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Mr. Claude Doucet, Secretary General
Canadian Radio-television and Telecommunications Commission
Les Terrasses de la Chaudière
1 Promenade du Portage
Gatineau, Québec J8X 4B1

19, February 2021

RE: Telecom Notice of Consultation CRTC 2019-406: As modified by Telecom Notice of Consultation 2019-406-1 and 2019-406-2 – Further process.

Dear Mr. Doucet,

1. Founded in 1891, the Canadian Electricity Association (CEA) is the voice of more than 40 Canadian electrical utilities. CEA members include Generation, Transmission, and Distribution companies from all provinces and territories.
2. CEA members stress the criticality of the current legislative framework regulating utility pole access and rates remaining under the authority of provincial and territorial utility regulators. These bodies are unique in terms of possessing important insights into regional and local circumstances. Moreover, these bodies are the appropriate authorities to oversee the safe, secure, reliable, and equitable use of electrical structures. As such, we agree with the points raised by other stakeholders, namely that the CRTC does not have the authority, experience, or technical background to unilaterally regulate utility poles. This sentiment was echoed by the First Mile Connectivity Consortium (FMCC) and the Public Interest Advisory Council (PIAC).
3. Similar to submissions made by PIAC and FMCC, CEA believes that Canadians would be best served if the CRTC worked collaboratively with electric utility regulators on utility pole management to advance rural and remote broadband access. Collaboration with electricity industry regulators would ensure that the CRTC could explore opportunities to improve rural and remote broadband access that would not negatively impact the electrical grid or unfairly cross-subsidize telecommunications consumers at the expense of electrical customers.
4. As a first step in working with those provincial/territorial bodies, CEA recommends that the CRTC engage Canada's Energy and Utility Regulators (CAMPUT), whose membership spans every province and territory. CAMPUT's members have the experience and technical background to provide an electrical industry regulatory perspective on matters that affect the safe, reliable, and affordable transmission and distribution of electricity.
5. CEA members continue to work with our telecommunications partners with a view to assisting the expansion of broadband networks in Canada and thereby better serving both telecommunications and electricity customers in a fair and equitable manner.





Canadian
Electricity
Association

Association
canadienne
de l'électricité

Yours sincerely,

Arjun Devdas
Manager Asset Optimization, Hydro One
Chair, CEA Joint Use Practice & Policy Committee

Channa Perera
Vice President, Regulatory Affairs and Best Practices
Canadian Electricity Association

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