricity Act*? Please explain your response?

4. Parties who made submissions to the jurisdictional question raised by Hydro One in this proceeding took the position that overlapping service areas were permitted by subsection 70(6) of the *OEB Act*.
 - (a) If your Company does not agree with this conclusion, please explain why.
 - (b) Would allowing licenses to overlap be a more efficient way for the Board to manage changes to service areas or should the current practice of amending the incumbent and applicant's licenses be continued?
 - (c) Please explain why your Company prefers the option it selected in (b).
 - (d) Please describe any alternatives that your Company thinks might be better than the options described in (b).

5. Should system expansion and customer growth for your Company be limited to its existing service area or should the Company be able to compete for attachments outside its authorized service area? Please explain your response.

6.
 - (a) Does your Company believe that it could connect to Hydro One's grid as an embedded distributor and serve customers in green-field developments just as or more efficiently than Hydro One?
 - (b) If the answer to (a) is no, please explain why and indicate whether you think your Company could compete effectively through contiguous expansion of its existing service area.
 - (c) If the answer to (a) is yes please explain why you think your utility could do this and how your new (i.e. unattached or non-metered) customers would benefit without harming Hydro One's existing (i.e., connected or metered) customers.
 - (d) Does your Company believe that there other distributors that could effectively compete with Hydro One? If so, please explain how these distributors could serve customers more efficiently than Hydro One either by expanding their systems or connecting to Hydro One's network as an embedded distributor?

7.
 - (a) Should the ability of a LDC to provide customer benefits be limited to contiguous expansion or should it also be allowed to expand its customer base as an embedded distributor (i.e. connecting its distribution facilities to and downstream of the host distributor's system)?
 - (b) If the answer to (a) is contiguous expansion only, please explain why there would be any difference between the customer benefits derived from contiguous expansion and those derived from embedded distribution.
 - (c) Please indicate how and to what degree customers might benefit from LDCs being allowed to expand their services outside their service areas?

8. If the Board decides to limit access to and competition for distribution services to new (i.e. unattached or non-metered) customers,
 - (a) what would happen to the benefits of open access and customer choice, and,

- (b) Would customers still benefit from competition, and if not, why not?

- 9. Hydro One has suggested that network assets will be stranded if other distributors are allowed to serve new (i.e. unattached or non-metered) customers in Hydro One's current area of service.
 - (a) What assets, if any, does your Company think would be stranded if new customers were served by your Company, another LDC or an embedded distributor using the same upstream network assets that Hydro One would use to serve the same customers? In responding to this question, please assume that the customers are served through an embedded distribution connection to Hydro One's system rather than a contiguous connection to your system.
 - (b) If the answer to (a) is there would be no stranding, please explain why.

- 10. Section 28 of the Electricity Act states that a distributor has an obligation to connect buildings that are located along the distributor's distribution system if the owner, occupant or other person in charge of the building has requested the connection in writing. This section appears to ensure that in every situation, an obligation to connect exists.
 - (a) Would your Company agree that the obligation to connect remains in effect and is driven by customer choice and proximity, even in the case of overlapping licenses?
 - (b) If the answer to (a) is no, please explain your response.

- 11. With regard to overlapping service areas:
 - (a) Would customers in an overlapping service area benefit more from having access to two or more readily available distributors than customers in a single service area? Please explain your response.
 - (b) Would customers be able to request service from any of the overlapped utilities? Please explain your response.
 - (c) How would the obligation to connect be ensured and administered where there are two or more LDCs authorized to serve customers in the same area?

12. Under section 4.0.1(1) of Regulation 161/99, certain building/land owners or operators are exempt from certain licensing and rate requirements under the OEB Act. Having regard to this section, please respond to the following:
- (a) Are any assets of a host distributor stranded when exempt landlords or building owners decide to or continue to operate as unlicensed distributors downstream of the host distributor's bulk meter?
 - (b) Would your response to (a) change if in addition the exempt land/building owner decides to install individual meters in each suite?
 - (c) Would your answer to (a) or (b) change if the building was sold and the new owner wanted to continue to own and operate the unlicensed distribution system?
 - (d) Would your response be different if the operation of the distribution system was subcontracted to a third party?
 - (e) Would the same be true if the ownership of the distribution facilities was transferred as well to the third party in (d)?
 - (f) If the answer to any of the questions in (a) through (e) is yes, please explain why?