

VECC INTERROGATORY #5

INTERROGATORY

Reference: Evidence of Wirebury Connections Inc., paragraphs 12, 20, 34 and 61

Preamble: “an applicant or connecting customer compensate an affected distributor for unpaid assets dedicated exclusively to the lands and structures which are the subject of the service area amendment”

“codify the requirement that the applicant compensate the affected distributor”

“existing customers or the LDC they are switching to must pay the costs”

“in a competitive market where connection customers have choices, but are required to pay the costs associated with their decisions”

- a) In situations where it is the applicant LDC that directly compensates the incumbent utility, is it Wirebury’s position that the cost of any such compensation should ultimately be recovered directly from the customers in the contested service area seeking connection to the applicant? If not, please explain why.

RESPONSE

- a) Wirebury believes that connected customers who chose to switch distributors should pay the associated connection and switching costs, including the costs of any stranded assets, just as connecting customers would be required to pay their own connection costs as described in Wirebury’s response to Veridian at Ex. J12, T2, S11.

